



## PRIVACY AND CONFIDENTIALITY POLICY

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GRA Consultants Inc. (GRA) recognizes the importance of privacy, confidentiality and the protection of personal information (PI), personal health information (PHI) and security sensitive information that could compromise the privacy of PI and PHI if disclosed.

Personal information is defined as information about an individual or information that permits an individual to be identified. It does not include business contact information, such as name, title, address and telephone number when used for business communications.

Personal health information, is defined as identifying information about an individual in oral or recorded form, if the information,

- (a) relates to the physical or mental health of the individual, including information that consists of the health history of the individual's family,
- (b) relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual,
- (c) is a plan of service within the meaning of the *Home Care and Community Services Act, 1994* for the individual,
- (d) relates to payments or eligibility for health care, or eligibility for coverage for health care, in respect of the individual,
- (e) relates to the donation by the individual of any body part or bodily substance of the individual or is derived from the testing or examination of any such body part or bodily substance,
- (f) is the individual's health number, or
- (g) identifies an individual's substitute decision-maker.

This Policy conforms to Canada's privacy laws and to internationally recognized standards.

### **Collection, Use and Disclosure of Personal Health Information**

GRA does not collect or store personal health information.

GRA will align our information practices with our customer's privacy obligation by entering into a mutually agreeable confidentiality agreement or consulting agreement that identifies our privacy and security obligations. Should GRA inadvertently come into contact with PI or PHI, we will immediately notify responsible parties of the disclosure and the associated circumstances.

### **Collection, Use and Disclosure of Personal Information**

GRA collects personal information from employees as is required for employment purposes, including home address to administer payroll and benefits programs. Limited personal information is disclosed to any contracted benefits and/or payroll administrator. GRA limits collection of personal information to that which is required for the purposes noted above, directly from the individual with their knowledge and consent.

GRA only gathers personal information that is specifically and voluntarily provided by our customers, as well as by visitors to the GRA website. GRA receives limited information, such as name, telephone number and email address from website visitors.

Personal information may be collected about our customers and their clients through the provision of consulting services as well as through relationship building and business communication. Where appropriate, GRA will seek specific consent to collect, use and disclose personal information.

Personal data collected by us is confidential and we do not disclose the information to any third party except with actual or implied consent, or as permitted or required by law.

GRA does not disclose personal information to any third party to enable them to market their products or services. For example, we do not provide our customer mailing lists to suppliers or other customers. Under certain circumstances, GRA will disclose personal information, for example, if we engage a third party to provide services to us; if we consider it necessary to establish or collect payment; or if the information is already publicly known.

**GRA is committed to ensuring the confidentiality, integrity and availability of the information assets entrusted to it.**

### **Security**

GRA treats all personal information as private and confidential and we strive to ensure that any personal data, regardless of format, is protected and kept secure at all times.

During the execution of our services GRA may temporarily store customer's confidential information concerning their information systems and associated processes and practices on our computer systems. GRA and associated personnel uses physical, administrative, and technical measures to safeguard such information against disclosure. This includes (but not limited to) the use of strong cryptography to protect information transmitted via email or stored on computers and media. All such information is securely erased from all systems and media once our contractual obligations are fulfilled.

### **Protection of Security Sensitive Information**

Security sensitive information includes any documentation whose unauthorized disclosure could compromise the confidentiality of PI and PHI. This includes Threat and Risk Assessments, Privacy Impact Assessments, Privacy and Security Architectures, policies, procedures, system configuration, and any other security-oriented documentation created by the client, by GRA or product vendors.

GRA will apply appropriate means to protect the confidentiality of security sensitive information including the encryption of security sensitive documentation stored on GRA controlled devices or communicated on public networks.

### **Our Website**

The only personal information we collect through our website is the data voluntarily supplied by you if you contact GRA through the website. Typically, this information is restricted to your name and email address. We do not utilize any electronic means to automatically collect personal information from any visitor or user of our site or from their computers.

Our website may contain links to websites operated by third parties who may collect your personal information. GRA assumes no responsibility for the privacy practices, policies or actions of the third parties controlling these websites. We recommend that you read the privacy policies of these websites

### **Further Information**

For questions or more information, GRA's Privacy Officer may be contacted by email to: [tchankim@graconsult.com](mailto:tchankim@graconsult.com).

GRA reserves the right to modify or amend this Privacy Policy from time to time and we encourage you to refer back to this Policy regularly.