

ThinkHQ Public Affairs Inc.
Privacy Policy
(July 2016)

523 21 Ave. S.W.
Calgary, AB T2S 0G9

Contact: info@thinkhq.ca



ThinkHQ Public Affairs Inc. Corporate Privacy Policy

ThinkHQ Public Affairs Inc. (“THQ”) is deeply committed to respecting privacy as part of our relationship with clients, research participants and the public at large.

When you participate in telephone or panel research conducted by our company, you can be assured that any personal information that you share with us will stay with us.

Whenever you participate as a respondent to our research, you can be assured that your individual responses will be kept confidential and never linked to your personal identifying information without your express permission. You are free to choose whether or not to participate in our research, free to choose not to answer any specific questions and free to discontinue participation at any time.

The THQ Privacy Policy is a statement of principles and guidelines describing the level of protection of personal information provided by THQ to respondents and the general public. The objective of the THQ Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the Personal Information Protection and Electronic Documents Act (Canada), Canada’s Anti-Spam Legislation and the Personal Information Protection Act (Alberta).

THQ will continually review its Privacy Policy to ensure it is relevant and remains current with changing industry standards, technologies and laws.

If you have any concerns about how your privacy is protected by ThinkHQ Public Affairs Inc., please contact our Privacy Officer by email at: info@thinkhq.ca Subject: Privacy Officer or by mail at:

ThinkHQ Public Affairs Inc.
523 21 Ave. S.W.
Calgary, AB T2S 0G9
Attention: Privacy Officer

ThinkHQ Public Affairs Inc.

Corporate Privacy Policy

- SCOPE & APPLICATION -

The principles that form the basis of the THQ Privacy Policy are interrelated and THQ will conform to these 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), Personal Information Protection Act (Alberta) and Canada's Anti-Spam Legislation, the commentary in the THQ Public Privacy Policy has been drafted to reflect personal information issues specific to THQ.

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

- The THQ Privacy Policy applies to personal information collected, used or disclosed by THQ in the course of commercial activities;
- The THQ Privacy Policy applies to the management of personal information in any form whether oral, electronic or written;
- The THQ Privacy Policy does not impose limitations on the collection, use or disclosure of the following information by THQ:
 - 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 THQ Privacy Policy is subject to the requirements and provisions of the Personal Information Protection and Electronic Documents Act (Canada), the regulations enacted thereunder, and other applicable legislation or regulation including the Personal Information Protection Act (Alberta) and Canada's Anti-Spam Legislation.

-DEFINITIONS-

Collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means and may include tracking, collecting and viewing limited system information from browsers such as IP addresses and originating websites and using tracking pixels.

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 person(s) 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 THQ. Implied consent is consent that can reasonably be inferred from a person's action or actions.

Disclosure: Making personal information available to a third party.

Employee: An employee of or independent contractor of THQ.

Personal Information: Information about an identifiable person(s), but does not include the name, title, business address or telephone number of an employee of an organization, or other information that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act (Canada) and does not include descriptive, factual information about an organization.

Respondents: A member of the public who provides personal information to THQ in the course of participating in research conducted by THQ.

Third Party: An individual or organization outside of THQ.

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

PRINCIPLES OF PRIVACY -Accountability-

THQ is responsible for personal information under its power, possession and control and shall designate one or more persons who are accountable for THQ's compliance with the principles outlined here.

Responsibility for compliance with the provisions of the THQ Privacy Policy rests with the THQ Privacy Officer. The THQ Privacy Office can be contacted by email at: info@thinkhq.ca Subject: Privacy Officer, or by mail at:

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Calgary, AB T2S 0G9
Attention: Privacy Officer

Other individuals within THQ may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

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

-IDENTIFYING PURPOSES FOR COLLECTION OR PERSONAL INFORMATION-

THQ shall identify the purposes for which personal information is collected at or before the time the information is collected.

THQ collects personal information from the public only for the following identified 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;
- To respond to reasonable inquiries received by ThinkHQ via its support mailbox; and

- To meet legal and regulatory requirements.

Further reference to “identified purposes” means the purposes identified in this principle.

THQ 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 will explain these identified purposes or refer the individual to an authorized designated person within THQ 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 obtained before the information will be used or disclosed for the new purpose.

THQ may provide clients and other third parties with information from any survey, in aggregate form, being a form that is impossible to identify an individual respondent’s personal information.

-OBTAINING CONSENT FOR COLLECTION, USE OR DISCLOSURE OF PERSONAL INFORMATION-

The knowledge and consent of a person are required for the collection, use or disclosure of personal information, except where it is not possible.

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

Personal information collected in the course of research is not disclosed to third parties other than, on occasion, the client sponsoring the research project and independent third party contractors operating on behalf and with the approval and consent of THQ. Independent third party contractors operating on behalf and with the approval and consent of THQ shall conform to the THQ Privacy Policy.

In circumstances where THQ does disclose information to a third party other than a client sponsoring the research project, THQ will explain

the reason for the disclosure to the respondent and obtain express permission from the respondent before making any such disclosure. A respondent will be free to choose whether or not to participate in research, free to choose not to answer specific questions and free to discontinue participation at any time.

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

Generally, THQ shall seek consent to use and disclose personal information at the same time it collects the information. However, THQ 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, THQ shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents.

The participation of a respondent in a qualitative or quantitative marketing or social research study may constitute implied consent for THQ to collect, use and disclose personal information for the identified purposes.

-LIMITING COLLECTION OF PERSONAL INFORMATION-

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

In conducting research, THQ limits the amount and type of personal information it collects. THQ collects only the amount and type of information required for the purposes identified to individuals.

THQ collects personal information about a respondent primarily from that person or a member of that person's household. Except as permitted by law, THQ will only collect personal information from external sources, such as client organizations, if persons have consented to such collection.

-LIMITING USE, DISCLOSURE AND RETENTION OF PERSONAL INFORMATION-

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

THQ may disclose a respondent's personal information to:

- A client of THQ where the respondent has consented to such disclosure;
- A third party engaged by THQ to perform functions on its behalf;
- A public authority or agent of a public authority if, in the reasonable judgment of THQ, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; or
- A third party or parties, where the respondent consents to such disclosure or disclosure is required or permitted by law.

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

THQ will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where a respondent may have to be re-contacted for purposes of clarifying responses to a survey or to seek additional responses, THQ will retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

THQ 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 rendered anonymous.

-ACCURACY OF PERSONAL INFORMATION-

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

Personal information used by THQ will 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.

THQ will use reasonable efforts to update personal information about respondents and employees as necessary to fulfill the identified purposes or upon notification by the respondent.

-SECURITY SAFEGUARDS-

THQ shall protect personal information through the implementation and use of reasonable security safeguards appropriate to the sensitivity of the information.

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

THQ 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 THQ's employees with access to personal information shall be required to respect the confidentiality of that information.

-OPENNESS CONCERNING POLICIES AND PROCEDURES-

THQ will make readily available to persons specific information about its policies and procedures relating to the management of personal information.

THQ will use reasonable efforts to make information about its policies and procedures easy to understand, including:

- The title and address of the person or persons accountable for THQ'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 THQ;
- A description of the type of personal information held by THQ, including a general account of its use; and
- A description of what personal information is made available to related organizations (e.g. subsidiaries).

-INDIVIDUAL ACCESS TO PERSONAL INFORMATION-

Upon reasonable request, THQ will inform an individual of the existence, use, and disclosure of his or her personal information and will give the individual access to that information. A respondent will be able to challenge the accuracy and completeness of the information and have it amended as may be reasonably appropriate in the circumstances.

Upon reasonable written request to the Privacy Officer, THQ will inform an respondent of the existence, use and disclosure of his/her personal information and that respondent will be given reasonable access to that information.

In certain situations, THQ may not be able to provide access to all the personal information that it holds about a respondent. For example, THQ 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 person. Also, THQ 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 THQ to account for the existence, use and disclosure of personal information and to authorize access to the respondent's file. Any such information shall be used only for this purpose.

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

-CHALLENGING COMPLIANCE-

A person will be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for THQ's compliance with the THQ Privacy Policy.

THQ will maintain procedures for addressing and responding to all inquiries or complaints from its respondents regarding THQ's handling of personal information.

THQ will, on receiving reasonable 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 THQ Privacy Policy may seek external advice where appropriate before providing a final response to respondent complaints.

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

For more information regarding the THQ Privacy Policy, please contact the THQ Privacy Officer by e-mail at info@thinkhq.ca Subject: Privacy Officer, or by mail at:

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Attn: Privacy Officer

Please visit the Privacy Commissioner of Canada's website at www.privcom.gc.ca.