



Privacy Policy

1 INTRODUCTION

We take privacy seriously. In our business, that is built on trust and mutual respect, the safeguarding of the privacy of our clients, candidates, employees and other partners is paramount. We are committed to respecting the privacy rights of all individuals whose personal information has been collected by us.

TWC International Executive Search Ltd. (“TWC” or “We”) has established the guidelines that follow to provide a framework for the protection of your personal information. *In addition to the measures described within this privacy policy, as a matter of course, we treat all interactions with utmost discretion and confidentiality.*

2 FAIR INFORMATION PRINCIPLES

Our objective is to balance our need to collect, retain, use, disclose and dispose of personal information about individuals with the right to privacy of those individuals, and to ensure that all individuals are aware of the circumstances under which their personal information will be collected, retained, used, disclosed, and disposed of by us.

The Office of the Privacy Commissioner of Canada (OPC) is responsible for the oversight of both the Privacy Act and Part 1 of PIPEDA, which are acts that protect personal information entrusted to federal institutions and commercial organizations like TWC International, respectively. The OPC outlines a code that includes the following 10 *Fair Information Principles* that organizations must follow for the protection of personal information:

1. ACCOUNTABILITY

TWC will comply with the 10 principles outlined by the OPC through the development of, and adherence to, this privacy management program that includes, but is not limited to:

- The designation of a Chief Privacy Officer who has the senior management support and authority to intervene on privacy issues relation to any of TWC's operations;
- The communication of the name and/or title of the Chief Privacy Officer internally and externally to TWC, including via our website at www.twcinternational.com;
- The analysis and documentation of all personal information handling practices, including but not limited to the collection, classification, use, storage, security, accessibility, disclosure and disposal of personal information;
- The development, documentation and implementation of policies and procedures to protect personal information;
- The assessment of this privacy management program annually, at a minimum, and the resolution of any shortcomings;
- The publication of our privacy policies and procedures to clients, candidates, employees and other relevant parties.

2. IDENTIFYING PURPOSES

TWC collects personal information in the normal course of business to:

- Identify prospects and sources for ongoing and potential mandates;
- Contact potential candidates and sources during the course of an executive search or industry research project;
- Record our contact history with you;
- Develop future business prospects;
- Maintain customer relationships;
- Hire and assess TWC employees, and for payroll, taxation and benefits purposes;
- Complete background checks and references for employees and candidates; and,

- Provide information regarding TWC products and services, or to provide information related to our industry or the sectors that we cover.

This list may be modified at various times. If any new purpose for information that was previously collected is proposed, TWC will seek the individual's consent prior to using it.

Your information may also be aggregated with that of other individuals in non-attributed or aggregate form to generate industry data and statistics for reports and other internal or external purposes.

3. CONSENT

Consent can be either express or implied. Express consent is given explicitly, either orally, in writing or through a specific online action, such as clicking on "I agree". Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where consent may be reasonably inferred from the action or inaction of the individual.

The nature of the recruiting industry is such that, when an individual shares with TWC a resume or equivalent background document, contact details, compensation details, company information and other information related to an individual's career, role, experience, company and preferences, TWC will infer that consent has been granted to use this information to facilitate present and future contact, recruit for positions, assess suitability for positions, to discuss this information with our clients, and to provide candidates and clients with customary executive recruiting services.

By withdrawing consent to the collection and storage of relevant personal information as described above, TWC may be unable to provide customary recruiting services to either clients or candidates, if we have insufficient information to adequately assess your background or situation.

4. LIMITING COLLECTION

TWC will not collect personal information indiscriminately. We will limit the amount and type of information gathered to what is necessary for the purposes identified above. Personal information that we typically collect includes, but is not strictly limited to:

For prospects and candidates:

- Name
- Address(es)
- Phone Number(s)
- Email Address(es)
- Compensation details
- Educational history
- Career details including titles, dates, responsibilities, managers, direct and indirect reports, reasons for career transitions, aspirations, anecdotes and examples provided
- Reference comments

For clients and prospective clients:

- Name
- Address(es)
- Phone Number(s)
- Email Address(es)
- Title
- Related company information including reporting structures and organizational charts
- Career background information
- Customer satisfaction information
- Opinions about products and services

For TWC employees:

- Name
- Address(es)
- Phone Number(s)
- Email Address(es)
- Compensation details
- Educational history
- Career details including titles, dates, responsibilities, managers, direct and indirect reports, reasons for career transitions, aspirations, anecdotes and examples provided
- Social Insurance Numbers
- Bank account details
- Compensation and taxation history
- Reference comments
- Performance evaluations

5. LIMITING USE, DISCLOSURE AND RETENTION

We will limit the amount and type of personal information collected to that which is necessary for our identified purposes and we will retain personal information for only as long as necessary to satisfy the purpose for which it was collected.

We will permanently destroy, typically by shredding paper copies on premises or by erasing electronic files, information that is no longer required.

6. ACCURACY

TWC will minimize the possibility of using incorrect information when making a decision about an individual, or when disclosing information to third parties.

7. SAFEGUARDS

To safeguard your information from theft or loss, unauthorized access, disclosure, copying, use or modification, TWC has put in place physical, electronic and organizational security measures, including but not limited to:

- Monitored alarm systems

- Encrypted storage devices
- Password protection
- Physical deterrents, such as locks and other devices, on electronic equipment and files.
- Restricted office access
- Staff training regarding the handling of personal and sensitive information
- With third-party suppliers, contractual obligations to adhere to TWC's privacy standards

8. OPENNESS

We openly share with prospects, candidates, clients, prospective clients, and employees, our approach to our management of personal information.

All TWC employees are required to review, and acknowledge familiarity with, these policies.

Copies of our privacy policy are readily available on our website at www.twcinternational.com and can also be obtained by contacting our Chief Privacy Officer, whose contact details are included in *Section 3* of this document.

9. INDIVIDUAL ACCESS

Individuals have a right to access the personal information that TWC holds about them. On request by an individual, TWC will disclose the existence of any personal information on that person, and will explain if, and how, the information has been used. TWC will also provide a list of organizations to which the information has been disclosed.

We will also provide access to your personal information on file, and will correct or amend any inaccurate or incomplete information if found to be deficient.

We will provide a copy of information requested or provide reasons for not providing access. Reasons why we may deny access include:

- By revealing personal information to an individual, we may reveal personal information about another individual
- Release of the information would reveal confidential commercial information (unless this information can be severed, in which case you will be provided with the remainder of the information)
- Other reasons as described under PIPEDA

10. CHALLENGING COMPLIANCE

TWC endeavors to protect all personal information, and to abide by all aspects of this policy. However, should an individual have a privacy-related complaint or concern, TWC would be pleased to take appropriate measures to resolve the complaint in a timely manner.

On receipt of a written complaint, TWC will respond in writing (where possible) within seven (7) business days, to discuss next steps in the resolution of the issue.

3 COMPLAINTS

If, after reviewing the preceding information, you have any questions or concerns, please do not hesitate to contact us:

Chief Privacy Officer

Lisa Newey, Senior Director
TWC International Executive Search Ltd.
50 Richmond Street East
4th Floor
Toronto, ON M5C 1N7
Phone: 416-601-0306 x221
privacyofficer@twcinternational.com

If your issue has not been resolved by contacting our Chief Privacy Officer directly, you may also address your concerns to:

Office of the Privacy Commissioner of Canada
30 Victoria Street, 1st floor
Gatineau, QC K1A 1H3
Phone: 819-994-5444
www.priv.gc.ca