

# AVAC PRIVACY POLICY

## 1. **Commitment**

1.1 AVAC is committed

- (a) to the privacy principles set out in the Personal Information Protection Act (PIPA),
- (b) to PIPA's rules about collecting, using and disclosing Personal Information,
- (c) to endeavour to balance:
  - (i) an individual's rights to have his or her Personal Information protected;
  - (ii) AVAC's needs to collect, use or disclose Personal Information that are reasonable.

1.2 We are also committed to fulfill individuals' right under PIPA to ask us to show them the Personal Information we have about them and to ask for the information to be corrected if they think a mistake has been made.

## 2. **Privacy Policy Manual.**

2.1 This Privacy Policy should be read in conjunction with our Privacy Policy Manual which sets out our privacy policy and procedures in more detail *[insert link]*; this Policy is the summary of the details that appear in our Privacy Manual. Words defined in the Privacy Manual apply here.

## 3. **General Principle**

3.1 We will collect, use and disclose Personal Information only for purposes that are reasonable under the circumstances and will obtain consent for the collection, use and disclosure of that information either expressly or, where appropriate, by implication. These purposes will be disclosed by this Privacy Policy, our Privacy Manual, privacy policies that are subordinate to this Privacy Policy, by consent forms, by oral exchanges or by the circumstances giving rise to the collection.

## 4. **Accountability**

4.1 AVAC has appointed as privacy officer the individual who holds the title of Vice President, Investment. This Privacy Officer is the individual responsible for administration of this Privacy Policy. In carrying out our obligations under this Privacy Policy, we will do what a reasonable person would think was appropriate under the circumstances.

## **5. Consent**

5.1 Before AVAC collects, uses, or discloses Personal Information, we will ask the individual that the information is about to consent to the collection, use and disclosure of the Personal Information, unless consent can be implied by the circumstances

## **6. Collecting Personal Information**

6.1 We will only collect Personal Information for purposes that are reasonable and we will only collect the information that is reasonable to carry out those purposes.

## **7. Using Personal Information**

7.1 We will only use Personal Information for purposes that are reasonable and we will only use Personal Information that is reasonable to carry out those purposes.

7.2 We may use or disclose Personal Information when we are required by law to do so or such disclosure is permitted by PIPA.

7.3 We do not make our contact data base available to other organizations for their use.

## **8. Collecting, Using and Disclosing Personal Employee Information**

8.1 Our Privacy Manual sets out special rules for Personal Employee Information which will not be summarised here.

## **9. Giving access to and Correcting Personal Information**

9.1 Upon request and when required by privacy protection law, we will give an individual or his or her authorized representative (an "Applicant") access to his or her Personal Information in a record that is in our custody or under our control. We will also let the Applicant know what the information is being, and has been, used for and how and under what situations the information is being or has been disclosed by us. We may require an Applicant to use our Access Request Form.

## **10. Accuracy**

10.1 We will take reasonable measures to ensure that Personal Information used or disclosed by us will be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual

## **11. Protection**

11.1 We will use reasonable security safeguards to protect Personal Information as required by PIPA such as risks of loss or theft, unauthorized access, disclosure, copying, use, modification or destruction. We will protect information regardless of the format in which it is kept and used.

**12. Retention**

12.1 We will keep Personal Information only so long as it remains necessary or relevant for the identified purposes or as required by law.

**13. Monitoring/Reviewing the Operation of this Policy**

13.1 We will review this Policy at regular intervals to ensure that it is still serving its stated purposes; that it is being complied with; that the internal complaint handling procedure is still effective; and to determine if there are any amendments that should be made to improve the operation of this Policy.

**14. PIPA and this Policy**

14.1 Nothing in this Policy is intended to restrict an individual's rights under PIPA or extend AVAC's obligations under PIPA. In the event of any conflict between this Policy and PIPA, the provisions of PIPA shall prevail.