CESARONI TECHNOLOGY INCORPORATED	Privacy Policy	
	Process Owner: Gordon Clarke	Version 1.04
Document #: CTI-ADM-POL-002	Status: Issued	Last Amended: 2018-08-29
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Cesaroni Technology Inc. ("CTI") does collect some information about individuals that is defined as "personal information" under the Personal Information Protection and Electronic Documents Act. ("the Act"). CTI respects and follows the requirements of the Personal Information Protection and Electronic Documents Act.

The designated individual responsible for the company's compliance with the Act is the Company Privacy Officer ("CPO"). The CPO may be contacted by writing to CTI at its corporate office, or by e-mail to <a href="mailto:privacy@cesaroni.net">privacy@cesaroni.net</a>.

In our collection and handling of personal information, we adhere to the 10 principles of the Act. These are:

1) Accountability

The CPO is directly accountable to the President and Board of Directors of the CTI for the handling of personal information by the company. Means of contacting this person will be listed on the company web site or by contacting corporation. This person is responsible for the drafting and following of policies and procedures for the handling of personal information, so that these policies may be kept current with both member expectations and applicable laws. They will also brief all employees on the requirements and responsibilities of the Act.

## 2) Identifying Purposes

The company collects various items of information in the course of normal business. This information can include: full names, emergency contact information, dates of birth, citizenship and other information required for security screenings, as required by the Defence Production Act for people have expressed a desire to visit or work for CTI. CTI will not sell, lend or make this information available to any person or organization other than government law enforcement agencies, without the consent of the individual(s) or as required by law.

## 3) Consent

CTI does not actively seek out or collect personal information from nonemployees apart from advertising for positions available, normal business affairs,

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and security screenings required under the Defence Production Act. Personal information provided to CTI is kept in confidence and will not be used for any other purpose without the expressed consent of the individual(s) involved.

4) Limiting collection

CTI does not collect personal information beyond that which is necessary for normal business, hiring and facility security screening purposes.

5) Limiting use, disclosure and retention

CTI will not disclose personal information to anyone outside of CTI, except for federal government agencies for the purposes of security screening, without the express consent of the individual(s) involved, unless required to by a provision in the Act for law enforcement purposes. Résumés of non-employees will be kept for a maximum of one year. All resumes supplied from people who are not hired will be disposed of within a period of one year from date of receipt and will be disposed of in a manner that is consistent with the requirements of the Act.

6) Accuracy

CTI strives to ensure its information is as accurate as possible. Anyone who believes there is incorrect information in the company records should make the CPO aware of this, and they will act accordingly.

7) Safeguards

CTI will protect personal information from loss or theft using all reasonable means available.

8) Openness

CTI policies for the collection, use and handling of personal information will be readily available through the company web site, or by request to the CPO.

9) Individual Access

Any individual may request to know if CTI has personal information about them. CTI, through the CPO, will reply as quickly as practical, but in no longer than 30

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days, as required by the Act. The individuals may see what, if any, information the company holds about them and may request that that information be corrected or amended. Any dispute will be handled as outlined in the Act.

10) Challenging compliance

All complaints about how CTI handles personal information will be recorded and dealt with in as expeditiously a manner as possible. Any matter not handled to the satisfaction of the complainant may be brought to the attention of the President for resolution. Should the President be unable to resolve the matter satisfactorily, the complainant may appeal to the Privacy Commissioner of Canada (<u>www.privcom.gc.ca</u>), as stated in the Act.