

# Privacy Policy

At Ignite Excellence Inc., respecting privacy is an important part of our commitment to respondents and the general public. Because the company respects the privacy of every individual who visits this Web site, the private nature of information provided to or collected on this site is appropriately maintained. In general, you can visit Ignite Excellence Inc. on the Web without telling the company who you are or revealing specific information about yourself. Ignite Excellence Inc. does gather limited data about Web site visitors. There are two kinds of information that the company collects: site visitorship data and personal information voluntarily provided to Ignite Excellence Inc. by site visitors.

Any time you participate as a respondent in our survey, you can be assured that your individual responses will be kept confidential and never linked to your personal identifying information without your express permission. Your personal identifying information will never be sold, passed on or given to anyone.

The Ignite Excellence Privacy Policy is a statement of principles and guidelines describing the level of protection of personal information provided by Ignite Excellence Inc. to respondents, clients and the general public. The objective of the Ignite Excellence Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada).

Ignite Excellence Inc. will continue to review its Privacy Policy to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

If you have any concerns about how your privacy is protected at Ignite Excellence Inc., please contact our Webmaster by e-mail at [info@igniteexcellence.com](mailto:info@igniteexcellence.com) or by mail at 33 Bloor Street East, Suite 900, Toronto, Ontario M4W 3H1 Canada.

NOTE: This site contains links to other Web sites. Ignite Excellence Inc. is not responsible for the privacy practices or the content of such sites.

## Scope and Application

The ten principles that form the basis of the Ignite Excellence Privacy Policy are interrelated and Ignite Excellence Inc. shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the Personal Information Protection and Electronic Documents Act (Canada), the commentary in the Ignite Excellence Privacy Policy has been drafted to reflect personal information issues specific to Ignite Excellence Inc.

The scope and application of the Ignite Excellence Privacy Policy are as follows:

- The Ignite Excellence Privacy Policy applies to personal information collected, used, or disclosed by Ignite Excellence Inc. in the course of commercial activities.

- The Ignite Excellence Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.
- The Ignite Excellence Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by Ignite Excellence Inc.:
- Non-personally identifiable information;
- The name, title, business address and/or telephone number of an employee of an organization;
- Other information about an individual that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act (Canada) .
- The application of the Ignite Excellence Privacy Policy is subject to the requirements and provisions of the Personal Information Protection and Electronic Documents Act (Canada) , the regulations enacted there under, and any other applicable legislation or regulation.

## Definitions

**Collection:** The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**Consent:** Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Ignite Excellence. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**Disclosure:** Making personal information available to a third party.

**Employee:** An employee of or independent contractor to Ignite Excellence Inc.

**Personal information:** Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization, and does not include descriptive, factual information about an organization.

**Respondent:** A member of the public who provides personal information to Ignite Excellence Inc. in the course of a survey conducted by Ignite Excellence Inc. For example, a respondent is an individual who discloses personal information to Ignite Excellence in the course of quantitative or qualitative marketing or social research.

Third party: An individual or organization outside of Ignite Excellence Inc.

Use: The treatment, handling, and management of personal information by and within Ignite Excellence Inc. or by a third party with the knowledge and approval of Ignite Excellence Inc.

## The Ten Principles of Privacy

### Principle 1 - Accountability

Ignite Excellence Inc. is responsible for personal information under its control and shall designate one or more persons who are accountable for Ignite Excellence Inc.'s compliance with the following principles.

Responsibility for compliance with the provisions of the Ignite Excellence Privacy Policy rests with the Ignite Excellence Webmaster who can be reached by email at [info@igniteexcellence.com](mailto:info@igniteexcellence.com) or by mail at 33 Bloor Street East, Suite 900, Toronto, Ontario M4W 3H1 Canada. Other individuals within Ignite Excellence Inc. may be delegated to act on behalf of the Webmaster or to take responsibility for the day-to-day collection and/or processing of personal information.

Ignite Excellence Inc. is responsible for personal information in its possession or control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

### Principle 2 - Identifying Purposes for Collection of Personal Information

Ignite Excellence Inc. shall identify the purposes for which personal information is collected at or before the time the information is collected.

Ignite Excellence Inc. collects personal information from the public only for the following purposes:

- to conduct quantitative or qualitative marketing and social research;
- to understand respondent opinions to establish suitability for further quantitative and qualitative marketing and social research; and
- to meet legal and regulatory requirements.

Further reference to "identified purposes" mean the purposes identified in this Principle.

Ignite Excellence Inc. shall specify orally, electronically or in writing the identified purposes to the respondent at or before the time personal information is collected in a survey. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Ignite Excellence Inc. who can explain the

purposes.

When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the respondent will be acquired before the information will be used or disclosed for the new purpose.

Ignite Excellence Inc. may provide clients or other third parties with information from any survey, in aggregate form. In aggregate form it is impossible to identify an individual respondent's personal information or their company's identity.

### Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

Participation by respondents in survey research is always voluntary. When a respondent agrees to participate in a survey, he/she gives consent by participating.

A respondent is always free to choose whether or not to participate in a survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

In obtaining consent, Ignite Excellence Inc. shall use reasonable efforts to ensure that a respondent is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the respondent.

Generally, Ignite Excellence Inc. shall seek consent to use and disclose personal information at the same time it collects the information. However, Ignite Excellence Inc. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, Ignite Excellence Inc. shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents.

The participation of a respondent in a quantitative or qualitative marketing or social research study may constitute implied consent for Ignite Excellence Inc. to collect, use and disclose the results of the survey for the identified purposes.

### Principle 4 - Limiting Collection of Personal Information

Ignite Excellence Inc. shall limit the collection of personal information to that which is necessary for the purposes identified by Ignite Excellence. Ignite Excellence shall collect personal information by fair and lawful means.

In conducting surveys, Ignite Excellence Inc. limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to individuals.

Ignite Excellence Inc. collects personal information about an individual primarily from that individual or a member of that individual's household. Except as permitted by law, Ignite Excellence Inc. will only collect personal information from external sources, such as client organizations, if individuals have consented to such collection.

#### Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Ignite Excellence Inc. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Ignite Excellence Inc. does not sell personal information to any third party. All information is kept in secure places.

Ignite Excellence Inc. may disclose a respondent's personal information:

- a client of Ignite Excellence Inc. where the respondent has consented to such disclosure; or
- a third party engaged by Ignite Excellence Inc. to perform functions on its behalf.

Only Ignite Excellence Inc.'s employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about respondents.

Ignite Excellence Inc. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law.

Ignite Excellence Inc. shall maintain reasonable and systematic controls, schedules, and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

#### Principle 6 - Accuracy of Personal Information

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

Personal information used by Ignite Excellence Inc. shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a respondent.

Ignite Excellence Inc. shall update personal information about respondents and employees as necessary to fulfill the identified purposes or upon notification by the individual.

#### Principle 7 - Security Safeguards

Ignite Excellence Inc. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

Ignite Excellence Inc. shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification, or destruction, through appropriate security measures, regardless of the format in which it is held.

Ignite Excellence Inc. shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of Ignite Excellence Inc.'s employees with access to personal information shall be required to respect the confidentiality of that information.

#### Principle 8 - Openness Concerning Policies and Procedures

Ignite Excellence Inc. shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

Ignite Excellence Inc. shall make information about its policies and procedures easy to understand, including:

- the title and address of the person or persons accountable for Ignite Excellence's compliance with its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- the means of gaining access to personal information held by Ignite Excellence Inc.;
- a description of the type of personal information held by Ignite Excellence Inc., including a general account of its use; and
- a description of what personal information is made available to related organizations (e.g. subsidiaries).

## Principle 9 - Individual Access to Personal Information

Upon request, Ignite Excellence Inc. shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon written request to the Webmaster, Ignite Excellence Inc. will inform an individual of the existence, use and disclosure of his/her personal information and shall be given access to that information.

In certain situations, Ignite Excellence Inc. may not be able to provide access to all the personal information that it holds about a respondent. For example, Ignite Excellence Inc. may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Ignite Excellence Inc. may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a respondent may be required to provide sufficient identification information to permit Ignite Excellence Inc. to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

Ignite Excellence Inc. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Ignite Excellence Inc. shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Respondents and employees can obtain information or seek access to their individual files by contacting the Ignite Excellence Webmaster.

## Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Ignite Excellence's compliance with the Ignite Excellence Privacy Policy.

Ignite Excellence Inc. shall maintain procedures for addressing and responding to all inquiries or complaints from its respondents regarding Ignite Excellence's handling of personal information.

Ignite Excellence Inc. shall, on written request, inform its respondents about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with the Ignite Excellence Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

Ignite Excellence Inc. shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, Ignite Excellence Inc. shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The respondent shall be informed of the outcome of the investigation regarding his or her complaint.

#### Personal information

Ignite Excellence Inc. will not collect any personally identifiable information about you (that is, your name, address, telephone number, or e-mail address) unless you provide it to us with your consent. If you choose to give Ignite Excellence Inc. personal information via the site, such as sending a message or a resume, we will only use it for the business purposes of Ignite Excellence Inc. and our group of companies. If you do not want your personally identifiable information collected, then please do not submit it to us. If you have already submitted this information and would like us to remove it from our records, please contact us to delete your information from our existing files. The same practices apply for information submitted by paper hard copy.

#### Visitorship data

We analyze the visitorship data for trends and statistics (e.g. so we know which are the most and least visited pages on the site), and then we discard it. This information is used to improve the content and organization of this site based upon traffic patterns in visitorship preference.

#### Additional Information

For more information regarding the Ignite Excellence Privacy Policy, please contact our Webmaster by e-mail at [info@igniteexcellence.com](mailto:info@igniteexcellence.com) or by mail at 33 Bloor Street East, Suite 900, Toronto, Ontario M4W 3H1 Canada.

Please visit the Privacy Commissioner of Canada's website at [www.privcom.gc.ca](http://www.privcom.gc.ca) for more details.