

PRIVACY POLICY

The Assistant's Desk Inc.

We recognize the importance of privacy, the sensitivity of personal information, and lawyers' professional obligation to keep confidential all information they receive within a lawyer-client relationship. We are committed to protecting personal information we receive. This Privacy Policy outlines how we manage personal information and safeguard privacy.

Privacy Rights. All businesses engaged in commercial activities must comply with the *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to lawyers and law firms, as presented in the document, **PIPEDA and Your Practice: A Privacy Handbook for Lawyers**. We adhere to the guidelines in this handbook.

Why Do We Need Personal Information? We provide legal support services to a wide range of lawyers; and we collect personal information required for the provision of these services. We use personal information for the following purposes:

- (a) to set up, administer and deliver the products and services you have arranged to purchase from us;
- (b) To provide you with ongoing service;
- (c) To meet legal and regulatory requirements;
- (d) To develop products, programs and services that may better meet your needs; and
- (e) To follow-up or introduce you to related products and services that may better serve you or may be of interest to you.

Consent. We comply with **Canada's Anti-Spam Legislation**. Your delivery of an email address to us constitutes implied consent to electronic communication. If you wish to deny or withdraw this consent, then please send your request by email to account@assistantsdesk.com. Sometimes information (e.g., birth date, spousal status, spelling) for data entry is missing. We do not contact your client unless you authorize us to do so.

What personal information do we collect? Personal information is any information that identifies someone or by which a person's identity could be deduced. If we did not collect and use personal information, we could not provide our services.

How do we collect personal information? We collect personal information only from you or your client, at the start of our retainer and when providing our services. Sometimes we obtain personal information from documents you share with us; e.g., information form, insurance binder, agreement of purchase and sale, and mortgage statement.

Disclosure of Personal Information. Under certain circumstances, we will disclose personal information: 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 services we are providing to you requires us to give the information to third parties 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 or technical services to us and the third party is bound by our privacy policy; and if the information is Publicly Available Personal Information, as it is defined under PIPEDA.

Disclosure of Personal Information Across Borders. We are a third-party contractor that provides legal support services (e.g., data collection, data entry and file processing) to improve the efficiency and economy of your law firm. Although we are a Canadian company, we use support staff that is in India. Notwithstanding this, you remain responsible for the personal information that may be shared with us. To ensure this accountability, we have policies and processes in place, including training for our staff and effective security measures, to ensure that the personal information in our care is properly safeguarded always. We also grant you the right to audit and inspect how we handle and store personal information; and you may exercise the right to audit and inspect when warranted. Notwithstanding these precautions, the complexity of the electronic world makes it impossible for us to know precisely where information is flowing while in transit. In addition, we cannot override the laws of India through contract or any other means. We are satisfied, however, that the political, economic and social conditions of India are conducive to our ability to comply with our privacy policies and processes.

How Secure is the Personal Information? We take all reasonable precautions to ensure that the personal information we hold is kept safe from premature loss, unauthorized access, modification or disclosure. Among the steps taken to protect personal information are: premises security, restricted file access,

technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access, and internal password and security policies.

Access to Personal Information. You may require that we disclose or destroy from our records any personal information we hold about your client at any time; and you may retrieve personal information we hold about your client at any time. We do not use Social Insurance Number as a way of identifying or organizing the information we hold.

Communicating with Us. You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

Changes to this Privacy Policy. Since we regularly review our policies and procedures, we may change our Privacy Policy from time to time.

Requests for Access. If you have any questions, please write to our Privacy Contact at: The Assistant's Desk Inc., 95 Queen Street South, Unit B, Mississauga, Ontario, L5M 1K7. If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at: 112 Kent Street, Ottawa Ontario, K1A 1H3 Tel. 1.800.282.1376.

Employment Inquiries. If you apply to us 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 may contain 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 to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.