

Privacy Policy

Bay Area Investigations & Protection Services Ltd. has been providing investigation services to individuals, corporations and the insurance and risk management industry since 1982. We are committed to the highest ethical standards both as to the accuracy and careful treatment of personal information that comes into our possession as part of the services we render to our clients. Bay Area Investigations gathers personal information only in connection with retainers received from clients and our staff have been trained to treat personal information carefully and with respect.

Why Bay Area Investigations Collects and Discloses Personal Information

Bay Area Investigations collects and discloses personal information to enable our instructing principals to satisfy themselves with respect to issues relevant to their personal or corporate needs. It also includes collecting and disclosing personal information about third parties with respect to claims made against these clients.

The Kinds of Personal Information Bay Area Investigations Collects

The type of information Bay Area Investigations collects depends upon the type and nature of the investigation required. This may include, and is not limited to, previous claims history, financial, medical health or employment information. We may seek validation information from retailers, wholesalers and suppliers of goods and services. In appropriate cases we may also seek information from authorities such as the Ministry of the Environment, Ministry of Labour, Office of the Fire Marshal, Police and Fire Services, Municipalities, Towns and Cities.

How Bay Area Investigations Obtains Personal Information

In most cases, personal information is collected directly from the client or their agents or a third party making a claim against our principal.

Personal information may also be collected from involved parties such as public officials (Fire Department, Police, Office of the Fire Marshal) witnesses, other private investigators, credit bureaus, title searchers and the like. The organizations with which we deal are subject to their own privacy codes and we respect those codes.

In some cases, Bay Area Investigations, or those we entrust with specific services, will infer such consent where appropriate. If an instructing principal tells Bay Area Investigations that they have consent to collect information, we will rely on that instructing principal's advice. Consent may not be obtained with respect to the collection of certain publicly available information. If information is collected with respect to an investigation involving a suspected breach of contract (or other agreement) or breach of Canadian law, then consent may not be obtained.

Bay Area Investigations' Disclosure of Personal Information

Bay Area Investigations discloses personal information, including to its affiliated companies, only for the reasons listed above or if required to do so by law. The majority of information is disclosed or transferred solely to our instructing principals. However, in order to collect the information required by our principals, we may disclose personal

information to third party service providers. This would include (and is not limited to) insurer's, insurance brokers, insurance adjusters, automobile repair companies, contractors, construction companies, investigators, engineers, accountants, lawyers, and others. We may also disclose personal information to authorities with jurisdiction such as Fire Departments, Fire Marshals, Police and other Federal, Provincial or Municipal authorities for the purposes of verifying the circumstances surrounding a breach of agreement or a breach of a law. We obtain consent to disclosure when required. Consent may also be inferred where appropriate. If an instructing principal advises us that they have their client's consent to disclose information, we will rely on our instructing principals advice.

Where Bay Area Investigations discloses personal information to an approved investigative body (such as the Insurance Crime Prevention Bureau) or when we believe that the information relates to the breach of contract or other agreement or Canadian law, or where we are required by law to disclose the information, consent may not be obtained. Similarly, if personal information is disclosed to a lawyer for claims purposes or to obtain legal advice, consent may not be obtained.

How Bay Area Investigations Ensures the Security of Personal Information

Personal information recorded in documents is securely stored at Bay Area Investigations' offices and its employee's offices in Canada and at offices of Bay Area Investigations affiliated companies. Electronically recorded information is stored on computer systems maintained by Bay Area Investigations and affiliated companies. These computer systems and the information stored in them are protected by electronic security systems.

Bay Area Investigations and its affiliated companies restrict access to personal information and our employees, contractors and representatives are under obligation to access personal information only when they have a legitimate business need to do so. Bay Area Investigations employees receive training with respect to proper personal information handling practices and they are under obligation to comply with the privacy laws, this policy and related codes of conduct.

Bay Area Investigations compliance with appropriate personal information practices and privacy laws is overseen by and is the responsibility of our Privacy Officer.

Accuracy and Access to Personal Information

Bay Area Investigations is committed to the accuracy and completeness of the personal information it uses or discloses to its instructing principals.

Upon written request and subject to the following (and any other reasonable conditions which may be necessary) we will provide reasonable access to personal information exclusively to the individual to whom it refers. We will not provide access in any of the following circumstances:

- If doing so would likely reveal personal information about a third party;
- If the information is subject to solicitor-client privilege;
- If revealing the information would reveal confidential commercial information;

- If revealing the information could affect the security of another person;
- If the information relates to the actual or suspected breach of an insurance policy or other agreement or the breach of a Canadian law, or;
- If the information was generated in the course of a formal dispute resolution process;
- Where Bay Area Investigations is acting as agent another instructing principal where that principal has the responsibility to respond to access to personal information.

Amendments

Bay Area Investigations may amend this policy from time to time at its discretion. A current version of this privacy policy is available on Bay Area Investigations main web site at <http://www.investigationsontario.com> .

Further Information

Request for further information, personal information access, or complaints about Bay Area Investigations handling of personal information should be referred to Bay Area Investigations Privacy Officer as follows:

Bay Area Investigations
4390 Paletta Court, Unit K
Burlington, ON L7L 5R2
Attention: Carri Kram
Telephone No.: 877-807-1944