

# Privacy Policy

## Statement of Policy

It is the policy of STP ComplianceEHS (STP) to control the collection, use, and disclosure of personal information in accordance with all requirements set out in current Privacy legislation in both Canada, and the United States of America.

## 1.1 Requirements

The following requirements shall be met by STP unless exempted by the legislation.

### Collection of Personal Information

Unless otherwise authorized by the legislation:

1. No personal information shall be collected by STP unless it relates directly to an operating program or activity of STP.
2. STP shall, wherever possible, collect personal information that is intended to be used for an administrative purpose and software functionality purposes directly from the individual to whom it relates except where the individual authorizes otherwise.
3. STP shall inform any individual from whom it collects personal information of the purpose for which the information is being collected.

### Retention of Personal Information

Personal information that has been used by STP for an administrative purpose or software functionality purposes shall be retained for such a period of time after it is so used as may be prescribed by regulation in order to ensure that the individual to whom it relates has a reasonable opportunity to obtain access to the information.

### Accuracy of Personal Information

STP shall take all reasonable steps to ensure that personal information that is used for an administrative purpose and software functionality purposes is as accurate, up-to-date and complete as possible.

### Disposition of Personal Information

STP shall dispose of personal information under its control in accordance with the regulations and with any directives or guidelines issued by the designated minister in relation to the disposal of that information and with its corporate retention schedule.

### Use and Disclosure of Personal Information

Personal information under the control of STP shall not, without the consent of the individual to whom it relates, be used or disclosed by STP except for the purpose for which

the information was obtained or compiled or for a use consistent with that purpose unless otherwise authorized by the Legislation. In certain circumstances personal information subject to the Legislation may be used, or disclosed without the knowledge or consent of the individual concerned. Such circumstances include, but are not limited to personal information used or disclosed:

1. for the purpose for which the information was obtained or compiled by STP or for a use consistent with that purpose;
2. for the purpose of complying with a subpoena or warrant issued or order made by a

2. require that a notation be attached to the information reflecting any correction requested but not made; and
3. require that any person or body to whom that information has been disclosed for use for an administrative purpose within two years prior to the time a correction is requested or a notation is required under this subsection in respect of that information
4. be notified of the correction or notation, and
5. where the disclosure is to a government institution, the institution makes the correction
6. or notation on any copy of the information under its control.

#### Refusal of Access to Personal Information

STP may refuse access to personal information as provided by the Legislation where such information, among other circumstances:

1. is subject to solicitor/client privilege
2. is part of or relates to an investigative record where disclosure could be injurious to the
3. enforcement of a law of Canada or the United States of America or the conduct of
4. investigation.
5. Where disclosure threatens the safety of individuals.

#### 1.2 Responsibility

All STP employees, who collect, maintain and/or use personal information, are responsible for ensuring that the collection, use and disclosure of this information is carried out in accordance with this policy and relevant procedures.

#### Privacy on the Internet

This privacy statement is applicable to all STP websites.

STP respects the privacy of its Internet users and will protect that privacy as vigorously as possible.

STP does not collect information that personally identifies individuals except when individuals provide such specific information on a voluntary basis. There may be occasions where specific personal information is requested before an individual can enter certain sections of a STP's site. For example, registration is needed to enter corporate multi-usermulti

## Operating Principles

All questions related to the interpretation and application of this policy should be directed to the President, STP ComplianceEHS, Phone: 604-983-3434; E-mail [info@stpub.com](mailto:info@stpub.com).

Upon request, an individual shall be provided with a copy of this policy.