



## **COVER-ALL COMPUTER SERVICES CORP. PRIVACY POLICY**

Cover-All Computer Services Corp. is committed to protecting the privacy of individuals and maintaining the confidentiality of personal information.

The following outlines Cover-All's Privacy Policy.

Any personally identifiable information about an individual (other than such items as name, title, business address and telephone number) is considered personal information and will be treated in accordance with this Privacy Policy, all applicable legislation, and Cover-All's own strict guidelines and procedures for protecting this information.

### **ACCOUNTABILITY**

*Cover-All Computer Services Corp. is responsible for personal information under our control including all information transferred to third parties for processing.*

*We have designated a Privacy Officer who is accountable for the organization's compliance with this Policy and all applicable legislation. This member is also part of our executive committee.*

*Cover-All, over our 40-year history has implemented numerous procedures to protect personal information, receive and respond to inquiries, and has trained and communicated to our staff in this regard.*

### **IDENTIFIED PURPOSES**

*Cover-All Computer Services Corp. only collects, uses, and discloses Personal information for specific purposes identified at the time of collection. This purpose is documented at that time (for example through Customer Agreements and Job specifications).*

### **CONSENT**

*Cover-All will make known to, and obtain the consent of an individual when collecting, using or disclosing information (unless not applicable or inappropriate to do so).*

### **LIMITING COLLECTION**

*The collection of information (including both the amount and the type) by Cover-All Computer Services Corp. shall be limited to that which is necessary for the identified purposes.*

### **LIMITING USE, DISCLOSURE AND RETENTION**

*Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.*

*Personal information shall be retained only as long as necessary for the fulfillment of the purposes.*

*Cover-All Computer Services Corp. has developed guidelines and implemented procedures with respect to the retention of personal information. This may include the destruction or return of the information or methods to make the information anonymous (i.e. samples). Cover-All also has procedures and guidelines regarding the destruction of personal information including both physical documents and electronic data.*

### **ACCURACY**

*Personal information shall be accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. Cover-All will not routinely update this information, unless such a process is necessary to fulfill the purposes for which the information was collected.*

## **SAFEGUARDS**

*Personal information shall be protected by security safeguards, appropriate to the sensitivity of the information. These safeguards shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.*

*Cover-All Computer Services Corp. shall protect personal information regardless of the format in which it is held.*

*Cover-All's security measures will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage. The more sensitive the information is, the higher the level of security.*

*Cover-All's methods of protection are extensive. They include, but are not limited to, physical security such as restricted access, video surveillance, and third party monitoring; organizational measures such as security clearances and limited access; and technological measures such as passwords and encryption.*

*Cover-All communicates to its employees, the importance of maintaining confidential information.*

*Cover-All ensures that care will be taken in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.*

## **OPENNESS, INDIVIDUAL ACCESS, AND COMPLIANCE**

*Cover-All Computer Services Corp. shall be open and make readily available to individuals, specific information about its policies relating to the management of personal information without unreasonable effort and in a form that is generally understandable.*

*Cover-All will provide such information as the accountable representative of Cover-All regarding Privacy, the method of inquiry, a description of information held, copies of policies and standards, and what information, if any, is made available to other organizations such as subsidiaries or affiliates.*

*Individuals will upon request, and within a reasonable time frame be informed of any personal information on hand and will be provided access to the personal information where it is appropriate and/or reasonable. Cover-All will amend any incomplete or inaccurate personal information as required.*

*Cover-All Computer Services Corp. will respond to, and investigate any complaint or inquiry regarding our policies and procedures relating to the handling of personal information. Where required, Cover-All will take corrective action.*