



# PERSONAL INFORMATION PROTECTION POLICY

## 1. ACCOUNTABILITY

- 1.1. Kelly's Salon Services Unbound Inc. is committed to safeguarding the personal information entrusted to us by our clients and has designated an individual who is accountable for the organization's compliance with this policy.
- 1.2. Our privacy policy is based upon the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's Personal Information Protection and Electronic Documents Act.
- 1.3. This policy outlines the principles and practices we follow in protecting your personal information.
- 1.4. This policy applies to Kelly's Salon Services Unbound Inc. The policy also applies to any person providing services on our behalf.
- 1.5. A copy of this policy is provided to any client on request.
- 1.6. For purposes of this policy, the terms "we," "us," and "our" refer to Kelly's Salon Services Unbound Inc.

## 2. IDENTIFYING PURPOSES

- 2.1. 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, and an identifying number.
- 2.2. We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:
  - Open and manage an account
  - Keep a log of client appointments
  - Contact clients about appointments
  - Follow up with clients to determine satisfaction with products and services
  - Provide appropriate hair care and esthetics products and services to customers and clients



- Deliver requested products and services
- Notify clients of upcoming events of interest
- Meet regulatory requirements

2.3. We normally collect client information directly from our clients. We may collect your information from other persons with your consent or as authorized by law. We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. However, we don't provide this notification when a client volunteers information for an obvious purpose (for example, producing a credit card for payment when the information will be used only to process the payment).

### 3. CONSENT

3.1. 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.

3.2. We may assume your consent in cases where you volunteer information for an obvious purpose.

3.3. 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), in writing (by signing a consent form, by checking a box on a form, or electronically (by clicking a button).

3.4. In cases that do not involve sensitive personal information, we may rely on "opt-out" consent. For example, we may disclose your contact information to other organizations that we believe may be of interest to you, unless you request that we do not disclose your information. You can do this by checking the appropriate box on our application form or by telephoning our local number/toll-free number.

3.5. 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 fulfill 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.

3.6. We may collect, use or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to



our organization, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

- 3.7. With your consent, we may collect Personal Information from you in person, over the telephone or by corresponding with you via mail, facsimile, or the Internet.

#### 4. LIMITING COLLECTION

- 4.1. The Personal Information collected will be limited to those details necessary for the purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing services or information to our customers and clients.
- 4.2. We use only fair and lawful methods to collect Personal Information.

#### 5. LIMITING USE, DISCLOSURE, AND RETENTION

- 5.1. We retain client personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.
- 5.2. We render client personal information non-identifying, or destroy records containing personal information once the information is no longer needed.
- 5.3. We use appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records.

#### 6. ACCURACY

- 6.1. We make every reasonable effort to ensure that client information is accurate and complete as is necessary to fulfill the purposes for which it is to be used.
- 6.2. We rely on our clients to notify us if there is a change to their personal information that may affect their relationship with our organization.
- 6.3. 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.



## 7. SAFEGUARDS

- 7.1. We protect client 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.

## 8. OPENNESS

- 8.1. We will make information available to you about our policies and practices with respect to the management of your Personal Information.

## 9. INDIVIDUAL ACCESS

- 9.1. Upon request, you will be informed of the existence, use and disclosure of your Personal Information, and will be given access to it.
- 9.2. You may verify the accuracy and completeness of your Personal Information, and may request that it be amended, if appropriate. However, in certain circumstances permitted by law, we will not disclose certain information to you. For example, we may not disclose information relating to you if other individuals are referenced or if there are legal, security or commercial proprietary restrictions.
- 9.3. You may make a request for access to your personal information by writing to Kelly Sperry.
- 9.4. You must provide sufficient information in your request to allow us to identify the information you are seeking.
- 9.5. We will respond to your request within 45 calendar days, unless an extension is granted.



## 10. CHALLENGING COMPLIANCE

- 10.1. If you have a question or concern about any collection, use or disclosure of personal information by Kelly's Salon Services Unbound Inc., or about a request for access to your own personal information, please contact:

Kelly Sperry, President  
Kelly's Salon Services Unbound Inc.  
613-558-0668  
[kssuinc@gmail.com](mailto:kssuinc@gmail.com)

- 10.2. If you are not satisfied with the response you receive, you should contact:

Office of the Privacy Commissioner of Canada  
30 Victoria Street, 8th floor  
Gatineau, QC  
K1A 1H3  
Telephone: (819) 994-5444  
Toll-free: 1-800-282-1376  
TTY: (819) 994-6591

## 11. ADDITIONAL INFORMATION

### 11.1. Cookies

- A cookie is a small computer file or piece of information that may be stored in your computer's hard drive when you visit our websites. We may use cookies to improve our website's functionality and in some cases, to provide visitors with a customized online experience.
- Cookies are widely used and most web browsers are configured initially to accept cookies automatically. You may change your Internet browser settings to prevent your computer from accepting cookies or to notify you when you receive a cookie so that you may decline its acceptance. Please note, however, if you disable cookies, you may not experience optimal performance on our website.



## 11.2. Other Websites

- Our website may contain links to other third party sites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave our website. Additionally, we are not responsible for the privacy practices employed by third party websites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.