

# WINTERGREEN

LEARNING MATERIALS

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June 15, 2021

Skills Compétence Canada Ontario  
7A-60 Northland Road  
Waterloo, ON  
N2V 2B8

Re: Privacy

To whom it may concern,

At Wintergreen Learning Materials Ltd. we are committed to the protection of privacy of our customers, staff and partners and as such we do not share information with third parties outside of our company. In addition, every employee is subject to our company privacy policy, which I have included on for your reference.

When Skills Ontario provides Wintergreen Learning Materials Ltd. with customer contact and shipping information, our customer service team enters that data into our ERP system. While it is retained there, that information is never used for additional outside purposes other than to fulfill the specific order request made by Skills Ontario.

If any further information or action is required, I would be happy to provide it for Skills Ontario. I look forward to our continued partnership.

Sincerely,



Michael Hayward  
President & CEO

## CONFIDENTIAL

### WINTERGREEN LEARNING MATERIALS LTD. COMPANY PRIVACY POLICY

#### PRIVACY POLICY

WLM is dedicated to maintaining the highest standards of confidentiality with respect to all employees' personal information provided to us. We are committed to ensuring that our handling of personal information is in compliance with applicable privacy legislation.

**What Is Personal Information?** Canadian privacy legislation defines "Personal Information" broadly as information about an identifiable individual or as information that allows an individual to be identified. Personal Information includes information such as address, gender, age, ID numbers, income, ethnic origin, employee files, credit records or medical records. Generally speaking Personal Information does not include what is considered business contact information: your name, title or position, business address, business telephone or facsimile number, or business email address.

**Objectives of the Privacy Policy:** WLM is responsible for Personal Information it holds or has under its control, including Personal Information it passes on to others with your permission. We have designated a Privacy Officer to ensure our compliance with legislation and this policy. Our Privacy Officer will receive and respond to your inquiries and complaints regarding the protection and privacy of your Personal Information, and deal with requests for access to your information.

Our Privacy Officer is: **Accounting Manager**

**Purposes for the Collection of Personal Information:** The purpose for which Personal Information is collected by WLM is, in part, specified below:

- to enrol the employee on the payroll system
- to comply with requirements imposed by law
- to comply with statutory obligations including tax withholdings and remittances for Canada Pension Plan and Employment Insurance

Any change of purpose to any of the above will be communicated to you. Where appropriate, Personal Information will be obtained directly from you. In the event Personal Information is obtained from any other source, you will be notified or your authorization will be obtained.

**Consent to Collection, Use and Disclosure of Personal Information:** BY SUBMITTING PERSONAL INFORMATION TO WLM OR ITS SERVICE PROVIDERS AND AGENTS, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY, BUSINESS INTERESTS AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Privacy Officer. If you refuse to consent or withdraw your consent, we may not be able to provide you or continue to provide you with certain employment benefits.

There are circumstances where collection, use or disclosure may be justified or permitted, or where we are obliged to disclose Personal Information without your consent. These circumstances could include, but are not limited to:

- Where the information is publicly available
- Where we are required to do so by law or by order of a court or tribunal
- Where we believe, upon reasonable grounds, that there is an imminent risk to an identifiable person or group of death or serious bodily harm
- Where it is alleged that an employee, officer, agent or director of WLM is guilty of a criminal offence, or is civilly liable in a legal action or guilty of certain misconduct

In such circumstances, we will not collect, use or disclose more Personal Information than is required.

Attached as Appendix A is the form of consent you will be requested to execute where applicable.

**Third Parties:** Third parties that receive Personal Information will be required to confirm their commitment to the privacy policies set out herein.

**Storage, Security and Protection of Personal Information:** WLM endeavours to maintain appropriate physical, procedural and technical security over our offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use or modification of Personal Information. Your Personal Information may be stored in secured physical locations and on computer network servers controlled by WLM, located either at our offices or at the offices of our service providers. To help protect the confidentiality of your Personal Information, WLM employs physical, administrative and technological safeguards appropriate to the sensitivity of your Personal Information. For instance, we use secure computer data networks protected by industry standard firewalls and password protection systems. In addition, where Personal Information is sent to a third party for processing, we make sure, through our arrangements with them, that all Personal Information is kept secure.

**Retention of Personal Information:** We will keep Personal Information only as long as it is necessary. When the Personal Information is no longer required, it will be destroyed to prevent unauthorized parties from gaining access to the information.

**Access and Accuracy:** Upon receiving a written request, and subject to any applicable exemptions, WLM will inform you of the current version of your Personal Information and will give you access to that information and the opportunity to correct any errors in it. Access requests should be sent to our Privacy Officer, using the contact information provided above.

**Changes to the Privacy Policy:** WLM reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes and, if requested, provide a physical copy to you.