



LAW OFFICES OF BRIMAGE LAW GROUP POLICY RESPECTING PRIVACY

The Law Offices of Brimage Law Group recognize the importance of privacy and the sensitivity of personal information. As lawyers we have a professional obligation to keep confidential all information we receive within a lawyer-client relationship. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

Your Privacy Rights

From January 1, 2004, all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to lawyers and law firms, including the Law Offices of Brimage Law Group. The Act gives you rights concerning the privacy of your personal information. The Law Offices of Brimage Law Group are responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy, and trained our lawyers and support staff about our policies and practices.

Why Do The Law Offices of Brimage Law Group Need Personal Information?

The Law Offices of Brimage Law Group provides legal services and products to a wide range of clients. In doing so, we collect information:

- a) to establish and maintain responsible client relationships, to administer ongoing client agreements and to provide ongoing services;
- b) to understand client needs;
- c) to develop, enhance, promote, market or provide services and support;
- d) to manage and develop our business and operations; and
- e) to meet our legal obligations.

What personal information do we collect?

Personal information is any information that identifies you, or by which your identity could be deduced. If we did not collect and use your personal information we could not provide you with legal services.

How do we collect your personal information?

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect your personal information directly from you, at the start of a retainer and in the course of our representation. Sometimes we may obtain information about you from other sources: for example,

- your real estate agent in a property transfer
- from police services;
- from medical personnel;
- from a government agency or registry;
- from a community service agency;
- your accountant.
- your insurance company

Consent

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally, we ask for your consent in writing, but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us.

Use of Your Information

We use your personal information to provide legal advice and services to you and to administer our client (time and billing databases). The Law Offices of Brimage Law Group do not disclose your personal information to any third party to enable them to market their products and services. For example, we do not provide our client mailing lists to other law firms.

Disclosure of your Personal Information

Under certain circumstances, the Law Offices of Brimage Law Group will disclose your personal information:

- where required by our insurer, the Lawyers' Professional Indemnity Company (LAWPRO)
- when we are required or authorized by law to do so, for example if a court issues a subpoena;
- when you have consented to the disclosure;
- when the legal services we are providing to you requires us give your information to third parties (for example a private investigator hired to assist in your case) your consent will be implied, unless you tell us otherwise;
- where it is necessary to establish or collect fees;

- if we engage a third party to provide administrative services to us (like computer back-up services or archival file storage) and the third party is bound by our privacy policy;
- if we engage expert witnesses on your behalf;
- if we retain other law firms in other jurisdictions, on your behalf;
- if the information is already publicly known.

Updating Your Information

Since we use your personal information to provide legal services to you, it is important that the information be accurate and up-to-date. If during the course of the retainer, any of your information changes, please inform us so that we can make any necessary changes.

Is My Personal Information Secure?

The Law Offices of Brimage Law Group take all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- restricted file access to personal information;
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

Access to Your Personal Information

You may ask for access to any personal information we hold about you. Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

Correcting Errors

If the Law Offices of Brimage Law Group hold information about you and you can establish that it is not accurate, complete and up-to-date, we will take reasonable steps to correct it.

Can I be Denied Access to My Personal Information?

Your rights to access your personal information are not absolute. We may deny access when:

- denial of access is required or authorized by law (for example, when a record containing personal information about you is subject to a claim of legal

- professional privilege by one of our clients);
- information relates to existing or anticipated legal proceedings against you;
- when granting you access would have an unreasonable impact on other people's privacy;
- when to do so would prejudice negotiations with you;
- to protect our firm's rights and property;
- where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we shall explain why.

The Law Offices of Brimage Law Group do not use your Social Insurance Number as a way of identifying or organizing the information we hold upon you. We will not request your Social Insurance Number from you, unless we are retained to defend you against a claim involving Canada Customs and Revenue or the Employment Insurance Commission of Canada.

Can I request anonymity?

Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name (for example, by accessing general information on our website).

The Proceeds of Crime (Money Laundering) and Terrorist Financing Act requires us to confirm the identity of all new clients. It may also require us disclose information to FINTRAC in relation to certain large cash transactions.

Credit Bureaus

To help us make credit decisions about clients, prevent fraud, check the identity of new clients and prevent money-laundering, we may on occasion, request information about you from the files of consumer reporting agencies.

Communicating with Us

You should be aware that e-mail, cordless phones and cell phones are not 100% secure mediums, and you should be aware of this when contacting us to send personal or confidential information.

Changes to this Privacy Policy

Since the Law Offices of Brimage Law Group regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

Requests for Access

If you have any questions, or wish to access your personal information, please write to our Privacy Contact at 21 Norfolk Street N., P.O. Box 188, Simcoe, Ontario N3Y 4L1

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street,
Ottawa Ontario, K1A 1H3
1.800.282.1376

Employment Inquiries

If you apply to the Law Offices of Brimage Law Group for a job, we need to consider your personal information, as part of our review process. We normally retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

Web Site

- Our website contains links to other sites, which are not governed by this privacy policy. On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We do not provide any aggregated or other information to third parties. However, be aware that other web sites including your Internet Service Provider may track information about you that may include identifiable personal information. Please refer to their privacy policy for details.
- We do not collect nor store domain names. We do not store nor record the e-mail address of visitors to our Web presence (unless input by the visitor). We also do not store and analyze aggregate information on what pages people access or visit.
- If a visitor supplies us with their personal information (eg. address) on-line, they will only receive information in relation to the use for which they provided us their personal information.
- We store e-mail addresses and correspondence of those who communicate with us via e-mail. If a visitor has submitted e-mail to us they will only receive information in relation to the use for which they provided us their personal information.
- Persons who supply us with their telephone numbers on-line may receive calls from us regarding their inquiries they have submitted on-line.
- When visitors link from www.brimage.com to another web site, the privacy policy of the other web site applies and will be tailored to that web site, even though the universal resource locator (URL) continues to www.brimage.com.