



# Privacy Policy

## Purpose

This document defines the privacy and confidentiality policy of Mixto Ltd., and takes the privacy and confidentiality of our employees and clients very seriously. To ensure that we are protecting our corporate and client privacy and confidentiality from breaches, this policy must be followed and will be enforced to the fullest extent.

The Personal Information and Electronic Documents Act (PIPEDA) regulates all organizations that collect, use or disclose personal information. In essence, this federal act (along with "substantially similar" legislation in some provinces) stipulates that no collection, use or disclosure of personal information be done without consent.

## Scope

Mixto is responsible for the personal information in our possession or custody, including personal information that has been transferred to, or received from, a customer or third party in the course of commercial activities for processing or other purposes for which they have consented. Mixto is responsible for ensuring that the information we receive is secured and protected, correctly utilized, and disposed of properly.

## Audience

This policy applies to all employees, management, contractors, vendors, business partners, clients and any other parties who have access to company data.

## Consent

Mixto does not collect and utilize personal information for its own purposes. We are a third party service provider that will utilize personal information provided to us by a customer for the sole purpose of producing and mailing specific documents such as kits, contracts or direct marketing pieces; and various other electronic communications, printed or otherwise.

It is the customer's sole responsibility to ensure that the personal information provided is accurate and that they have appropriate consent to use it. By supplying this information to Mixto, the customer authorizes that we use it to accomplish a specific mandate on their behalf but they will maintain full liability regarding the accuracy of information provided and individual consent.



## Adherence to Policy

- 1. Identifying purposes**

The purpose for which the information will be used will be clearly identified before it arrives. Specific protocols are defined for transmission and handling of this information and communicated to all relevant internal and external parties. Specific project identification and individual access codes are assigned.
- 2. Limiting collection**

When a customer requires that Mixto collect third-party personal data on their behalf, it will be the customer's responsibility to ensure that the information collected is limited to what is necessary for the specific purposes identified for each project.
- 3. Limited use, disclosure and retention**

Personal information will not be used or disclosed for purposes other than those for which it was received. It will be retained only as long as necessary for the fulfillment of those purposes, unless special arrangements have been agreed upon or as required by law.
- 4. Confidentiality**

Privacy legislation and our policy prohibit unauthorized persons from viewing, copying, forwarding, altering or destroying information or data without explicit authorization. All employees must sign confidentiality agreements and contractors must sign a non-disclosure agreement along with proof of compliance to the PIPEDA. Information classification guidelines have been given to all personnel. Specific processes and procedures have been established and proper training is supplied to support this policy. All personal information is protected by security safeguards appropriate to the sensitivity of the information.
- 5. Data/file transfers**

Data transfers between Mixto and its customers can be done using one or more of the following methods: FTP and SFTP. Specific protocols have been established for each and must be strictly applied.
- 6. Access**

Information access is controlled in a number of ways including hardware, software, password protection and restricted physical access. Only those employees directly involved are granted access to customer data. Information storage facilities, computing installations and supporting facilities are controlled with restricted physical access.
- 7. Data protection**

All personal information is stored on servers within restricted physical access areas. Only authorized personnel from IT can install hardware and software. Data to be transferred is encrypted and password protected. Once information has been used, it is destroyed according to a special protocol. Obsolete computer equipment and software are destroyed on site, regardless of data content, by a specialized team using a specific protocol.
- 8. Reporting incidents**

Every employee and contractor has specific responsibilities with regard to the information they have access to or utilize. Should an incident occur, they are obliged to report it to



their immediate superior and to the Information Security and Privacy Officer so that the situation is properly controlled and corrective measures can be taken if required.

**9. Information accuracy**

Mixto takes appropriate measures to produce documents with accurate personal information.

## **Responsibilities**

All employees are responsible for adhering to the policy and reporting any activities that do not comply with this policy.

Management is responsible for ensuring that their direct reports understand the scope and implications of this policy.

## **Management**

Ownership of this policy falls to Mixto's Security Officer, Eva Barnes. For any questions about this policy, or to report a breach in privacy or confidentiality, please contact her at:

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