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## Privacy Code of Conduct

This policy statement outlines the Company's Code of Conduct for Privacy, which applies equally to all employees.

Compliance with this code by all employees is mandatory. Employees must sign off on the privacy code of conduct annually.

If an employee is in doubt about the application of the code, the employee should discuss the matter with the person to whom they report or a person at the management level.

In the regular course of business, the company accumulates a considerable amount of "sensitive" client and other information. The following principles are to be observed in relation to all personal information collected and retained by **HamiltonDavis Home Care, Inc.**

### ***Obtaining and Safeguarding Information***

Only such information as is necessary to the Company's business should be collected, used and retained. When personal information is needed, wherever possible it should be obtained directly from the person concerned. Employees should take reasonable steps to ensure only reputable and reliable sources are used to supplement this information.

Information should only be retained as long as it is needed or as required by law, and such information should be physically secured and protected.

Information with respect to personal information regarding employees or clients and contained in Company files, must not be disclosed to any individual by any employee unless and until proper authorization for such disclosure has been obtained from the relevant party.

Personal and sensitive information should never be sent over the public networks by e-mail unless secured by encryption.

### ***Access to Information***

Internal access to personal information should be limited to those with a legitimate business reason to seek the information. Personal information should only be used for the purposes for which it was originally obtained. The consent of the person concerned should be obtained before there is external disclosure of personal information unless provided otherwise by legal process or contractual arrangement.

**HamiltonDavis Home Care, Inc.** recognizes that all persons have the right to review and have access to their personal records retained by the Company. This right is subject to a corresponding right to privacy of the source of such information, recognizing that some information is not to be disclosed due to legal and ethical prohibition or privilege.

**"I have read and understand the  
Privacy Code of Conduct"**

**Employee Name:** \_\_\_\_\_

**Employee Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_