

NORCAT PRIVACY POLICY

At NORCAT, we are dedicated to protecting your privacy and safeguarding your personal information. In fact, it is one of our highest priorities and remains the cornerstone of our commitment to you. However you choose to provide information to us, we use vigorous security safeguards and adhere to Ten Privacy Principles to ensure your personal information is protected.

Our Ten Privacy Principles

NORCAT has always been and will continue to be, committed to maintaining the accuracy, confidentiality, and security of your personal information. As part of this commitment, we have Ten Privacy Principles to govern our actions as they relate to the use of client information. NORCAT invites you to review their principles, which have been built upon the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information and Canada's Personal Information Protection and Electronic Documents Act*.

Principle 1 - Accountability

Principle 2 - Identifying Purposes

Principle 3 - Consent

Principle 4 - Limiting Collection

Principle 5 - Limiting Use, Disclosure and Retention

Principle 6 - Accuracy

Principle 7 - Safeguarding Client Information

Principle 8 - Openness

Principle 9 - Client Access

Principle 10 - Handling Client Complaints and Suggestions

Principle 1 – Accountability

NORCAT is responsible for maintaining and protecting the client information under its control. In fulfilling this mandate, NORCAT has designated an individual or individuals who is/are accountable for the Company's compliance with the Ten Privacy Principles.

Principle 2 - Identifying Purposes

The purposes for which client information is collected shall be identified before or at the time the information is collected.

Principle 3 - Consent

The knowledge and consent of the client is required for the collection, use or disclosure of client

information except where required or permitted by law or where implied use by participating in NORCAT's services being provided to you.

NORCAT uses also include disclosing information about your certification to others such as an employer or prospective employer.

Principle 4 - Limiting Collection

Client information collected must be limited to those details necessary for the purposes identified by NORCAT. Information must be collected by fair and lawful means.

Principle 5 - Limiting Use, Disclosure and Retention

Client information may only be used or disclosed for the purpose for which it was collected unless the client has otherwise consented, or when it is required or permitted by law. Client information may only be retained for the period of time required to fulfill the purpose for which it was collected.

Principle 6 - Accuracy

Client information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 - Safeguarding Client Information

Client information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 - Openness

NORCAT is required to make information available to clients concerning the policies and practices that apply to the management of their information.

Principle 9 - Client Access

Upon request, a client shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Clients may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate.

Principle 10 - Handling Client Complaints and Suggestions

Clients may direct any questions or enquires with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy at: *privacy@norcat.org*, or at our offices at 1545 Maley Drive, Sudbury, Ontario.

What Information is Collected

At NORCAT, we gather and use personal information to provide you with the services you have requested, or to offer additional products and services we believe you might be interested in. Providing us with your personal information is always your choice. Most of the information we collect comes to us directly from you, and only with your consent. For example, when you request products or enroll for a service online, through telephone or in person, we will ask you to provide the information that enables us to complete your request or to provide you with better service.

The types of information we may ask for depends on the nature of your request. Information that is essential for fulfilling our responsibilities typically includes your name, mailing address, e-mail address, phone number(s) and date of birth. We may also request additional information to help us provide you with advice and information about other products and services that we believe would interest you.

When you visit NORCAT Web sites, information is not collected that could identify you personally unless you choose to provide it voluntarily. You are welcome to browse these Web sites at any time anonymously and privately without revealing any personal or financial information about yourself.

When Information May be Disclosed to Outside Parties

At NORCAT, we are obliged to keep your personal information confidential except under the following special circumstances:

- When Authorized by You
- When Required by Law
- When Permitted by Law

When Authorized by You

Client Agreement - A Client Agreement or notification at time of services outlines the terms and conditions associated with acquiring specific products or services from NORCAT. In general, it establishes the rights and obligations of both parties as they relate to the provision of that product or service.

When Required by Law

In some instances such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities who are making the request have legitimate grounds to do so.

When Permitted by Law

There are some situations where we are legally permitted to disclose personal information.

With Whom We May Share Your Information

NORCAT, their employees and service suppliers are all governed by strict standards and policies to ensure your information is secure and treated with the utmost care and respect.

At NORCAT, client information is strictly confidential. With your consent we will share information with other NORCAT businesses or suppliers who perform services on our behalf. Unless you authorize us to release it, or release is required or permitted by law, we never sell, lease or trade information about you or your accounts to other parties.

Our Employees

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it. For example, when you call us, visit us, or e-mail us, our designated employees will access your information to verify that you are the client and to assist you in fulfilling your requests. As a condition of their employment, all employees of NORCAT are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behavior as set out in our internal Employee Rules and must follow all applicable laws and regulations. Employees are informed about the importance of privacy and they are required to sign either a code of conduct or a confidentiality agreement that prohibits the disclosure of any client information to unauthorized individuals or parties.

Unauthorized access to and/or disclosure of client information by an employee of NORCAT is strictly prohibited. All employees are expected to maintain the confidentiality of client information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

Outside Service Suppliers

At [NORCAT](#), we sometimes contract outside organizations to perform specialized services such as third party training. Our trusted service suppliers may at times be responsible for processing and handling some of the information we receive from you.

When we contract our suppliers to provide specialized services, they are given only the information necessary to perform those services. Additionally, they are prohibited from storing, analyzing or using that information for purposes other than to carry out the service they have been contracted to provide. In fact, our suppliers who have access to confidential personal information are bound by strict contractual obligations that have been designed to protect the privacy and security of your information. Furthermore, as part of our contract agreements, our suppliers and their employees are required to protect your information in a manner that is consistent with the privacy policies and

practices that we have established.

How You Can Protect Your Information

At NORCAT, we do our utmost to protect and safeguard your personal and financial information. We believe there are measures you should take as well. The following is a list of things you can do to protect yourself against fraud and uninvited intrusion.

Passwords

Passwords are necessary to identify you and authenticate your permission to access your accounts. When you enroll in online services, the passwords you use are encrypted. Encryption is presently the most effective way to achieve data security. Just as it is important for us to employ strict procedures to safeguard your information, you also should take precautions in handling your passwords. When selecting a password, we suggest that you use a combination of letters and numbers and do not use words that can be easily associated with you such as the name of a family member, a pet or the street on which you live. We also suggest that you change your password regularly.

Personal Information

You should not share personal information with others unless you clearly understand the purpose of their request and you know with whom you are dealing.

Online Security

To make sure your connection to the protected areas of NORCAT Web sites are secured, look for either a 'closed lock' or an 'unbroken key' icon located at the bottom right hand side of your browser's task bar. You may also check the address bar to determine if SSL (Secure Socket Layer) is active by looking at the beginning of the address. If it starts with "https" rather than the standard "http", then SSL is operating.

Accessing and Amending Your Information

At NORCAT, decisions are often made based on the information we have. Therefore, it is important that your personal and financial information is accurate and complete. As a client, you have the right to access, verify and amend the information held in your personal files.

Accessing Your Information

You may access and verify any of your information by contacting NORCAT at privacy@norcat.org, visiting our location where our services were provided or contacting our offices at 1545 Maley Drive, Sudbury, Ontario.

Amending Your Information

To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our best efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file(s), we will make the proper changes and provide you with a copy of the corrected information. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

To Make a Change

To make a change to the personal contact information contained in your file, please contact NORCAT at privacy@norcat.org, visit our location where our services were provided or contact our offices at 1545 Maley Drive, Sudbury, Ontario.

What is a Cookie?

A cookie is a small text file containing a unique identification number that a Web site sends to your computer's web browser. While you visit a particular site, a cookie may be used to track the activities of your browser as well as provide you with a consistent, more efficient experience. There are two common types of cookies: persistent and non-persistent.

Persistent cookies - Persistent cookies are stored on your computer's hard drive where they remain resident until they are either deleted or they reach a predetermined expiration date. Persistent cookies are most commonly used to provide visitors with a customized experience by recording preferences such as how a visitor prefers to have his/her web pages displayed. Additionally, cookies are commonly used to gather statistical information such as the average time spent on a particular page. This kind of information is valuable for several reasons, including providing insight on how to improve the design, content and navigation of a Web site.

Non-persistent cookies - Non-persistent cookies do not permanently record data and they are not stored on your computer's hard drive. Rather, non-persistent cookies are stored in memory and are only available during an active session. Once a session ends, the cookie disappears. Non-persistent cookies are used primarily for technical reasons such as providing seamless navigation. For example, secure NORCAT

Web sites use non-persistent cookies in order to permit visitors to navigate through the pages without requiring them to log on to each additional page they wish to visit.

Why Were Cookies Created?

The World Wide Web uses the Hypertext Transfer Protocol (HTTP) to govern how files such as graphics, text and sound are exchanged over the Internet. This protocol treats every action (i.e.

mouse clicks) independently making the nature of the Web 'stateless'. This means that every time you click on a new page for instance, a new connection is established and all previous activity is forgotten.

To provide visitors with a more uniform experience, cookies were used originally to maintain relevant information as visitors viewed various pages of a Web site. In effect, cookies were created to bring state and consistency to the 'stateless' environment of the Internet.

How do Cookies Work?

The first time you visit a Web site, you may be sent a cookie that contains a unique identification number that can be easily retrieved during future visits. Cookies are used for different purposes such as to personalize the way you want a Web site to look.

When you type the Web site address in the address bar of your browser, your browser will contact the site you've entered and request its home page. The browser will search your hard drive for a cookie that may have been sent during a previous visit. If a cookie is found, the browser will send any information gathered from a previous visit to the web server. If a cookie is not found, then the browser will know you have not visited the site before.

On NORCAT Web sites, cookies are used to increase the robustness of these sites and to provide more efficient navigation. Cookies cannot view or retrieve data from other cookies, nor can they capture files and data stored on your computer.

Questions

If you have a question about the privacy policies stated on this site, please call us at 705-521-8324, email us at privacy@norcat.org or visit our location at 1545 Maley Drive, Sudbury, Ontario. If you have a concern or complaint about privacy, confidentiality or the information handling practices of NORCAT, our employees or service suppliers, please bring your concern to our attention by contacting our C.E.O.