



Davenport Developments Ltd Personal Information Protection Policy

Davenport Developments Ltd is committed to safeguarding the personal information entrusted to us by our clients. We manage your personal information in accordance with Alberta's Personal Information Protection Act and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to Davenport Developments Ltd and to any person providing services on our behalf. A copy of this policy is provided to any client on request.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- deliver requested products and services
- provide product or service quotes
- apply with our partnership lender service

We normally collect client personal information directly from our clients. We may collect your information from other persons with your consent or as authorized by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a client volunteers information for an obvious purpose (for example, producing a credit card to pay a fee when the information will be used only to process the payment).

Consent

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).



In cases that do not involve sensitive personal information, we may rely on “opt-out” consent. For example, we may disclose your contact information to other organizations that we believe may be of interest to you, unless you request that we do not disclose your information. You can do this by checking the appropriate box on our application form or by telephoning our local number/toll-free number.

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety.

How do we use and disclose personal information?

We use and disclose client personal information only for the purpose, for which the information was collected, except as authorized by law. For example, we may use client contact information to deliver goods.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this (e.g. the law allows organizations to use personal information without consent for the purpose of collecting a debt).

How do we safeguard personal information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases, we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Davenport Developments Ltd, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual.



If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to Cheryl Whitten, Communications & Design. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by Davenport Developments Ltd, or about a request for access to your own personal information, please contact Cheryl Whitten, Communications & Design.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Toll Free: 1-888-878-4044

Email: generalinfo@oipc.ab.ca

Website: www.oipc.ab.ca