

TalentSphere Staffing Solutions Inc.

Personal Information Protection Policy

TalentSphere Staffing Solutions Inc. (“TalentSphere”) is committed to safeguarding the personal information entrusted to us by our employees, employers/clients, job seekers and suppliers. We manage your personal information in accordance with *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to TalentSphere and to any person providing services on our behalf. A copy of this policy is provided on request.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual’s name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our clients and candidates. This may include:

- Contact details, your resume, a description of the type of work you are looking for, and career preferences.
- Our interview and screening notes.
- Information obtained through reference and background checks.
- Education records and accreditation records.
- Reference letters.
- Skill testing results.

How we use your personal information:

TalentSphere uses your personal information to:

- Understand your qualifications, needs and preferences.
- Find the best job opportunities for you that will give you the job satisfaction you are looking for.
- Fulfil our clients' requests for information about job candidates.
- Provide you with appropriate training or career transition services.
- Assess and develop our business and operations to better service job seekers and our clients.
- Provide payroll and other HR functions to you, for temporary staffing arrangements.

For temporary and interim job seekers: What is personal employee information?

Personal employee information is personal information about an employee which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

We can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment relationship. We will provide current employees with prior notice about what information we collect, use or disclose and our purpose for doing so.

What personal employee information do we collect, use and disclose?

We collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if they arise

- Administering pay and benefits (paid employees only)
- Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims) (paid employees only)
- Complying with requirements of funding bodies (e.g. lottery grants)
- Complying with applicable laws (e.g. *Canada Income Tax Act*, Ontario Employment Standards Act)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes.

- Contact information such as your name, home address, telephone number
- Criminal background checks
- Employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc. (paid employees only)
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
- Other personal information required for the purposes of our employment relationship

We will inform our employees of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

Consent

We normally collect personal information directly from our clients and job seekers. We may collect your information from other persons with your consent or as authorized by law.

We inform you before or at the time of collecting personal information, of the purposes for which we are collecting the information.

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

What information do we provide for employment references?

In some cases, after your employment relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment
- General information about an individual's job duties and information about the employee's ability to perform job duties and success in the employment relationship

How do we safeguard personal information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of TalentSphere Staffing Solutions Inc., subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to **Privacy Officer, privacy@talentsphere.ca, or mail: 19-13085 Yonge Street, Suite 302, Richmond Hill, ON, L4E 0K2**. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by TalentSphere Staffing Solutions Inc., or about a request for access to your own personal information, please contact **Privacy Officer, privacy@talentsphere.ca, or mail: 19-13085 Yonge Street, Suite 302, Richmond Hill, ON, L4E 0K2**.