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PIPEDA Policy

Accountability

- REM appoints Ryan Covert as the privacy officer in charge of all compliance and governance concerns regarding the storage of personal information within REM's infrastructure. The REM team has been instructed to direct all information privacy concerns directly to Ryan to ensure a concise response is provided.

Checklist

What personal information do we collect and is it sensitive?

- REM collects personal information on behalf of its customers to enable the use of tools such as ecommerce, newsletters, and secured content.
- REM never collects credit card or bank related data on behalf of any customers. Sensitive data of that nature is always handled by a third-party service such as PayPal.

How do we collect it?

- REM collects data solely through its custom content management system (CMS) named WebWiz@rd.
- Data is collected via forms built for online websites where users submit their data for use by our customers' websites.

What do we use it for?

- Our customer web applications are developed to gather and store data pertinent to the operation of each customer's custom business rules, such as the storage of customer information related to ecommerce sales and operations.
- REM only collects data specific to the needs of its customers.

Where do we keep it?

- Personal information related to custom web applications for our customers is always stored in Microsoft SQL Server Databases.

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How is it secured?

- All personal data stored on REM's database servers is secured and only accessible by key members of the REM team.
- Web applications built to store personal information utilize SSL technology to prevent unauthorized access to customer data.
- Our databases are not directly accessible via the internet. Data stored and retrieved by our systems travels over an internal connection between the services to ensure the raw data is never exposed to the general public.

Who has access to or uses it?

- REM's internal development and IT teams are the only individuals responsible with maintaining the use and integrity of the data stored within REM's infrastructure.
- REM's customers also have access to only their own data through tailored experiences to make information gathering simple and efficient.

Who do we share it with?

- Data gathered for use in ecommerce web applications is shared with third-parties such as PayPal, Canada Post, and Purolator. Only data required by those organizations to operate is shared with them, such as names, email addresses, and shipping address information.

When is it disposed of?

- REM destroys all data stored on behalf our customers when a project is closed.
- REM also destroys data at the request of customers.
- Users that visit our customer's web applications can also request the deletion of their own personal data at any time.

Policies and Procedures

Purpose of Collection

- REM only collects personal data for the purpose of ensuring business rules are maintained for our customers.

Consent

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- REM's customers are required to sign over the consent for REM to collect data on their behalf to ensure the operation of their business rules within REM's custom web applications.

Limited Collection, Use and Disclosure

- REM only collects and uses the data directly related to the customer's business requirements. These requirements are outlined at the start of a project and are adhered to through to the completion of any and all web applications built on behalf of our customers.
- REM discloses the use of all data to its customers and does not disclose use to third parties.

Ensuring Correct, Complete and Current Data

- Personal data stored in REM's databases can be updated at any time by way of scheduled data import routines or users updating their personal data through secure web applications.

Retention and Destruction Timetable

- REM removes personal data from its databases related to any web applications taken offline. This happens immediately following the notification that a web application is no longer needed by the customer.

Response to Complaints, Inquiries and Requests to Access Personal Information

- Ryan Covert acts as the front-line advocate for all requests related to personal information storage. He ensures that the requests are filtered through to the appropriate team within REM so that the requests can be dealt with promptly.

Data Breach and Incident Management Policy

- Upon the discovery of any possible data breach, REM will reach out the affected parties to ensure an open line of communication is maintained.
- REM will deliver a report to all necessary parties that includes a definition of any affected data as well as steps taken to ensure the incident does not reoccur.

Risk Assessment

- REM conducts regular risk assessment routines any time one of the following events occurs:
    - Changes to electronic infrastructure
    - Changes in personnel
    - System failures

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Third Party Service Providers

- REM only leverages third-party services from providers with a proven track record of safety and privacy of data.

Training

- REM provides all employees within the organization with training regarding the privacy policy of personal information stored within our infrastructure.

Availability

- This policy document is available on our website as well as by request to any individual.

Identifying Purposes

How We Identify Purpose

- At the onset of any project, REM outlines the data that will be required to request from our customer's users.
- REM provides an adequate amount of communication to users to ensure they are aware of why their personal data is being requested in every web application.

Consent

How We Collect Consent

- REM keeps record of all consent given to store personal information within our customer's databases.
- This is achieved via the presence of a record creation date for every personally identifying piece of information stored in each database.

Limiting Collections

How We Limit Collection

- REM only stores the information required to meet the business requirements of our customer's web applications.
- No further personal information is stored about users visiting the web applications.

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Limiting Use, Disclosure, and Retention

How We Limit Use, Disclosure, and Retention

- REM only allows key members of its team to access personal information on a needs basis.
- Disclosure of personal information to third-parties is only ever provided with the express consent of the user at the time it is requested.
- Data is retained for historical reporting purposes and destroyed at the closure of a project or at the request of a user or the customer.

Accuracy

How We Maintain Accuracy

- REM only stores data for use at the time it is created or last updated.
- Users are always given the opportunity to update their personal information while using the systems developed by REM that store their personal data.

Safeguards

How REM Safeguards Personal Data

- REM employs the use of up-to-date technological tools and limited access to personal data.
- REM encrypts passwords and stores all data in databases not accessible by any persons or devices outside of our trusted network.

Openness

Policy Availability

- REM provides access to this policy through multiple channels, including on our website at https://remwebsolutions.com as well as by request to any interested parties.

Individual Access

Expected Timeframe

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- REM attempt to respond to all requests for personal information or its removal within the 30 day limit imposed by the law.
- However, REM typically has turnaround time of less than 1 business day for most small requests of this nature.
- REM will format the information in a manner which is most suitable to the party making the request.

Challenging Compliance

Our Responsibility

- REM grants all parties the ability to challenge our compliance regarding the policies outlined in this document as well as any other guidelines found in the PIPEDA documentation available at https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/