

PRIVACY POLICY

0.0 Supporting Documents

AICPA Privacy Management Framework

1.0 Overview

As business objectives require, Page One may collect personal information about employees and clients for various purposes. Page One shall identify the purposes for which personal information is collected at or before the time the information is collected.

Page One may also collect personal information from other sources including previous employers, work associates, personal references or other third parties to whom the Staff member has given permission to disclose the information.

2.0 Purpose

Page One has a responsibility to inform employees and clients of the policies and practices for the management of personal information and will make these policies and practices understandable and easily available.

3.0 Scope

Consent requirements may vary depending upon circumstances and upon the type of personal information that Page One intends to collect, use, or disclose. When determining whether consent is required, Page One will take into account both the sensitivity of the personal information and the purposes for which Page One will use the information. If consent is required, Page One will determine the form of consent that is appropriate. Consent may be expressed, implied, or deemed and may be obtained in person, by phone, by fax, by mail, e-mail, or via the Internet. Subject to our legal rights and obligations, Page One may, from time to time, seek a Staff member or client's consent to collect, use or disclose personal information for a new purpose.

4.0 Policy

The collection of personal information will be limited to the amount and type of information required specifically for an identified purpose. Page One shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the employee/client or if the use or disclosure is authorized by law.

Personal information collected in one business unit of Page One may be shared with other business units of Page One for the purposes as identified above. Page One may disclose personal information about its Staff for human resources and benefits administration and in the context of providing references regarding current or former employees in response to requests from prospective employers.

Page One may compile and disclose certain information about Staff to a limited number of third parties and those we are obliged to do so by law in order to administer staffing,

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compensation, and benefits programs. Although Page One will protect and limit the use of personal information about Staff or clients that is disclosed to third parties, Page One is not responsible for the subsequent uses or disclosure of the subject personal information by the third-party recipient such as government agencies.

Page One takes appropriate steps to ensure that personal information is accurate, complete, and up-to-date to minimize the possibility that inaccurate personal information is being utilized.

Page One will provide adequate safeguard practices to ensure the security of personal information, protect the information against loss or theft and safeguard the information from unauthorized access, disclosure, copying, use or modification.

Only Page One Staff with a business need to know, or whose duties reasonably so require, are granted access to personal information about Page One Staff or clients.

Personal information is kept as long as necessary to satisfy the purposes.

Files containing personal information are business records and, as such, property of Page One. Subject to Page One's legal rights and obligations, Page One shall, upon receipt of a written request, inform the Staff member of the existence, use and disclosure of his or her personal information and shall, subject to reasonable limitations, permit the individual access to that information. Page One will respond to a request to access personal information within a reasonable time.

Personal information contained in business records may not be edited or removed except as follows:

- When a Staff member can demonstrate that the personal information is not accurate or complete, the information will be annotated or amended as appropriate.
- When the information is (i) personal information about a third party, (ii) sensitive or confidential business information of Page One or a third party or (iii) any other information that Page One is required or permitted by law to remove.

Staff members can seek access to their personal information by sending a written request to the Human Resources Department.

5.0 Enforcement

Any Staff found to have violated this policy may be subject to disciplinary action, up to and including termination.

6.0 Distribution

This policy is to be distributed to all Page One Staff.