



## PRIVACY POLICY

At Bradbury Brand + Design Experts we understand that trust is earned. As a company we are committed to protecting all personal, confidential and third party information. Each employee and representative of Bradbury has been instructed on and agreed to abide by this privacy policy in the handling of your information.

The *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) regulates the way private sector organizations within Saskatchewan collect, use, keep, secure and disclose personal information. According to this Act, organizations like Bradbury Brand + Design Experts:

*“must obtain an individual's consent when they collect, use or disclose that individual's personal information. People have the right to access their personal information held by an organization. They also have the right to challenge its accuracy. Personal information can only be used for the purposes for which it was collected. If an organization is going to use it for another purpose, they must obtain consent again. Individuals should also be assured that their information will be protected by appropriate safeguards.”*

([https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/pipeda\\_brief/](https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/pipeda_brief/))

### **Personal Information**

“Personal Information” is defined in PIPEDA to mean all information about an identifiable individual. Personal information does not include the name, title, business address, or telephone number of an employee of an organization.

### **Accountability**

Bradbury Brand + Design Experts is committed to securing your privacy. Employees and representatives of Bradbury are responsible for the personal information under their control. We have appointed a Privacy Officer who is responsible for analyzing all personal information handling practices and ensuring that our privacy policy is up-to-date and in force.

Effective Date of Policy: January 1, 2019

Revised: August 28, 2020

## **Why We Collect Information**

We need certain personal information to establish a relationship and serve you. We will obtain information directly from you or, when applicable, from your employer.

When we collect information about you we will limit the information we collect to what we need for specific purposes. Your personal information may be used:

- To provide a brand strategy, design, marketing, communications, customer experience management, social media, or advertising service;
- For Bradbury's internal purposes such as data analysis and research to improve our services and communications;
- To contact you, with consent, regarding new services and offers available from Bradbury, including upcoming events or other relevant notifications;
- To invite you to provide your opinion or feedback on various topics from time to time so Bradbury can constantly improve our customer experience and services. Participation in these types of initiatives is voluntary and confidential.

## **Consent**

We typically obtain a client's consent to collect, use and disclose their personal information. Consent may be expressed (i.e. we ask for your specific consent either verbally or in writing) or implied by the fact that the client has engaged us to provide services and the collection, use and disclosure of personal information relates to the performance of those services. If you choose to engage in Bradbury's services and provide your personal information to us, we accept that you consent to the collection, use and disclosure of your personal information as outlined in this policy.

The choice to provide us with personal information is always yours. Upon request, we will explain your options of refusing or withdrawing consent to the collection, use and release of your information, and we will record and respect your written choices. However, your decision to withhold particular details may limit the service we are able to offer. Refusal or withdrawal of consent is subject to any overriding legal requirements or commitments.

PIPEDA also permits us to collect, use or disclose personal information in some circumstances without the individual's consent, including (but not limited to) the following:

- where the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- where the personal information is available to the public from a prescribed source;
- where the personal information is necessary to collect a debt you owe to us.

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## **Limiting Collection**

Bradbury Brand + Design Experts collects information only for a specific, limited requirement using fair and lawful means. We will not collect any information that does not pertain directly to services engaged in with you.

## **Website**

When you visit our website, information is not collected that could identify you personally unless you choose to provide it. You are welcome to browse the website at any time anonymously and privately, without revealing any personal information about yourself.

Some of the services on our websites allow you to send us an email. We will use the information you provide, such as your name, email address or phone number, only to respond to your inquiry. Keep in mind that email transmissions are not encrypted by default, so we suggest you do not send sensitive information such as Social Security numbers, credit card numbers, or bank account information via such contact forms.

Our websites, [www.bradburybrandexperts.com](http://www.bradburybrandexperts.com) and [www.quencreative.ca](http://www.quencreative.ca), use cookies to provide a customized user experience on the site. A cookie is a small file that a website transfers to your computer to allow your browser to remember information about your last visit to our website. The information these cookies collect includes:

- The domain you access our website from
- Your computer's IP address
- The date and time you accessed the site
- The operating system of your computer
- The browser you're using to access our site
- The Universal Resource Locators (URLs) of the pages you visit on our website
- The URL of site you came from, if you clicked a link there that brought you to our website

Our websites also use third-party analytics services (like Google Analytics) to gather this information for analysis.

## **Limiting Use, Disclosure and Retention**

Personal information is used only for the purposes defined as we seek to fulfill our obligations. We will seek your consent before using the information for purposes beyond the scope of your original consent.

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Under no circumstances do we sell customer lists or other personal information to third parties. We will retain your information only for the time it is required for the purpose it was intended. Once your personal information is no longer required, it will be destroyed or made anonymous.

### **Accuracy**

We will make reasonable efforts to keep your information accurate and up-to-date. We encourage you to review and confirm the accuracy of information you have provided. If you find any errors, we urge you to provide us with the updated information so that the appropriate corrections can be made.

### **Safeguards: Protecting Your Information**

We will protect your information with appropriate safeguards and security measures. Bradbury Brand + Design Experts has implemented reasonable physical, organizational and technological security measures to safeguard the personal information in our custody or control to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These safeguards include: security of our physical office premises, security software and firewalls to prevent unauthorized computer access and internal passwords that restrict access to our electronic files. We audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

Access to personal information is granted only to Bradbury Brand + Design Experts employees, representatives and service providers in order to perform their duties, and only as authorized by the individual through the consent process, and to those otherwise authorized by law.

When we provide information to service providers acting on our behalf, such organizations or individuals are required to abide by our Privacy Policy. We will give them only the information necessary to perform the services they are engaged to perform. We will require that they not store, analyze or use that information for purposes other than to carry out those services.

### **Openness: Keeping You Informed**

This plain-language Privacy Policy is made available to the public in paper form from our office and in electronic form on our website. If you have any questions or concerns about privacy, we invite you to contact us.

### **Providing Individual Access**

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We promise to provide you access to the information we retain about you within a reasonable time once we have received a written request, satisfactory identification, and reviewed the application for access.

You have the right to know:

- How we collected your personal information;
- How we are using it; and
- To whom it may have been disclosed, except where such disclosure was to a governmental body or service provider for routine purposes (i.e. auditors or accountants.)

If you find any errors in this information, we urge you to provide us with the updated information so that the appropriate corrections can be made.

Under certain circumstances Bradbury Brand + Design Experts may decline to provide access to personal information within our possession or control if:

- Providing access would be likely to reveal personal information about a third party or could pose a threat to the security of the third party, and the information cannot be segregated;
- Disclosure would reveal confidential commercial information about our company;
- It would be too costly, in our determination, to retrieve it.

If we deny your individual request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

### **Challenging Compliance**

We encourage you to contact us with any questions or concerns you might have about your privacy and our Privacy Policy. In most cases, an issue may be resolved simply by discussing it.

If you feel that your concerns have not been addressed satisfactorily, please contact Bradbury Brand + Design Experts' Privacy Officer:

**Bill Schwarz**  
**VP Business Development**  
**Bradbury Brand + Design Experts**  
**3056-737-6049**

If the issue is still not resolved to your satisfaction, we will provide information on other complaint procedures that may be available to you through the Office of the Saskatchewan Information and Privacy Commissioner.

**Saskatchewan Information and Privacy Commissioner**  
**503 – 1801 Hamilton Street**  
**Regina SK S4P 4B4**

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**Telephone: 306-787-8350**

**Toll Free Telephone (within Saskatchewan): 1-877-748-2298**

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