

**Version 3**

# **PRIVACY POLICY**



***Tele-Surveys Plus Inc.***

(updated 2008)



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## ***Tele-Surveys Plus Inc. – Privacy Policy***

### **Introduction**

At Tele-Surveys Plus Inc., respecting privacy has always been important and is the reason why we have implemented the Tele-Surveys Plus Inc. Privacy Policy.

The Tele-Surveys Plus Inc. Privacy Policy is a statement of principles and guidelines regarding our management of personal information. The objective of the privacy policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of applicable privacy laws such as *Canada's Personal Information Protection and Electronic Documents Act (PIPEDA)*.

Tele-Surveys Plus Inc. regularly reviews its Privacy Policy to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

Tele-Surveys Plus Inc. is an accredited Gold Seal member of the Marketing Research & Intelligence Association (MRIA). Its employees are also members of the Marketing Research Association (MRA) and the World Association of Marketing Research Professionals (ESOMAR). The MRIA along with its global counterparts (the MRA and ESOMAR) set standards to which members must adhere and which also protect your privacy.



## Scope and Application

The scope and application of the Tele-Surveys Plus Inc. Privacy Policy are as follows:

- The Tele-Surveys Plus Inc. Privacy Policy applies to personal information collected, used, or disclosed by Tele-Surveys Plus Inc.
- The Tele-Surveys Plus Inc. Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.
- The Tele-Surveys Plus Inc. Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by Tele-Surveys Plus Inc.:
  - as per applicable privacy laws, certain business contact information such as an individual's name, title, business address or telephone number;
  - other information about an individual that is publicly available and is specified by regulation pursuant to applicable law; or
  - as otherwise exempted by The Tele-Surveys Plus Inc. Privacy Policy and/or applicable law
- The Tele-Surveys Plus Inc. Privacy Policy will not typically apply to information regarding organizations that deal with Tele-Surveys Plus Inc. However, such information may be protected by other Tele-Surveys Plus Inc. policies and procedures or through contractual arrangements.
- The application of the Tele-Surveys Plus Inc. Privacy Policy is subject to the requirements and provisions of the *Personal Information Protection and Electronic Documents Act* (Canada), the regulations enacted there under, and other applicable legislation or regulation.



## Definitions

**Collection:** The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**Consent:** Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Tele-Surveys Plus Inc. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**Disclosure:** Making personal information available to a third party that is not an agent of Tele-Surveys Plus Inc.

**Employee:** An employee of or an independent contractor to Tele-Surveys Plus Inc.

**Individual:** A respondent in quantitative or qualitative research, or an employee of Tele-Surveys Plus Inc.

**Personal information:** Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization, and does not include descriptive, factual information about an organization.

**Respondent:** A member of the public who provides personal information to Tele-Surveys Plus Inc. in the course of a survey conducted by Tele-Surveys Plus Inc.

**Third party:** An individual or organization outside of Tele-Surveys Plus Inc.

**Use:** The treatment, handling, and management of personal information by and within Tele-Surveys Plus Inc. or by a third party with the knowledge and approval of Tele-Surveys Plus Inc.



## The Tele-Surveys Plus Inc. Privacy Policy in Detail

### ***Accountability***

Responsibility for compliance with the provisions of the Tele-Surveys Plus Inc. Privacy Policy rests with the Privacy Officer who can be reached at (514) 392-4702, by email at [privacy@tsp.ca](mailto:privacy@tsp.ca) or by mail at:

Tele-Surveys Plus Inc.  
**Attention: Privacy Officer**  
505 René-Lévesque Blvd. West  
Suite 1400  
Montreal, Quebec, Canada  
H2Z 1Y7

Other individuals within Tele-Surveys Plus Inc. may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

Tele-Surveys Plus Inc. will use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

Tele-Surveys Plus Inc. implements policies and procedures to give effect to The Tele-Surveys Plus Inc. Privacy Policy, including:

- implementing procedures to protect personal information and to oversee Tele-Surveys Plus Inc.'s compliance with the Tele-Surveys Plus Inc. Privacy Policy;
- implementing procedures to receive and respond to complaints or inquiries to Tele-Surveys Plus Inc. Privacy Policy;
- developing information materials to explain the Tele-Surveys Plus Inc. Privacy Policy;
- reviewing on an annual basis the effectiveness of the policies and procedures to facilitate compliance with the Tele-Surveys Plus Inc. Privacy Policy and consideration of any revisions as deemed appropriate.

### ***Identifying Purposes for Collection of Personal Information***

Tele-Surveys Plus Inc. collects personal information from the public only for the following purposes:

- to conduct quantitative or qualitative marketing and social research; and
- to meet legal and regulatory requirements



Further reference to “identified purposes” mean the purposes identified in this Principle.

Upon request, persons collecting personal information will explain these identified purposes or refer the individual to a designated person within Tele-Surveys Plus Inc. who can explain the purposes.

When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose will be identified prior to use. Unless otherwise permitted or required by law, the consent of the individual will be acquired before the information will be used or disclosed for the new purpose.

Tele-Surveys Plus Inc. will document the purposes for which personal information is collected prior to the information being collected.

Tele-Surveys Plus Inc. will make reasonable efforts to ensure that individuals are aware of the purposes for which personal information is collected, including any disclosures to third parties.

Tele-Surveys Plus Inc. may provide clients or other third parties with information from any survey in aggregate form only. In aggregate form, it is impossible to identify an individual respondent's personal information.

### ***Obtaining Consent for Collection, Use or Disclosure of Personal Information***

Participation by respondents in survey research is always voluntary. When a respondent agrees to participate in a survey, he/she gives consent to the interview by participating.

A respondent is always free to choose whether or not to participate in a survey, always free to choose not to answer any specific questions and free to discontinue participation at any time.

Generally, any personal information collected in the course of an interview is not disclosed to third parties. However, occasionally, a client sponsoring a research project may want to contact respondents directly. In these cases, Tele-Surveys Plus Inc. always explains the reason for the disclosure to the respondent and obtains express permission from the respondent before making any such disclosure.

In obtaining consent, Tele-Surveys Plus Inc. will use reasonable efforts to ensure that, where non-obvious, an individual is advised of the purposes for which personal information will be used or disclosed. The identified purposes will be stated in a manner that can be reasonably understood by the individual.

Generally, Tele-Surveys Plus Inc. will seek consent to use and disclose personal information at the same time it collects the information. However, Tele-Surveys Plus Inc. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.



In determining the appropriate form of consent, Tele-Surveys Plus Inc. will take into account the sensitivity of the personal information and the reasonable expectations of the individual.

Unless express consent is required, the participation of a respondent in a quantitative or qualitative marketing or social research study may constitute implied consent for Tele-Surveys Plus Inc. to collect, use and disclose personal information for the identified purposes.

### ***Limiting Collection of Personal Information***

In conducting surveys, Tele-Surveys Plus Inc. limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to individuals.

Tele-Surveys Plus Inc. collects personal information about an individual primarily from that individual or a member of that individual's household. Except as permitted by law, Tele-Surveys Plus Inc. will only collect personal information from external sources, such as client organizations, if individuals have consented to such collection.

### ***Limiting Use, Disclosure, and Retention of Personal Information***

Tele-Surveys Plus Inc. may disclose an individual's personal information to:

- a client of Tele-Surveys Plus Inc. where the respondent has consented to such disclosure;
- a third party engaged by Tele-Surveys Plus Inc. to perform functions on its behalf;
- a public authority or agent of a public authority if, in the reasonable judgment of Tele-Surveys Plus Inc., it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
- a third party or parties, where the individual consents to such disclosure; or
- disclosure is required or permitted by law

Only Tele-Surveys Plus Inc.'s employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about respondents.

Tele-Surveys Plus Inc. will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where a respondent may have to be re-contacted for purposes of clarifying responses to a survey, or to seek additional responses, Tele-Surveys Plus Inc.



will retain the personal information for a period of time that is reasonably sufficient to allow for this re-contact.

Tele-Surveys Plus Inc. will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction that apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

### ***Accuracy of Personal Information***

Personal information used by Tele-Surveys Plus Inc. will be sufficiently accurate, complete, and up-to date to minimize the possibility that inappropriate information may be used to make a decision about an individual.

Tele-Surveys Plus Inc. will update personal information about individuals as necessary to fulfill the identified purposes or upon notification by the individual.

### ***Security Safeguards***

Tele-Surveys Plus Inc. will protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction on a best efforts basis, through appropriate security measures, regardless of the format in which it is held.

Tele-Surveys Plus Inc. will protect personal information disclosed to third parties by contractual or other means to safeguard the confidentiality of the information and the purposes for which it is to be used.

All of Tele-Surveys Plus Inc.'s employees with access to personal information will be contractually required to respect the confidentiality of that information.

The nature of the safeguards will vary depending on the sensitivity, amount, distribution and format of the information, and the method of storage. More sensitive information will be safeguarded by a higher level of protection.

The methods of protection will include:

- physical measures, for example, locked filing cabinets and restricted access to offices;
- organizational measures, for example, controlling entry to data centers and limiting access to information on a "need-to-know" basis;
- technological measures, for example, the use of passwords and encryption



### ***Openness Concerning Policies and Procedures***

Tele-Surveys Plus Inc. will make information about its policies and procedures easy to understand, including:

- the title and address of the person or persons accountable for Tele-Surveys Plus Inc.'s compliance with the its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- the means of gaining access to personal information held by Tele-Surveys Plus Inc.;
- a description of the type of personal information held by Tele-Surveys Plus Inc., including a general account of its use; and
- a description of what personal information is made available to third parties

### ***Access to Personal Information***

Upon written request, Tele-Surveys Plus Inc. will afford individuals a reasonable opportunity to review personal information in the custody of Tele-Surveys Plus Inc. Personal information will be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.

In certain situations, Tele-Surveys Plus Inc. may not be able to provide access to all the personal information that it holds about an individual. For example, Tele-Surveys Plus Inc. may not provide access to information if doing so would likely reveal personal information about a third party, such as another individual, or could reasonably be expected to threaten the life or security of another individual. Also, Tele-Surveys Plus Inc. may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, an individual will be required to provide sufficient identification information to permit Tele-Surveys Plus Inc. to account for the existence, use and disclosure of personal information and to authorize such access. Any such information will be used only for this purpose.

Tele-Surveys Plus Inc. will promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted by Tele-Surveys Plus Inc. Where appropriate, Tele-Surveys Plus Inc. will transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Individuals can obtain information or seek access to their personal information by contacting the Tele-Surveys Plus Inc. Privacy Officer.



### ***Challenging Compliance***

Tele-Surveys Plus Inc. will maintain procedures for addressing and responding to all inquiries or complaints from individuals regarding Tele-Surveys Plus Inc.'s handling of personal information.

Tele-Surveys Plus Inc., upon written request, will inform individuals about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with the Tele-Surveys Plus Inc. Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

Tele-Surveys Plus Inc. will investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, Tele-Surveys Plus Inc. will take appropriate measures to resolve the complaint including, if necessary, amending its privacy policies and procedures. An individual will be informed of the outcome of the investigation regarding his or her complaint.

### ***Additional Information***

For more information regarding the Tele-Surveys Plus Inc. Privacy Policy, please contact the Privacy Officer at (514) 392-4702, by email at [privacy@tsp.ca](mailto:privacy@tsp.ca) or by mail at:

Tele-Surveys Plus Inc.  
**Attention: Privacy Officer**  
505 René-Lévesque Blvd. West  
Suite 1400  
Montreal, Quebec H2Z 1Y7

Please visit the Privacy Commissioner of Canada's web site at [www.privcom.gc.ca](http://www.privcom.gc.ca).