

ODGERS BERNDTSON

PRIVACY POLICY

1. Our Commitment to Privacy

At Odgers Berndtson we respect the privacy and the confidentiality of the personal information provided by or on behalf of potential candidates, our clients recruiting such candidates, and outside parties who assist us in our search by providing references and other pertinent information. We are committed to keeping the personal information you share with us, whether over the Internet, on the telephone or through our branches and offices, confidential. The use of such information will only be for the purpose for which it was collected. This Privacy Policy explains how Odgers Berndtson collects, uses, discloses and protects the personal information we obtain.

2. What is Personal Information?

Personal information is any information about you as an identifiable individual and includes information with respect to your name, address, age, gender, income, marital status, financial situation, health, current employment and compensation package, and previous employment history and compensation package, together with your personal references and identification numbers (such as a social insurance number).

3. Important Principles For Your Protection

Our Privacy Policy consists of the following key principles:

Collecting and Using Personal Information - Either before or when we collect personal information about you, we will explain how we intend to use it. We will limit the personal information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your personal information for any other purpose.

Disclosing Personal Information - We may provide your personal information to clients only where we have your consent, or to others where we are required to do so by law.

Protecting Personal Information - We will protect the personal information we obtain about you with appropriate safeguards and security measures. We will retain your personal information only for the time it is required for the purposes we explain or as otherwise required by law.

Access to and Accuracy of Your Personal Information - We will give you access to the personal information we retain about you. We will provide you the opportunity to update the personal information we retain to ensure it is accurate.

Accountability and Openness to Your Privacy Concerns - We will explain your options of refusing or withdrawing consent to the collection, use and release of your personal information, and we will record and respect your choices. We will investigate and respond to your concerns about any aspect of our handling of your personal information.

The following sections will answer most of the important questions that you may have about how we fulfil each of these important principles, and how we will hold ourselves accessible and accountable to you.

4. Why We Ask for Your Personal Information

If you are a candidate, we ask you for information to consider your qualifications and interest to be referred to either a specific client, for a specific position, or to other clients who may retain us to recruit an individual with interests and qualifications similar to yours. When you provide this information you will be asked to acknowledge your consent for us to provide it to those clients. This consent is optional and you can decide to withdraw it at any time. Please refer to Understanding Your Options, section 7 in this Policy.

If you are a client who has retained Odgers Berndtson to recruit candidates for your organization, we ask you for information so that we can do a proper search and discuss your needs, expectations, organizational culture and other relevant issues with potential candidates.

If you are a reference for one of our candidates, we ask you to answer specific questions to validate the information we have about our candidate and to explore his or her skills and experience relative to the role in question, to assist our clients in their selection process.

5. How We Collect Personal Information About You

If you are a candidate, much of the information we collect comes directly from you. We may also obtain personal information about you from third parties to help us assess your eligibility and suitability as a candidate for positions for which are recruiting on behalf of our clients.

While we always try to protect the privacy of our candidates and clients, we understand you may choose to refuse or withdraw consent to the collection, use and release of your personal information and we will record and respect your choices. Please be aware that this may result in our inability to present you to our client as a candidate for the position in question.

6. When We Release Your Personal Information

We release your personal information to parties outside Odgers Berndtson only under the following circumstances.

With Your Consent - We will disclose your personal information to our clients with your prior consent.

When Required or Permitted by Law - In certain circumstances, the law may require or permit Odgers Berndtson to disclose your personal information without your knowledge or specific consent. For example, such information may be disclosed if required to comply with a subpoena, warrant, or court order, or if requested by a government institution, which has the lawful authority to obtain the information.

In exceptional circumstances it may be necessary that we disclose your personally identifiable information if we believe, in good faith, that disclosure is otherwise necessary or advisable to protect Odgers Berndtson's interests. We will seek to ensure that any proposed disclosure is required in the circumstances and then ensure that we disclose only the information that is required.

Under no circumstances do we sell personal information to other organizations.

7. Understanding Your Options

We will explain your options of refusing or withdrawing consent to the collection, use or release of your personal information, and we will record and respect your choices. In many cases you are free to refuse or withdraw your consent at any time. You may do so in writing by contacting our Privacy Officer, Alison Brown at Odgers Berndtson. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent, and record your options. With few exceptions, you can change your options at any time.

8. How We Protect Your Information

Odgers Berndtson stores and processes your personal information in Odgers Berndtson Canada's national server, located in Mississauga, Ontario using technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access as well as internal passwords and security policies.

Odgers Berndtson has offices across North America, Europe, Latin America, Asia, Africa and the Middle East. In order to ensure that the highest level of service provided to you as a potential candidate, we may provide your personal information to offices throughout Canada, as well as our international network. We use our best efforts to ensure that other Odgers Berndtson offices and our clients, as part of their agreements with Odgers Berndtson, are bound to maintain your confidentiality and may not use the information they obtain for any unauthorized purpose. When we provide information in response to a legal inquiry or order, we will first ensure that the order is valid and we disclose only the information that is legally required.

We will audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

We will retain your personal information only as long as it is required for the reasons it was collected or as required by law. This period may extend beyond the end of your relationship with us but only for so long as it is legally necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your personal information is no longer needed or required, we have procedures to destroy, delete, erase or convert it to an anonymous form.

9. Your Right to Access Your Information

We will give you access to the information we have about you. You may arrange such access by contacting the Odgers Berndtson Privacy Officer. We will advise you in advance if a minimal charge will be required for conducting the search, and we will respond to your request promptly, but in any case within 30 days, unless we advise you to the contrary.

Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to Odgers Berndtson or cannot be disclosed for other legal reasons. If you have any questions regarding decisions made, we will tell you the reasons for those decisions.

10. Keeping Your Information Accurate

We will give you the opportunity to keep your personal information accurate and up-to-date. Having accurate information about you enables us to give you the best possible service to our clients. You can help by keeping us informed of any changes. If you find any errors in our information about you, let us know and we will make, where necessary, the corrections as soon as reasonably possible and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

Contact:

For information on any aspect of our Privacy Policy, contact the Odgers Berndtson Privacy Officer:

vancouverprivacyofficer@odgersberndtson.ca

calgaryprivacyofficer@odgersberndtson.ca

torontoprivacyofficer@odgersberndtson.ca

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