



## **JRoss Retail Recruiters Inc. Privacy Policy**

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This policy is based on the Guidelines for Developing a Privacy Policy Under the Personal Information Protection Act (PIPA) published by the Office of the Information & Privacy Commissioner for British Columbia May 20, 2004

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## **Privacy Policy Part 1: Introduction**

As a recruiting agency, JRoss is committed to protecting the privacy and confidentiality of its candidates, employees and contractors personal information as outlined in this Privacy Policy. It has been developed in compliance with British Columbia's Personal Information Protection Act ("PIPA"), and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA), which set out rules for how organizations such as ours can collect, use and disclose your personal information.

As providing our services requires the collection, use and disclosure of some personal information about our candidates, protecting their personal information is one of our highest priorities.

## **Privacy Policy Part 2: What is Personal Information?**

Personal Information means recorded information about an identifiable individual. Examples of personal information include: name, address, telephone number, race, etc. Personal information also includes an individual's personal history regarding health, finances, education, and current and historical employment.

Candidate personal information is information that is collected, used or disclosed solely for the purposes reasonably required to establish an employment relationship between a candidate and a client organization. This information is usually provided by the candidate in the form of a resume and may include information such as name, home address, education history and employment history. This does not include contact information.

Employee personal information is information that is collected, used or disclosed solely for the purposes reasonably required to establish, maintain, manage or terminate an employment relationship between an employee and an organization. This may include information such as name, home address, education history and employment history. This does not include contact information (see below).

Contractor personal information is information that is collected, used or disclosed solely for the purposes reasonably required to establish, maintain, manage or terminate a contractor relationship between a contractor and an organization. This may include information such as name, home address, education history and employment history. This does not include contact information or work product information (see below).

Client personal information is information that is collected, used or disclosed solely for the purposes reasonably required to establish, maintain, manage or terminate a client relationship between a client and an organization. This may include information such as name and employment history. This does not include contact information.

Contact information means information that allows an individual to be contacted at work. It includes the name, position name or title, business telephone number, business address, business e-mail and business fax number for the individual.



Work product information is information that is prepared or collected by an employee as part of that individual's work responsibilities, but does not include information about an individual who did not prepare or collect the information.

The Act also extends to include anyone else's opinion about the individual. This definition of personal information is not exhaustive.

## **Privacy Policy Part 3: Organizations to which the policy applies**

This policy extends to JRoss Retail Recruiters Inc., its corporate affiliates and subsidiaries, and its contractors.

## **Privacy Policy Part 4: Why JRoss collects and uses personal information**

### **Candidates**

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As a recruiting firm, JRoss collects personal information about candidates for the purpose of determining their degree of "fit" with client requirements. Personal information and resumes are kept in a database and in other paper and electronic forms to be used solely for the purposes of recruitment. Examples include name, home/work address, telephone number(s) and email address(es), employment information (current, historical and future goals), references, etc. or other information that is necessary to fulfill the following purposes, among others :

- To verify past employment by collecting reference and past work history information.
- To verify education by collecting educational information and contacting the institutions
- To identify candidate preferences by collecting information regarding candidate interests and aspirations
- To understand the financial needs of our candidates by collecting past salary information as well as salary expectations.

This does not include contact information.

### **Employees & Contractors**

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JRoss collects personal information for the purpose of establishing, maintaining, managing and terminating employee and contractor relationships. Personal information is kept in a database and in other paper and electronic forms to be used solely for the purposes of employment and contracting. Examples include name, home/work address, telephone number(s) and email address(es), employment information (current, historical and future goals), Social Insurance Number, GST and tax information, references, etc. or other information that is necessary to fulfill the following purposes, among others :

- To verify suitability for tasks, by collecting performance, work history and education information
- To comply with statutory requirements by collecting Social Insurance Numbers, GST numbers, and tax statuses



This does not include contact information.

### **Clients**

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JRoss collects personal information for the purpose of establishing, maintaining, managing or terminating client relationships. Personal information is kept in a database and in other paper and electronic forms to be used solely for the purposes of business development and recruitment. This may include information such as name, current and historical employment history, preferences, or other information that is necessary to fulfill the following purposes, among others :

- To establish and build client relationships
- To promote appropriate JRoss services
- To manage the delivery of services

This does not include contact information.

### **Anonymous Web Browsing**

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Visitors to the JRoss web site do not have to reveal who they are, or any other information about themselves. In this case, we may collect the IP address used to access the web site, the type and version of web browser and operating system used, the number, duration and frequency of visits to the web site, the starting and next web sites, etc. This anonymous information cannot be traced to a specific individual and is used for the following purposes, among others :

- To monitor web site performance for systems administration
- To make the web site more effective, easier and more convenient to use
- To improve JRoss' services
- To track information.

## **Privacy Policy Part 5: Limits on collection, use, and disclosure**

In its normal course of business, JRoss will only collect, use and disclose personal information as required to fulfill the purposes identified in this Privacy Policy. Where other purposes arise, JRoss will not disclose personal information without the consent of the individual. At all times, collection, use and disclosure of personal information will be in accordance with PIPA and PIPEDA.

Specific examples include, among others :

- Candidate names, contact information and/or resumes will not be provided to clients without the prior consent of the candidate, although work history and qualifications may be described to the client in general terms, so as to determine the level of "fit" to client requirements at a high level
- Candidate lists or other personal information will not be sold or rented to third parties, although where we are dealing with other reputable professional recruiting firms or contractors candidate personal information may be shared with them for the purposes identified in this Privacy Policy



- Client personal information will not be sold or rented to third parties, although where we are dealing with other reputable professional recruiting firms or contractors candidate personal information may be shared with them for the purposes identified in this Privacy Policy
- Information regarding visits to the JRoss web site of a particular IP address will not be disclosed except as required by law

## **Privacy Policy Part 6: How JRoss discloses personal information**

### **Candidates**

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Personal information, including resumes, employment history, interests and aspirations and financial requirements will be disclosed to client organizations to determine the level of “fit” with their requirements. It may also be disclosed to other reputable professional recruiting firms and contractors we are working with. In such cases, JRoss will ensure there is an agreement in place with these other reputable professional recruiting firms and contractors to adhere to JRoss’ privacy policy.

### **Employees and Contractors**

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Personal information will be disclosed to government bodies based on statutory requirements.

### **Clients**

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Personal information will be disclosed to candidates as appropriate to deliver JRoss’ services. It may also be disclosed to other reputable professional recruiting firms and contractors we are working with. In such cases, JRoss will ensure there is an agreement in place with these other reputable professional recruiting firms and contractors to adhere to JRoss’ privacy policy.

### **Required by Law**

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JRoss will disclose personal information where authorized by PIPA or required by law (ex. - a legal requirement to disclose include a court order, subpoena or search warrant, etc.), but will make all reasonable efforts to ensure the individuals affected are notified of such disclosure.

## **Privacy Policy Part 7: How JRoss obtains consent to collect, use, and disclose personal information**

JRoss will get individuals’ consent to collect, use or disclose their personal information, except where legally authorized or required by law to do so without consent.

JRoss may collect, use or disclose personal information without an individual’s knowledge or consent – as allowed under PIPA sections 12, 15 and 18 - in the cases of verification of employment history, references, and credit and other background checks.

Consent may be given orally, in writing or electronically, and consent may be implied or express depending on the nature and sensitivity of the personal information. This specifically includes submission of a



resume and/or covering letter or other inquiry to JRoss regarding employment opportunities, which constitutes implied consent. Individuals are also considered to have given implied consent when JRoss' purpose for collecting, using or disclosing personal information would be considered obvious and the individual voluntarily provides personal information for that obvious purpose.

JRoss will tell individuals the purpose for collecting personal information and give them a chance to refuse to provide their personal information or a chance to withdraw their consent later.

Individuals may withdraw consent for their personal information to be used in certain ways at any time by giving JRoss reasonable notice, but not where doing so would frustrate performance of a legal obligation (such as a contract between the individual and JRoss). When individuals tell JRoss they are withdrawing consent, PIPA requires us to inform them of the likely consequences of withdrawing consent, which will typically include reducing or eliminating our ability to provide them with new employment opportunities.

In the case of employee personal information, PIPA allows JRoss to collect, use or disclose employee personal information without consent if it is reasonable for the purposes of establishing, managing or terminating an employment relationship between JRoss and the individual. In this event, JRoss will still notify employees of the collection, use or disclosure.

## **Privacy Policy Part 8: How long JRoss retains personal information**

JRoss will keep personal information used to make a decision that directly affects individuals for at least one year after that decision is made, as required by PIPA.

Subject to the above one-year retention requirement, JRoss will only retain personal information for as long as necessary to fulfill the identified purposes or as long as required for a legal or business purpose.

## **Privacy Policy Part 9: How JRoss keeps personal information secure**

### **General**

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JRoss has appropriate security arrangements in place to prevent against risks such as unauthorized access, collection, use, disclosure, copying, modification or disposal of personal information. These include, but are not limited to

- Physically secured premises
- Individual ID's and password protected electronic storage
- Use of Adobe Acrobat and other document protection systems to guard against alteration of personal information
- Non-disclosure Agreements signed by all JRoss employees and contractors



- Personal information circulation restricted to recruiters and support staff who follow JRoss' Privacy Policy and privacy practices

In addition, JRoss is committed to continually reviewing and updating our security policies and controls as technology changes to ensure ongoing personal information security

### **Client and Other Organization Security**

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Once personal information is disclosed to a potential employer, government body or other organization under this Privacy Policy, it is no longer in our direct control. JRoss cannot guarantee that such organizations have the same policy of confidentiality and privacy, although we will make reasonable efforts to request that they treat the information appropriately.

### **Web site and the Internet**

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The JRoss web site contains links to other sites, and JRoss is not responsible for the privacy practices or the content of these web sites.

The JRoss web site does not currently use cookies, but should they be implemented at a future date notification will be included in this Privacy Policy. In any case, control of the cookies accepted is the responsibility of the individual using the JRoss web site.

Emails sent over the Internet are routinely used for communication between candidates, clients and JRoss representatives, as they are by most organizations and individuals around the world. However, the Internet is an inherently insecure communications medium, and the use of it can lead to inadvertent discovery or disclosure of such communications. JRoss cannot take any responsibility for any such discovery or disclosure or the consequences.

## **Privacy Policy Part 10: How JRoss ensures that personal information is accurate**

Any individual submitting personal information to JRoss has the sole responsibility for ensuring that information is accurate when submitted.

JRoss will make reasonable efforts to ensure that the personal information we collect, use or disclose is accurate and complete, and individuals may email us at [info@jrossrecruiters](mailto:info@jrossrecruiters) to request we correct any errors or omissions in their personal information that is under JRoss' control. That request must be timely and have enough detail to enable us to identify the personal information and the correction being requested. If we are satisfied that an individual's request for correction is reasonable, we will correct the personal information as soon as reasonably possible.

JRoss will, as soon as reasonably possible, also send an individual's corrected personal information to each organization it was disclosed to, where the correction would materially affect that individual.

If JRoss does not correct an individual's personal information, we will note the requested correction on copies of the personal information under our custody or control.

## **Privacy Policy Part 11: How JRoss provides individuals with access to their personal information under JRoss control or custody**

Individuals have the right to access their personal information under JRoss' custody or control. The request for access must be made in writing, and JRoss may require individuals to prove their identity before giving them access to their personal information.

JRoss will give individuals their personal information under our control, information about the ways in which their information is or has been used, and the names of the individuals and organizations to which their personal information has been disclosed.

As per PIPA guidelines, a "minimal" fee will be charged for providing an individual with access to his or her personal information, and a written fee estimate will be provided in advance of such access. At JRoss' discretion, payment of a deposit or the whole fee may be required before releasing the requested information.

Once the request and appropriate payment has been received, JRoss will provide requested personal information within 30 business days after it is requested, or we will give written notice if we need more time to respond. However, in some cases, JRoss may not give an individual access to certain personal information where authorized or required by PIPA to refuse access.

If JRoss refuses an access request, we will tell the applicant in writing, stating the reasons for our refusal and outlining further steps that are available to the applicant (including an internal review by JRoss and the right to ask the Office of the Information and Privacy Commissioner for British Columbia to review the decision).

## **Privacy Policy Part 12: How individuals can complain, ask for access or ask questions**

All privacy complaints, access requests or questions should be directed to Rob Fisher at 604.734.5584 ext 2, or [rob.fisher@jrossrecruiters.com](mailto:rob.fisher@jrossrecruiters.com)

If individuals are not satisfied with JRoss' response, they can complain to the Office of the Information and Privacy Commissioner for British Columbia.