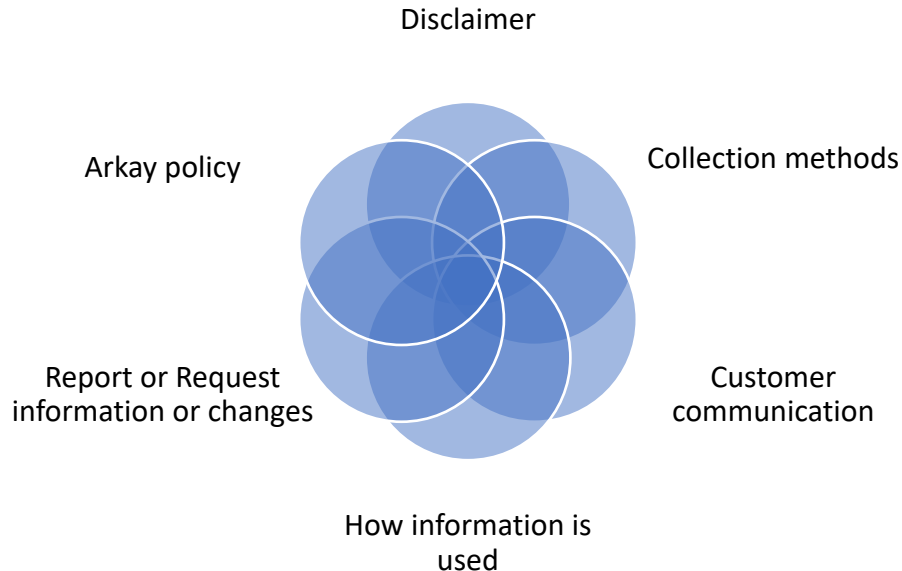


Arkay has a website where workers and clients can communicate through several online and public applications. This document defines Arkay Contracting Ltd.'s policies and procedures for protecting and using collected confidential information.

- Arkay follows the BC Personal Information Protection Act for Businesses and Organizations.
- A business or organization cannot contract out any Personal Information Protection (PIPA) rules.
- PIPA supersedes other acts of British Columbia.

Source: Office of the information and Privacy commissioner of British Columbia
Toll free in BC 1.800.663.7867
www.oipc.bc.ca
E-mail: info@oipc.bc.c

ATTRIBUTES of ARKAY'S PRIVACY POLICY and PROCEDURES



The above diagram shows the parts of Arkay's website privacy policy and procedures. All information on the Arkay website is reviewed for accuracy, origin, ownership, and provincial copyright laws.

**It is vital to not be complacent when dealing with information.
Think twice and make sure of your responsibilities.**

Arkay website fair information principles and procedures:

Disclaimer	Arkay evaluates all content. Any questions should be directed to: Arkay Contracting Ltd. 6436 McKenzie Dr. Delta, BC, V4E 1N9 f. 778-590-5202 arkay@telus.net	Reviewed on a case-by-case basis.
Collection methods	Personal information collected by Arkay: - Visits to website - Workers completing TM's - Worker correspondence - Benefits - Payroll - Client emails - Confidential calls - WorkSafeBC correspondence	Reviewed every year.
Customer communication	Arkay will respond to all customer requests.	A list of all requests is kept for one year.
How information is used	All information collected is for running and managing Arkay's business. Arkay will not provide documents to a third party without consent from the individual, or at the request of legal agencies.	Reviewed every year. Requests are kept for 3 years.
Report or Request information or revisions	The request or reporting of confidential information must be in writing.	This is to protect the worker, the requesting authority, and Arkay.
Arkay policy	New information gathered is assessed in terms of its importance to Arkay business, and the level of security it requires to keep is safe.	Reviewed annually, and as needed.

Accountability	Arkay documents for the purpose for collecting all information. If information is used for additional purposes other than as documented, the purpose will also be documented.	The following are fair information principles: <ul style="list-style-type: none"> - Appoint someone to be responsible for Arkay's PIPEDA compliance. - Develop and implement policies and practices. - Update collection and destruction procedures.
Identifying purpose	Arkay will only collect information for which they have identified as necessary to their business.	<ul style="list-style-type: none"> - Why do we collect it? - How do we collect it? - What do we use it for? - Where do we keep it? - How is it secured? - How is it discarded?
Consent	<ul style="list-style-type: none"> - Arkay will ask the individual for their consent to have their personal information collected, except when inappropriate. - Meaningful consent means that the party giving consent understands what they are consenting to including the nature and purpose and consequences of their consent. 	<ul style="list-style-type: none"> - Keep a record of all purposes and consents collected. - When requesting personal information, explain the purpose. - When requesting consent for the right to use third party content or information, a written agreement is required.
Limiting collection	Arkay reviews why information is collected and, wherever possible, limits the amount of information and clearly defines the life value cycle of the information.	<ul style="list-style-type: none"> - Only collect information that Arkay requires to fulfill an identified purpose. Information for one purpose will not be used for another purpose without a review. - Collect information lawfully.
Limiting use, disclosure, and retention	All information collected is to be solely used for the reason it was collected and kept only as needed or relevant.	Develop and implement procedures for disclosure and retention.
Accuracy	Information is reviewed for accuracy. Information has life and when it is no longer of value to Arkay's business, it is destroyed.	Keep information up-to-date and implement review procedures for assessing information collected.

Safeguards	Arkay protects all information appropriate to the sensitivity of the information.	Methods of protection include physical, limited access as in need-to-know, passwords and encryption, keeping safeguards up to date, and educating the management team on the importance of safeguards.
Openness	Arkay workers have access to Arkay policies relating to the management of personal and confidential information.	Refer to Arkay's Fair Practices Checklist.
Individual access	An Arkay worker can request to review the information that Arkay has collected. The individual may question the accuracy of collected information and, after review, have it amended as appropriate.	Workers have the right to access their personal information held by Arkay. The request must be made in writing.
Challenging compliance	Any challenge by an Arkay worker will be investigated without exception.	Any request to challenge Arkay's compliance with fair information procedures is to be in writing to the appointed person for PIPA.
Worker correspondence	All questions will be addressed in a timely manner. Arkay will inform the worker of the progress if a resolution will require a longer time, e.g., over 30 days.	Arkay workers are to send an email or letter, dated and signed, so that their request can be reviewed and referred by Arkay.
A security breach	A detailed description of the circumstances is required. If the cause is known, it also is to be recorded.	<ul style="list-style-type: none"> - A record of all breaches is to be kept. - The steps introduced to reduce the harm to the affected individual/s are required. - Provide the new safety measures that have been implemented to ensure a similar breach will not occur.