



# Privacy Policy

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## Our Ten Privacy Principles

The Alto Group of Companies has always been, and will continue to be, committed to maintaining the accuracy, confidentiality and security of your Personal Information. As part of this commitment, we have adopted the 10 Principles established by the Canadian Standards Association's Model Code for the Protection of Personal Information. These principles form part of the Personal Information Protection and Electronic Documents Act (the "Act"), which establishes rules governing the collection, use and disclosure of Personal Information by the private sector.

If you have any questions about the Alto Group Privacy Policy, please contact Juanita at (306) 955-0554 or by email at [jbeal@altoconstruct.com](mailto:jbeal@altoconstruct.com).

These 10 policies will govern the use of personal information:

- Principle 1 – Accountability
- Principle 2 – Identifying Purposes
- Principle 3 – Consent
- Principle 4 – Limiting Collection
- Principle 5 – Limiting Use, Disclosure and Retention
- Principle 6 – Accuracy
- Principle 7 – Safeguarding Information
- Principle 8 – Openness
- Principle 9 – Individual Access
- Principle 10 – Handling Complaints and Enquiries

### ***Principle 1 – Accountability***

The Alto Group of Companies is responsible for maintaining and protecting the personal information under its control. The Alto Group of Companies will designate an individual or individuals to be accountable for compliance with the 10 Privacy Principles.

### ***Principle 2 - Identifying Purposes***

The purpose for which personal information is collected will be identified before or at the time the information is collected.

### ***Principle 3 – Consent***

The knowledge and consent (express or implied) of the individual are required for the collection, use or disclosure of personal information except where required or permitted by law.

### ***Principle 4 – Limiting Collection***

The collection of personal information will be limited to that which is necessary for the purposes identified. Personal information will be collected by fair and lawful means.

### ***Principle 5 – Limiting Use, Disclosure and Retention***

Personal information will not be used, disclosed or retained for purposes other than those for which the information was collected, except with the consent of the individual or as required or permitted by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

### ***Principle 6 – Accuracy***

Personal information will be kept as accurate, complete and up-to-date as necessary to fulfil the purposes for which it is to be used for.

***Principle 7 – Safeguarding Information***

Safeguards appropriate to the sensitivity of the information will protect personal information.

***Principle 8 – Openness***

The Alto Group of Companies will be open about its policies and practices regarding management of personal information. Alto will ensure that individuals are reasonable able to acquire information about Alto's policies and practices and will make this information available in a form that is generally understandable.

***Principle 9 – Individual Access***

Upon request, in writing, an individual will be informed of the existence, use and disclosure of their personal information, and will be given access to it. An individual will be able to challenge the accuracy and completeness of the information, and may request that it be amended, if appropriate.

***Principle 10 - Handling Complaints or Inquiries***

An individual will be able to direct a challenge concerning compliance with the above principles to Juanita.

## **What Information is Collected?**

Within the Alto Group of Companies, we collect personal information to compile a secure portfolio of each prospective or existing employee that will be used as a hiring tool as well as an overall effective management guide for employees at job sites.

Most of the information we collect comes to us directly from you, through resumes and application forms, and therefore, with your consent.

The information that is essential for establishing employment typically includes your name, mailing address, phone numbers, bank address and account number for payroll deposit, Social Insurance Number, Hospitalization Number, Date of Birth, next of kin name and address and in some cases health information.

All the information you provide to us is securely maintained and is kept strictly confidential.

## Types of Information We Collect

Having up-to-date and accurate information helps us be proactive in case of emergency as well as providing several support services while employees are at a job site or simply for hiring an individual.

The type of information we collect and maintain in your file may include, but is not limited to, an individual's:

### ***Personal Resumes***

- Name
- Mailing Address
- E-Mail Address
- Home Telephone Number
- Cellular Telephone Number
- Social Insurance Number
- Date of Birth
- Career History

### ***Employment Portfolios***

- Name
- Mailing Address
- E-Mail Address
- Home Telephone Number
- Cellular Telephone Number
- Social Insurance Number
- Date of Birth
- Marital Status
- Next of Kin Name
- Next of Kin Address
- Next of Kin Telephone Number
- Bank Name
- Bank Address
- Bank Account Number
- Hospitalization Number
- Hire Date
- Wage/Income
- Evaluations
- Medical Records for certain working conditions
- Injury/Worker's Compensation History
- Career History

The choice to provide us with personal information is always yours. During employment, however, your decision to withhold particular details may limit support from management in emergency situations.

## How Your Information is Used

At the Alto Group of Companies, we use two primary types of information:

- We use the personal information from a resume to communicate with you, check references and, if successful, for hiring purposes.
- We use extended detail (beyond resume information) for effective administration of you and your employment information.

### ***Resume Information***

We use your personal information that you have provided on your resume as a means to communicate with you and your references. The better we know you and your work history the better we can determine the most effective way to utilize your skills and abilities.

### ***Employment Information***

The majority of the information that we retain after initiation of employment is used to administer items such as payroll, workers compensation and information required for the Government of Canada in relation to employment.

Certain information relating to next of kin and hospitalization number is used in case of emergency. Other medical information regarding medical condition may be used to verify that you are able to work under certain environmental conditions that may pertain to a specific job.

## **When Information May be Disclosed to Outside Parties**

At the Alto Group of Companies, we are obliged to keep your personal information confidential except under the following special circumstances:

- When Authorized by You
- When Required by Law
- When Permitted by Law

### ***When Authorized By You***

By signing our Application for employment you are authorizing us to use the information for the following, but not limited to, the following purposes:

- To use the information for payroll purposes.
- To use the personal information in case of emergency.
- To use your SIN for tax reporting.

### ***When Required By Law***

The type of information we are legally required to disclose most often relates to government tax reporting requirements.

In some instances such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

### ***When Permitted by Law***

There are some situations where we are legally permitted to disclose personal information such as a medical emergency or suspicion of illegal activities.



## **With Whom We May Share Your Information**

The Alto Group of Companies and their employees are governed by strict standards and policies to ensure your information is retained securely.

Our employee information is strictly confidential and is not released to other parties unless authorized by you or is required or permitted by law.

### ***Our Employees***

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it.

As a condition of employment, all employees of the Alto Group are required to abide by the privacy standards we have established. Employees are well informed about the importance of privacy and are required to sign a confidentiality agreement that prohibits the disclosure of any information to unauthorized individuals or parties.

### ***Outside Service Suppliers***

We may contract an outside organization to process our company payroll.

When we contract our supplier to provide this specialized service, they are given only the information necessary to perform this service. Additionally, they are prohibited from storing, analyzing or using that information for purposes other than to carry out the service they have been contracted to provide.

Our supplier is bound by strict obligations designed to protect the privacy and security of your information.

## **How We Safeguard Your Information**

At the Alto Group of Companies we take all necessary precautions to ensure your individual information is kept strictly confidential.

### ***Paper Based Files***

All employee files are stored in locked filing cabinets where access is restricted.

### ***Electronic Files***

All electronic employee files are kept in a highly secured environment with restricted access.

## **Accessing and Amending Your Information**

At the Alto Group of Companies, several areas of employment are a direct result of the information we have. Therefore, it is important that your personal information is accurate. As an individual, you have the right to access, verify and amend the information held in your personal files. You also have the right to know:

- How we collected your personal information.
- How we are using it.
- To whom it may have been disclosed.

Upon request in writing, Alto Construction Ltd. will inform an individual of the existence, use and disclosure of his or her personal information and will provide access to that information, except where the law permits Alto Construction Ltd. to deny access.

### ***Accessing Your Information***

You may access and verify any of your personal information whenever you wish. If you believe any information we have about you is incorrect or incomplete, you have the right to ask us to change it. Alto Construction Ltd. will assist any individual who asks for help in preparing a request to the organization and will respond to all requests within 30 days.

### ***Amending Your Information***

To help us keep your personal information up-to-date, we encourage you to advise us of any inaccuracies and provide us with an updated resume on a regular basis. If you show that personal information that we may already have on file is inaccurate or incomplete, we will make the necessary changes.

### ***To Make a Change***

To make a change to the personal information contained in your file, please contact us by phone at (306) 955-0554, by fax at (306) 955-5987 or by email at [info@altoconstruct.com](mailto:info@altoconstruct.com).

If you feel we have not dealt with your request to your satisfaction, you can reference the Questions, Concerns and Complaints Section to proceed further.

### **Questions, Concerns and Complaints**

If you have a question about the privacy policies stated in this document, please feel free to advise us immediately.

If you have a concern or complaint about privacy, confidentiality or the information handling practices of the Alto Group, our employees or service suppliers, please call us at (306) 955-0554.