

Bill C-6 became federal law on January 1, 2001. Bill C-6 applies to all commercial transactions of personal information in the federally regulated private sector and all transfers of personal information across provincial or international boundaries.

Personal information is defined as “information about an identifiable individual,” excluding the name, title, business address or telephone number of an employee of an organization. Bill C-6 is intended to address how we handle our clients’ customer data rather than our own clients. Kirk, in the regular course of business, receives client’s customer data, which is wholly owned and managed by the client. We are accountable to safely handle this information, whether in electronic or paper format.

As long-standing members of the BC Association of Integrated Marketers (BCAIM, formerly the BC Direct Marketing Association), Kirk has kept abreast of industry standards and practices for information gathering and handling. We have policies and procedures in place that align with the expectations of the Canadian Marketing Association (CMA), a pioneer in the area of privacy. The CMA is the industry body that sets the standards of ethics, mainly designed to enhance and maintain consumer confidence in our industry.

Kirk Integrated Marketing Services’ Privacy Policy is a statement of principles and policies regarding the protection of personal information by Kirk. The objective of Kirk’s Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information Protection and Electronic Documents Act. Kirk will continue to review the Privacy Policy to make sure that it is relevant and remains current with changing industry standard, technologies and laws.

The following ten principles are the foundation of the protection of personal information:

1. **Accountability:** Kirk is responsible for personal information under its control and has designated a Privacy Officer responsible for Kirk’s compliance with the following principles.
2. **Identifying Purposes:** Kirk shall identify the purpose for which the personal information is collected.
3. **Consent:** The knowledge and consent of an individual are required for the collection, use and disclosure of personal information, except where exempted in Kirk’s Privacy Policy or by law.
4. **Limiting Collection:** Kirk will limit collection to only that which is necessary for the purposes identified.
5. **Limiting Use, Disclosure and Collection:** Kirk will not use or disclose personal information for purposes other than that for which it was collected, except with the consent of the individual or as required by law.
6. **Accuracy:** Information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is used.
7. **Security Safeguards:** Kirk will protect personal information by security safeguards appropriate to the sensitivity of the information.
8. **Openness:** Kirk will make available to individuals specific information about its policies and practices relating to the management of personal information.
9. **Access to Personal Information:** Upon written request, Kirk will inform an individual of the existence, use and disclosure of and access to his or her personal information and direct them to the owner of the information. An individual can challenge the accuracy of it and have it amended as appropriate.
10. **Challenging Compliance:** An individual can address a challenge concerning compliance to the above principles to the designated individuals accountable for the Kirk’s compliance with the Privacy Policy.

Kirk routinely handles customer information; from receipt of an electronic data file to printing and delivery of materials to postal administrations or other destinations. We treat this information as

confidential and ensure that our staff have access to the information only as it pertains to performing their job functions. The nature and sensitivity of the information is taken into consideration for data handling, storage and disposal requirements. Data is stored in a secure environment, with strict computer access controls.

Kirk management is committed to a high level of physical security and vigorously ensure that all security measures are adhered to. As well, every employee at Kirk Integrated Marketing Services Ltd. signs a strict confidentiality agreement as a condition of employment. Kirk Integrated Marketing Services Ltd. prides ourselves in our reputation and maintaining the confidentiality of our clients and their customer information.

CONTACT INFORMATION

Kirk Integrated Marketing Services Ltd. takes our responsibility to protect the confidentiality of customer information very seriously.

For more information about our commitment to privacy, please contact our Privacy Officer at the following address:

Privacy Officer
Kirk Integrated Marketing Services Ltd.
110-11388 No 5 Road
Richmond, BC V7A 4E7
Phone: 604.279.8484
Facsimile: 604.279.8406
Email: info@kirkmarketing.com

Upon completion of review by Kirk Integrated Marketing Services Ltd., if you are still not satisfied, you may contact the Privacy Commissioner of Canada by writing to:

The Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario K1A 0H2
Phone (toll free): 1.800.282.1376
Facsimile: 613.947.6850