



Privacy Code

Introduction

Davis + Henderson is committed to keeping customers' personal information accurate, confidential and secure. The Davis + Henderson Privacy Code explains this commitment in detail.

The Davis + Henderson Privacy Code is based on the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information and the Federal Personal Information Protection and Electronic Documents Act ('PIPEDA').

The Scope of this Code

The Privacy Code includes the principles upon which Davis + Henderson acts to protect the privacy of individual customers' personal information in the carrying out of commercial activities in Canada – no matter how the information is collected, used or disclosed.

The Ten Principles of Privacy

Principle #1: Accountability

Davis + Henderson is accountable for all personal information in its possession or custody, including any personal information disclosed to third parties for fulfillment of your order. Davis + Henderson has established policies and procedures to comply with this Code and has designated a Privacy Officer accountable for compliance.

Principle #2: Identifying the Purposes of Collecting Personal Information

Davis + Henderson will identify the purposes for which it collects personal information, at the time of or prior to the collection of such information.

Principle #3: Getting the Customer's Consent

Davis + Henderson will make a reasonable effort to ensure customers understand how their personal information will be used. Davis + Henderson will obtain consent from its customers at the time of, or prior to, the collection or use of personal information. Davis + Henderson will not attempt to deceive a customer into giving consent.

A customer's consent can be expressed or implied or given through an authorized representative. A customer can withdraw consent at any time.

Principle #4: Limits for Collecting Personal Information

Davis + Henderson limits the amount and type of personal information it collects. Davis + Henderson will collect personal information for the purposes it identifies to the customer. Davis + Henderson collects personal information using policies and procedures which are fair and lawful.

Principle #5: Limits for Using, Disclosing and Keeping Personal Information

Davis + Henderson will use or disclose personal information only for the reasons it was collected.

Davis + Henderson will keep personal information only for purposes identified and only for as long as it is required.

Principle #6: Keeping Personal Information Accurate

Davis + Henderson will keep personal information as accurate and complete as necessary to meet the needs for which it was collected.

Since personal information is only collected for the purpose of fulfilling and servicing an order, information will not be routinely updated until a new order request is received.

Principle #7: Safeguarding Personal Information

Davis + Henderson protects personal information with safeguards appropriate to the sensitivity of the information.

Principle #8: Making Information about Policies and Procedures Available to Customers

Davis + Henderson is open about the policies and procedures it uses to manage personal information. Customers have access to information about these policies and procedures. The information will be made available in a manner that is generally easy to understand.

Principle #9: Customer Access to Personal Information

When customers make a request in writing, Davis + Henderson will, within a reasonable time, advise what personal information is on file and the manner in which it is used.

Principle #10: Handling Complaints and Questions

Customers may challenge Davis + Henderson's compliance with this Code. Davis + Henderson has policies and procedures to receive, investigate, and respond to customers' complaints and questions.