



Privacy Policy

Our Privacy Commitment

AbovePlan Corporation ('AbovePlan') is committed to protecting the privacy of personal information in our control. When personal information is required to be gathered, it will be treated in accordance with the principles of the Federal Personal Information Protection and Electronic Documents Act (Canada) – commonly referred to as 'PIPEDA.' Since PIPEDA was developed to be significantly similar to other international privacy protection laws, our policies, practices and procedures will be in compliance with international standards.

Key Principles of Protection of Personal Information

These are the key principles of the Canadian Standards Association Model Code for the Protection of Personal Information, as found in the Canadian Federal PIPEDA legislation and in the Privacy Policies of AbovePlan.

Personal Information covered by this policy includes any information about an identifiable individual that an organization collects, uses or discloses in the course of commercial activities, excluding the name, title, business address or telephone number of an employee of an organization.

1. Accountability

AbovePlan is responsible for any personal information under the organization's control, and is committed to acting in good faith to comply with the principles of PIPEDA and the protection of personal information.

2. Identifying Purpose

AbovePlan will identify the purposes for which we are collecting any personal information at the time of collection in clear and understandable terms.

3. Consent

The consent of the individual is required for the collection, use or disclosure of any personal information (except for certain exemptions by law).

4. Limiting Collection

AbovePlan will collect only personal information which is required for the fulfillment of the purpose(s) identified.

5. Limiting Use, Disclosure and Retention

Personal information in the organization's control will not be used or disclosed for any purpose other than that for which it was collected, unless the consent of the individual has been obtained. Personal information will only be retained for as long as is necessary to fulfill the purpose(s) specified at the time of collection, or as required by law.

6. Accuracy

In order to be effective, personal information must be maintained as accurately as possible, and records will be updated with any changes provided by an individual.

7. Safeguards

Personal information will be protected by security measures appropriate to the sensitive nature of the data.

8. Openness

Information about AbovePlan's policies and practices for the protection and management of personal information are available upon request.

9. Individual Access

A person may request access to any of their own personal information under AbovePlan's control, including its use and disclosure, and may challenge the accuracy or correct any incompleteness in the data.

10. Challenging Compliance

If at any time a person wishes to raise a concern regarding AbovePlan's practices or procedures for the protection of personal information, they may do so by contacting the designated person (or persons) responsible for the organization's compliance.

Inquiries

If you have an inquiry about privacy or the personal information management practices at AbovePlan, please contact us using one of the methods shown below.

To help resolve any questions or concerns as quickly as possible, you can assist us by having any related facts, information or documentation prepared in advance. If sending information to us by mail, please ensure that you retain a copy for your records.

Significant details may include:

- Any documents sent or received related to your question/concern;
- The name of any employee whom you may have previously contacted regarding this issue;
- Details of any previous questions/comments/requests which may be related to the issue at hand.

By including sufficient details in your written communications to us, we will be able to identify the nature of the issue faster and determine the best possible means of responding to your inquiry as quickly as possible. Written inquiries may be submitted as follows:

By Mail:
Chief Privacy Officer
AbovePlan Corporation
59 Carrington Drive, Suite 200
Richmond Hill, ON L4C 8A5

By Email:
privacy@aboveplan.com

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