

 ROADTREK		PIPEDA Policy HR-11-07	
Original Issued Date: January 2024	Current Version Date: January 2024	Version Code: A	
Originating Department: Human Resources	Prepared by: T. Grant Title: HR & HS Manager	Approved by: M. Miletto Petrazzini Title: CEO	

1. Introduction:

1.1 This PIPEDA (Personal Information Protection and Electronic Documents Act) policy outlines the principles and practices followed by Roadtrek Inc. by PIPEDA regulations applicable in Ontario, Canada. It demonstrates our commitment to protecting the privacy and confidentiality of personal information collected, used, and disclosed during our operations.

2. Scope:

2.1. This policy applies to all employees, contractors, and any other individuals or organizations working on behalf of Roadtrek Inc. who handle personal information.

3. Definition

3.1. "Personal Information" refers to any information about an identifiable individual as defined by PIPEDA. This includes information in any form, such as:

- Age, Name, ID numbers, income, ethnic origin, or blood type.
- Opinions evaluations, comments, social status, or disciplinary actions; and
- Employee files, credit records, loan records, medical records, the existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services or change jobs)

3.2. "Consent" means the voluntary agreement given by an individual regarding the collection, use, and disclosure of their personal information.

4. Principles of Privacy:

4.1. Accountability: Roadtrek is responsible for the protection of personal information under its control and designates a Privacy officer to oversee compliance with PIPEDA.

4.2 Identifying purposes: We will only collect personal information for specified and legitimate purposes, clearly identifying these purposes before or at the time of collection.

4.3 Consent: We will obtain informed consent from individuals before collecting, using, or disclosing their information, except where permitted or required by law.

4.4. Limiting collection: We will collect personal information only by fair and lawful means, limited to what is necessary for the identified purposes.

4.5. Limiting Use, Disclosure, and Retention: Personal information will not be used, disclosed, or retained for purposes other than those for which it was collected, unless consent is obtained or as required by law. Information will be retained, only as long as necessary to fulfill the identified purposes.

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4.6. Accuracy: We will make reasonable efforts to ensure the accuracy and completeness of personal information.

4.7. Safeguards: We will implement appropriate security measures to protect personal information against unauthorized access, disclosure, copying, use, or modification

4.8. Openness: We will maintain transparency by informing individuals about our privacy policies and practices.

4.9. Individual Access: Upon request, individuals will be granted access to their personal information held by Roadtrek Inc. and we will have the ability to request corrections or updates if necessary.

4.10. Challenging compliance: We will provide a mechanism for individuals to address complaints or inquiries regarding our complaint with PIPEDA and take appropriate actions to resolve any disputes.

5. Training and Review:

5.1. Roadtrek will provide training and resources to employees and contractors involved in handling personal information to ensure their understanding and adherence to this policy.

5.2. We will regularly review and update this PIPEDA policy to reflect changes in legislation, regulations, technology, and best practices.

6. Conclusion:

6.1. This PIPEDA policy serves as a commitment by Roadtrek Inc. to protect personal information in compliance with PIPEDA regulations.

REVISION & APPROVAL HISTORY:

Rev.	Description of Change	Change By	Approved By	Issue Date
A	Original Issue		M. Miletto Petrazzini 	January 2024