

BOWEN Privacy Policy

Introduction

This Privacy Policy outlines the principles and practices we follow to protect all personal data that is collected from our clients, candidates and employees, or that is provided to us via the BOWEN website and/or other websites that BOWEN utilizes.

Please ensure that you read the following information carefully so that you understand BOWEN's practices regarding the collection and use of your personal data.

BOWEN has a Privacy Officer who is responsible for overall privacy governance. We manage your personal information in accordance with all applicable laws. All BOWEN employees are trained and responsible to maintain your privacy in the context of providing services to you.

In order to keep up with changing legislation, this policy may be updated periodically without notice. Please note that this policy does not apply to the practices of companies which are not owned or controlled by BOWEN.

What is Personal Information?

Candidate Information:

In order for us to assist you and our clients in the most effective way and to effectively attempt to secure the best, most suitable position for you, we require certain information about you. We will obtain some of this information from you, and will obtain other information from external sources.

Type of information includes:

- Resume information including name, address, contact details, education, skills, and previous work experience.
- Interview notes.
- Reference and background check information related to work experience, qualifications, character, skills, and personality.
- Additional information including but not limited to educational records, criminal record checks, drug and alcohol testing as well as fit for work assessments, when required by the position and results of specialized testing or professional designation testing.
- Payroll information including periods of employment, position, SIN, gender, date of birth, emergency contact information, banking information, driver's abstract, hours of work, overtime hours, wage and overtime rates, tax credits, vacation, taxable benefits, and deductions made.
- Benefits information including: dependent information, marital status, beneficiary information, spousal insurance coverage, and provincial personal health numbers.
- Garnishee information including: documentation of garnishment, garnishee amounts/percentages, requirements, and maximums.
- Health and safety information including: WCB Medical certificates, details of incidents/accidents in the workplace, relevant medical information, and modified duties provided.
- Client feedback information including: evaluations and disciplinary letters/issues.

Client Information:

Business name, address, business contact details, contact names, personal information pertaining to contacts, order forms, surveys, correspondence, accounting information including credit checks, and applications.

Why We Collect Personal Information

BOWEN delivers employment services to clients and candidates. In order to deliver these services, a variety of information must be collected about an individual that is considered to be “personal information.” Personal information is specifically collected in order to provide BOWEN services to our candidates, employees and clients.

How Does BOWEN Obtain Consent to Use My Personal Information?

Having agreed to use BOWEN services and providing your personal information, your consent to the collection, use and disclosure of your personal information as specified in this Policy is implied.

Your consent is also implied to use and disclose your personal information for purposes that are reasonable and are obvious and/or necessary in using BOWEN services.

Although BOWEN implies your consent in any event, BOWEN may seek your express consent to contact your references, to collect, use and disclose information that is obtained from your references and for your references to disclose that information to BOWEN. In granting your consent for these purposes you also release, remise and forever discharge, to the fullest extent possible at law without limitation, and agree to fully indemnify your references and BOWEN Workforce Solutions Inc. from and for any and all legal, financial and other liability, loss or damage whatsoever flowing from that information or its collection, use or disclosure.

At any point after engaging in BOWEN services, you may withhold your consent; however, doing so might limit the possible positions or placements for which you are considered.

What If I Choose Not to be Bound by the Conditions Within the BOWEN Privacy Policy?

If you do not agree to the manner in which BOWEN collects and uses your data, as described within the Policy, please refrain from submitting any personal data to us.

Who Accesses and Uses My Personal Information?

In general terms, we will collect, use and disclose your personal information in order to deliver BOWEN services to you and/or as required to meet legal and regulatory requirements.

Decisions on the collection, use, disclosure, and retention of data are shared by the Management Team and the Privacy Officer. The Privacy Officer also deals with any complaints concerning privacy issues.

It is the responsibility of all BOWEN employees to protect the privacy of all candidates, employees, and clients.

Your personal information is never sold or traded by BOWEN to any external organization.

Who Is Personal Information Disclosed To?

We share all personal information in the normal course of our business. We disclose your personal information to our clients when we feel that there is potential for a job placement with that client; either when there is a specific job opening to which you are well-suited or when we reasonably believe that such a position may be available or may be coming available. As a job-seeker you rely on us to share your information in this way so as to provide the best placement services possible both to you and to our clients who may wish to hire you.

Personal information and references regarding candidates is added to our database and it is used to place candidates in positions at our client sites. This information may be used by any internal staff member and may be sent to clients interviewing potential candidates for positions.

We may also share some information we have collected about you with organizations that perform testing or background checks, including criminal, educational and driving records. These organizations may be the agencies themselves that provide the check results or may be intermediary agencies to whom we out-source this work. Some of these checks are expressly required by our clients who are considering you for a placement; others are initiated by BOWEN as part of our due diligence prior to recommending you for a placement.

How Will the Information Be Used?

BOWEN will collect data about you, both personal data such as your name and contact details as well as information that is contained in your resume. This data will be stored, processed, used and disclosed by BOWEN in the following ways:

- To enable you to submit your resume or apply online for jobs that may be of interest to you
- To meet our obligations arising from any contracts entered into between BOWEN and you
- To provide recruitment services to you and to facilitate the recruitment process
- To assess data about you against work assignments that BOWEN assess could be suitable for you
- To send your information to clients in order to apply for jobs or to assess your eligibility for assignments
- To allow you to participate in interactive features of our service when you choose to do so
- To verify your identity prior to answering your questions and enquiries
- To third parties who perform functions on BOWEN's behalf and who also provide services to the company. These include professional advisors, IT consultants, research and marketing firms and outsourcing partners
- To regulatory or law enforcement agencies as required by law to disclose it in connection with the detection of a crime, the collection and remittance of taxes, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings

We may also use your personal information to assist us in improving our overall service to our candidates like yourself and to our clients.

BOWEN may also use your personal information for other uses and purposes from time to time, always acting reasonably.

Who Is Responsible for the Personal Data That You Provide to Us?

BOWEN will use all reasonable endeavors to ensure that your Personal Information is accurate. It is your responsibility to inform BOWEN of any and all changes to your Personal Information to ensure that it is up to date. You may request access to review the personal information held by BOWEN.

Sending Us Information Over the Internet

Although BOWEN will be diligent in the protection of your personal data, BOWEN cannot guarantee the security of your data transmitted to the BOWEN website therefore any transmission is at your own risk. The transmission of information via the internet is not absolutely secure.

We always use industry-standard encryption technologies when receiving and transferring consumer data exchanged with our Sites.

We also collect information about the way jobseekers and visitors use this website in order to improve our services. We do not use information gained in this way in a way that any individual can be identified, and only

use it to understand our users better, and to determine aggregate trends, most popular pages, etc, for all the website's users.

Links to Other Websites

Please note that clicking on links and banner advertisements and RSS feeds may result in your transfer to another website, where data privacy practices may be different to this Privacy Policy. It is your responsibility to check other website privacy policies to ensure that you agree to your personal information to be used in accordance with those third parties privacy policies. BOWEN does not accept any responsibility for and does not have control over third party websites, links, advertisements or RSS feeds or information that is submitted or collected by third parties.

Where Is My Personal Information Stored and How Is It Kept Secure?

The personal information you provide us may be accessible by BOWEN employees, clients and 3rd party vendors who support BOWEN in our provision of services.

Storage of paper-based personal information is maintained in our offices, along with external secured storage facilities. Electronic information is stored in our computer systems with back-up stored off-site.

In order to protect the privacy of our employees, candidates, and clients, we have various levels of security in place including physical, administrative, and technical safeguards.

How Long Will You Hold My Information For?

BOWEN is required by law to hold your information for as long as is necessary to comply with all applicable regulations and contractual obligations.

We retain your information as long as you are using our placement services, or longer if required by law. For contractors, that means we retain all your information as long as you remain on our payroll, and for seven years thereafter.

Other payroll, garnishee, and employee information is kept on file according to federal and provincial legislation requirements.

Client information that is considered public domain and does not contain any personal information is kept on file for an indefinite period of time.

All paper files are destroyed through confidential shredding services. Electronic files and discs are destroyed by the Information Services department to ensure proper deletion of data prior to outdated discs being disposed of.

How Can You Access Your Personal Information and Verify Its Accuracy?

In the event that you need to access or make a request to correct your personal information on file a written request must be made to the Privacy Officer.

The request must specify your name and at least two personal identifiers such as employee number, SIN, date of birth, etc., in order for BOWEN to verify your identity and to locate the appropriate files. A response will be provided within 30 days of receipt of the request. Where possible, all information will be provided to persons requesting their information although some information may not be provided.

We may refuse access to information:

- If doing so would reveal information about a third party,
- If doing so would reveal confidential commercial information,
- If doing so would threaten life/security of another, or
- If information was generated in course of a formal dispute resolution process.

- Information contained in references will not be disclosed. If you require clarification of a reference provided to BOWEN, you must contact the individual who provided the reference.

In the event you wish to request a correction to your personal information, please know factual information will be changed where appropriate, but opinions noted on file cannot be changed. A response will be provided within 30 days of receipt of the request.

What Can You Do If You Wish To Withdraw Your Consent?

A revocation of consent must always be provided to BOWEN in writing.

You may withdraw any express consent you previously gave as part of registering for our services at any time upon giving proper written notice to BOWEN.

If you wish to withhold or subsequently withdraw your consent in regards to any of the matters to which BOWEN implies your consent under the terms of this Privacy Policy, it is incumbent upon you to inform BOWEN of that in writing in sufficient detail and with sufficient clarity for BOWEN to identify precisely the point to which you do not consent. BOWEN will then evaluate and advise you whether it is possible to provide or to continue to provide services to you as a candidate.

How BOWEN Collects and Aggregates Information About Visitors to Our Websites

BOWEN collects information about the way jobseekers and visitors use the website in order to improve the user experience. BOWEN will not use information gained in this manner in a way that any individual can be identified, and will use it to understand users better, and to determine aggregate trends, most popular pages and services engaged for all the website's users. BOWEN may share this kind of aggregate data with selected third parties to assist with these purposes where you have consented to this.

Cookies

A cookie is a small data file which is sent from a web server to a web browser when that browser visits the server's site.

BOWEN obtains information about your general internet usage by using a cookie file which is stored in the hard drive of your computer. Cookies help BOWEN to improve our site and to deliver a better and more personalized service.

They enable BOWEN to:

- Remember your login
- Recognize you when you return to the BOWEN site
- Track web traffic on an aggregate basis
- Track marketing campaigns
- Keep session information such as your last search

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Most browsers allow you to turn off cookies. However, switching off cookies will likely restrict your use of the BOWEN website.

Changes to the BOWEN Privacy Policy

Any changes to this Privacy Policy will be posted on this website so you are always aware of what information that is collected, how it is used, and under what circumstances, if any, that your data may be disclosed.

Who Do I Contact If I Have Questions or Wish to File a Complaint?

BOWEN Workforce Solutions Inc. takes complete responsibility for the management and confidentiality of the personal information it collects.

If you have any questions, comments or concerns about this Privacy Policy or to give any notices pursuant to this Privacy Policy, please contact the Privacy Officer in writing:

Privacy Officer
BOWEN Workforce Solutions Inc.
Suite 700, 602 – 12th Avenue SW, Calgary, Alberta, T2R 1J3
privacy@bowenworks.ca | Phone: 403 262 1156 | Fax 403 537 6952

The Privacy Officer will investigate your complaint and respond within 30 days.

To file a complaint or initiate an inquiry, or to obtain more information about privacy laws in general, you may also contact:

Office of the Information and Privacy Commissioner of Alberta
410, 9925 - 109 Street, Edmonton, AB T5K 2J8
Phone: 780 422 6860 | Toll-free in Alberta: 1 888 878 4044 | Fax: 780 422 5682

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