



PRIVACY POLICY

Overview

This statement discloses the privacy policy of NRCS Inc. concerning the collection of personal information.

NRCS is committed to safeguarding the confidentiality of any personal information it collects or stores. We collect personal information to serve our clients, and we are dedicated to ensuring that any personal information we receive is handled appropriately.

Scope

This policy applies to personal information about identifiable NRCS customers that is collected, used or disclosed by NRCS. It also applies to the management of personal information in any form whether oral, electronic or written.

Privacy Protection in Canada

This privacy policy has been developed to meet the compliance standards established by Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA).

The Act sets out the ground rules for the management of personal information in the private sector.

Organizations covered by the Act must obtain an individual's consent when they collect, use or disclose the individual's personal information. The individual has a right to access personal information held by an organization and to challenge its accuracy. Personal information can only be used for the purposes for which it was collected. Individuals should also be assured that their information will be protected by specific safeguards, including measures such as locked cabinets, computer passwords and encryption.

For more information regarding this legislation, please visit the Web site of the Privacy Commissioner of Canada at <http://www.privcom.gc.ca>

Definitions

Consent – Voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing.

Disclosure – Making personal information available to a third party.



Personal Information – Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes:

- Age, name, income, ethnic origin
- Opinions, evaluations, comments, social status, or disciplinary actions
- Employee files, credit records, loan records, medical records, intentions (i.e. to acquire goods or services, or change jobs)

Personal information does not include the name, title, business address or telephone number of an employee of an organization. Generally, it will also include health information – directly from the client, or from those who may have provided (or may provide in the future) health services to them.

Third Party – An individual or organization outside NRCS.

What Personal Information Do We Collect?

Personal information is any information that identifies an individual, or by which an identity could be deduced. If we did not collect and use personal information, we could not provide the client with rehabilitation services.

How Do We Collect Personal Information?

We collect information only by lawful and fair means. Wherever possible we collect personal information directly from the client. Sometimes we may obtain information from other sources: for example,

- the insurance company;
- the employer;
- the educational institution;
- from a government agency or registry.

Use of Personal Information

NRCS will only use personal information when information authorized by the client, when required by law, or when permitted by law. This may include:

1. For use by NRCS staff, but only for the purposes which NRCS has been retained to provide its services.



2. For use by other authorized recipients – which may include:
 - a. Insurers or Agencies that the client may be claiming from, and their legal representatives
 - b. Physicians and Health Professionals
 - c. Legal representatives advising the client.
3. For research purposes – uses anonymous aggregate data to assist NRCS to better serve its clients. We will not connect names or other identifying pieces of information to the research data taken from our files.
4. NRCS may be required by law enforcement agencies or judicial authorities to provide information of a personal nature
 - a. Necessary to defend NRCS interests in court proceedings – actual or threatened
 - b. In the public interest such as – detection or protection of crimes after being satisfied that the authority making the request has legitimate grounds to do so.
5. The client may be required to pay the reasonable costs of providing requested copies of documents in our files. There is no fee payable for any NRCS efforts to correct errors or misinformation that are brought to our attention.

Our Ten Privacy Principles

There are ten principles which form the basis of NRCS' policy. These principles are interrelated and NRCS shall adhere to them as a whole.

1. Accountability

NRCS acknowledges it is responsible for safeguarding personal information. It has designated an individual within the company who is accountable for compliance with these principles.

2. Identifying Purposes

We will identify the purposes for collecting personal information at or before the time we collect it.

3. Consent

We will obtain the individual's consent to collect and use personal information except where required or permitted by law.



4. Limited Collection

We will only collect the personal information that may be necessary to do our work. We will only retain personal information – as long as is necessary to fulfill the purposes for which it was collected, or in keeping with reasonable business practices, or as required by law.

5. Limiting Use, Disclosure and Retention

NRCS shall not use or disclose personal information for purposes other than those for which it was collected, except with an individual's consent or as required by law. Furthermore, NRCS shall retain personal information only as long as to fulfill the purposes for which it was collected or as required by law.

6. Accuracy

Personal information shall be accurate and as up-to-date as necessary to fulfill the purposes for which it was collected.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8. Openness

NRCS shall make available specific information about policies and practices relating to the management of personal information.

9. Individual Access

Upon request, an individual shall be given access to his or her personal information. Exceptions must be specific. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with privacy requirements to a designated individual or individuals.



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How We Safeguard Information

Client Files

Electronic client files are kept in a secured environment with restricted access. Paper-based files are stored in locked filing cabinets with restricted access.

Online Security

When transferring sensitive personal information, password protection is used.

Individual Access

Individuals may obtain access to any personal information collected by NRCS. They may be required to pay for services (i.e. photocopy) summaries at reasonable commercial rates.

If there is any disagreement about the accuracy of information NRCS has generated in NRCS files, the views of the individual will be recorded in the file.

Choice Regarding the Disclosure of Personal Information

The choice to provide NRCS information is always up to the client. However, the decision to withhold certain information or to add restrictions to its use, may hinder or prevent NRCS from doing the work it has been retained to do. In turn, this may affect relations with Insurers or Agencies that the client may be claiming from.

Questions, Concerns and Complaints

If there is a question, concern or complaint about privacy, confidentiality or the information handling practices of NRCS or an employee, please contact our Privacy Officer by:

Telephone: 1-800-750-7956

Mail: NRCS Inc.
31 Larch St. Suite 200
Sudbury, ON
P3E 1B7
Attention: Privacy Officer