

# PRIVACY STATEMENT

## WHY DO WE HAVE A PRIVACY POLICY?

At CreekWest Custom Homes, we take the issue of safeguarding privacy very seriously. CreekWest is committed to protecting the confidentiality and security of Personal Information entrusted to it and ensuring that all Personal Information CreekWest Homes holds is collected, used and disclosed in compliance with all applicable federal and provincial privacy legislation ("Privacy Legislation"), including the Personal Information Protection Act (Alberta) ("PIPA"). All Personal Information obtained from any individual is handled with the strictest confidentiality.

## DEFINITION

Within this Privacy Policy, "Personal Information" means information about an identifiable individual. Personal Information does not include publicly available information such as business contact information which includes an individual's name, position name or title, business telephone number, business address, business e-mail, and other similar business information; information that has been made anonymous, or aggregated information that cannot be associated with a specific individual.

## SCOPE

This Privacy Policy applies to CreekWest Custom Homes, its employees and potential or existing clients or customers (the "Clients"). In addition, contractors, consultants, agents, auditors, franchisees and other third party service providers are bound to comply with this Privacy Policy and CreekWest Homes' practices governing the protection of Personal Information and privacy.

## COLLECTING PERSONAL INFORMATION

CreekWest Custom Homes will document the purposes for which Personal Information is collected and will only collect Personal Information for the identified purposes. Upon request, persons collecting Personal Information will explain the purposes or refer the individual to the Sales Manager and or/ Legal Representative of CreekWest Custom Homes who will explain the purposes.

In accordance with Privacy Legislation, CreekWest Custom Homes will identify and document any new purposes for which previously collected Personal Information may need to be used and disclosed, and obtain the consent of the individual where applicable.

CreekWest Custom Homes may collect the following Personal Information when necessary:

- Your contact and mailing information such as name, address, telephone numbers, fax numbers email addresses and cheques (including bank account information)



- Employment information, credit information, and personal references of those who are applying for credit
- The plans, specifications and other particulars about the home which is being built for you
- Insurance information
- Municipal and legal descriptions for your home
- Any other relevant information necessary to provide you with our products and services
- We may need to collect other Personal Information depending on the circumstances, but we will ask you directly and ensure that you agree.

CreekWest Custom Homes will collect, use and disclose Personal Information in accordance with Privacy Legislation and will limit the amount and type of Personal Information collected to that which is necessary to fulfill identified purposes.

#### CONSENT

CreekWest Custom Homes will seek consent, where required, to collect, use and disclose Personal Information when it collects Personal Information or in accordance with Privacy Legislation. In obtaining consent, CreekWest Custom Homes will ensure that an individual is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood. In determining the appropriate form of consent, CreekWest Homes will take into account the sensitivity of the Personal Information, the reasonable expectations of the individuals involved, and the requirements of Privacy Legislation.

An individual may withdraw his or her consent to the collection, use and disclosure of Personal Information in accordance with this Privacy Policy at any time upon reasonable notice to CreekWest Custom Homes in writing, subject to legal or contractual restrictions. The withdrawal of the Client's consent may affect CreekWest Homes' ability to continue to provide an individual with the products and services that the individual has or would like to receive.

#### DISCLOSURE OF INFORMATION

CreekWest Homes will comply with Privacy Legislation when disclosing Personal Information and will obtain consent for disclosure of Personal Information if required by Privacy Legislation.

CreekWest Homes will maintain a record of the third parties that Personal Information is disclosed to in accordance with this Privacy Policy.

#### SAFEGUARDING YOUR PERSONAL INFORMATION

Like you, we at CreekWest value your Personal Information. Part of valuing your Personal Information is making sure that it is protected and kept confidential. We achieve this by:



- Having our employees and trades sign a confidentiality agreement
- Keeping our records in a secure central area
- Having up to date computer security
- Managing Physical documents in accordance with this policy
- Where third parties are hired to assist us with providing products and services to you for your home, we have them sign a privacy and confidentiality agreement to ensure your Personal Information will be protected by them

CreekWest Custom Homes will use all reasonable efforts to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, use, modification or destruction, through reasonable security measures. The nature of the safeguards will vary depending on the sensitivity of information collected.

CreekWest Custom Homes will take all reasonable steps in the disposal or destruction of Personal Information to seek to prevent unauthorized parties from gaining access to the Personal Information, including shredding paper records and permanently deleting electronic records.

#### RETENTION & DESTRUCTION

CreekWest Custom Homes will keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law.

CreekWest Custom Homes will maintain reasonable and systematic controls, schedules and practices for Personal Information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous. CreekWest Custom Homes will take all reasonable steps in the disposal or destruction of Personal Information, to seek to prevent unauthorized parties from gaining access to the Personal Information, including shredding paper records and permanently deleting electronic records.

#### UPDATING YOUR PERSONAL INFORMATION

CreekWest Custom Homes will do its best to ensure that your Personal Information is correct and kept current. A customer service representative will contact you to verify your Personal Information before any decisions are made for action is taken based on that information.

We will keep your Personal Information as long as is necessary to continue to meet your customer needs and any legal requirements we may have. However, once your Personal Information is no longer needed, it will be destroyed.

If your Personal Information changes, please inform us of the change and any other information you feel is necessary. Also, if your Personal Information is incorrect, then please notify us of the correct information.



## ACCESSING YOUR PERSONAL INFORMATION

Individuals have a right to access their own Personal Information that is in the custody or under the control of CreekWest Custom Homes subject to some limited exceptions provided for in the Privacy Legislation. CreekWest Custom Homes will grant individuals reasonable access to their Personal Information held by CreekWest Custom Homes. CreekWest Custom Homes will advise the individual in advance of any charges for retrieval, reproduction or delivery of the Personal Information requested.

CreekWest Custom Homes may limit or deny access to Personal Information as permitted by applicable Privacy Legislation. CreekWest Custom Homes will provide the reasons for denying access.

In order to safeguard Personal Information, an individual will be required to provide sufficient identification information to permit CreekWest Custom Homes to authorize access to the Personal Information held regarding that individual. Any such identification information will be used only for this purpose.

Individuals can obtain information or seek access to their Personal Information by contacting the CreekWest Custom Homes' Sales Manager.

## COOKIES AND OTHER TRACKING DEVICES

We may use cookies and other tracking devices on our website. The use of cookies allows us to measure site activity to provide a better user experience. Cookies and other tracking devices may be used to tell us the time and length of your visit, the pages you look at on our site, the site you visited just before coming to ours, and the name of your Internet service provider. We may use third parties to serve our advertisements on other websites. In serving our advertisements, these companies may use cookies and other tracking devices to collect certain information about your visits to our website or other websites (such as browser type, IP address, which page was visited, and time of day). We may also collect data through Google's interest-based or 3rd-party audience data (such as age, gender and interests). All of the information we collect may be used to evaluate the performance of our website and our online advertising program or to tailor promotions and other marketing messages to you. You may elect to refuse cookies. Please refer to your browser Help instructions to learn more about cookies and how to manage their use.

As you browse [www.creekwest.ca](http://www.creekwest.ca), advertising cookies will be placed on your computer so that we can understand what you are interested in. Our display advertising partners then enable us to present you with retargeting advertising on other sites based on your previous interaction with [www.creekwestcustomhomes.ca](http://www.creekwestcustomhomes.ca). The techniques our partners employ do not collect Personal Information such as your name, email address, postal address or telephone number.

## CHALLENGING COMPLIANCE



CreekWest Custom Homes will maintain procedures for addressing and responding to all inquiries or complaints from individuals about CreekWest Custom Homes' handling of Personal Information.

CreekWest Custom Homes' Sales Manager & Legal representatives, in conjunction with the appropriate parties involved, will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, CreekWest Custom Homes will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures, or disciplinary action up to and including termination. An individual will be informed of the outcome of the investigation regarding his or her complaint.

CreekWest Custom Homes will promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the file in which the Personal Information is contained. Where appropriate, CreekWest Custom Homes will notify third parties having access to the Personal Information in question about any amended information or the existence of any unresolved differences.

An individual that has concerns with CreekWest Custom Homes' privacy practices should contact CreekWest Custom Homes' Sales Manager.

#### CHANGES TO PRIVACY POLICY

This Privacy Policy may be amended from time to time, consistent with the requirements of applicable law.

#### CONTACT INFORMATION

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact the CreekWest Custom Homes' Sales Manager at [mack@creekwest.net](mailto:mack@creekwest.net). We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you.

If you are unsatisfied with our response, you may be entitled to make a written submission to the Provincial Privacy Commissioner, if any, applicable for your location.

