

Privacy Statement – Phoenix Systems

Phoenix Systems is committed to securing and protecting your private information obtained by reason of customer relationship between you, your business and *Phoenix Systems*. Our policies and practices have been designed to comply with the *Privacy Act* and the *Personal Information Protection and Electronic Documents Act* (PIPEDA), and we recognize the responsibility we have with our customers.

For over 35 years, *Phoenix Systems* has been responsible for all personal information under its control. To ensure clarity regarding our privacy statements, we have developed and implemented this Privacy Charter.

1. What personal information do we collect?

In most circumstances, personal information is collected directly from the individual for whom it belongs. *Phoenix Systems* obtains your consent to collect, use or disclose personal information; the method of obtaining consent depends on the circumstances of the situation. Consent may be oral, written or electronic. For customer relationships that already exist, the consent is implied, has previously been given, or the purpose of using personal information has already been made clear to you.

We only collect information that is needed, and the amount of information collected will be limited to meet those needs. We may, for example, collect your name, your business's name, email address, and contact information depending on what we need to use it for.

2. Why we collect personal information?

Phoenix Systems collects, uses, and discloses your information in order to:

- provide individualized services that meet your expectations and needs;
- verify your identity and protect against errors or fraud;
- better understand your and your business's specific needs to offer relevant information and services;
- track and analyze purchases, and purchase behaviours;
- determine your interest and eligibility to our services;
- provide you with valuable information;
- perform tests to implement systems; and
- comply with legal and regulatory requirements.

By providing information to *Phoenix Systems*, you consent using your personal information for the purposes listed above.

3. Who sees your personal information?

We will not disclose your personal information without consent unless it is allowed under the [section 8\(2\) of the Privacy Act](#). We assure you that we do not sell personal information, and we will only provide your data within *Phoenix Systems*, and our specific partners; whenever your information is shared with a partner, we require them to protect that information in a manner that is consistent with our Privacy Charter.

Access to personal information within *Phoenix Systems* will be restricted to those staff members who need that information to carry out their job duties. Those employees will comply with our Privacy Charter and will not provide access to the personal information to anyone who isn't authorized.

4. How we protect your personal information

The security of your personal information is of extreme importance to us. We will take all reasonable and organizational safeguards to protect your personal information from loss, theft and unauthorized access. However, no security controls are 100% effective and so *Phoenix Systems* cannot guarantee the security of your personal information. In the event that your personal information is, or believed to have been, subjected to unauthorized access, *Phoenix Systems* will notify you promptly and take all necessary steps to restore the integrity of your data. It is important that all users protect their devices and passwords from unauthorized access.

5. Retention of Information

We will retain personal information in accordance to the *Library and Archives of Canada Act*. We do not retain any of your information directly on our website.

“According to the *Privacy Act*, the *Privacy Regulations* and the *Library and Archives of Canada Act*, personal information we use to make a decision about an individual shall be retained for at least two years after that decision was made.”

6. Questions or Concerns

If you have any questions about your personal information management, please contact info@pho-sys.com. We are here to ensure that every employee is prepared to provide you with answers that will reflect our Privacy Charter.

We are responsible for the personal information that we collect, use, and disclose. *Phoenix Systems* acknowledges the responsibility it has with its customers and will continue to develop policies and practices to ensure that personal information is handled in accordance to the *Privacy Act* and *PIPEDA*.