

## Ayni Conceptions' Privacy Policy

**Objective:** To protect the information of clients, partners and contractors of Ayni Conceptions.

**Policy:** Ayni Conceptions is committed to protecting the personal information of its clients, partners and contractors. Ayni Conceptions respects their privacy and safeguards their personal information.

This policy outlines the principles and practices Ayni Conceptions follows in protecting the personal information of clients, partners and contractors. Ayni Conceptions' privacy commitment includes ensuring confidentiality, and security of our clients', partners' and contractors' personal information and allowing our clients', partners' and contractors' to request access to, and correction of, their respective personal information.

### Collecting Personal Information

Ayni Conceptions will inform its clients, partners and contractors of why and how it collects, uses and discloses their personal information, obtain their consent where required by law, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

Ayni Conceptions will only collect and use personal information from its clients, partners and contractors that is necessary to fulfill the following purposes:

- To verify identity;
- To deliver requested products and services
- To ensure a high standard of service
- To meet regulatory requirements

Personal information may include details about an identifiable individual such as their name, age, contact information and credit card numbers.

Ayni Conceptions also has the capacity to generate statistics from the use of the website [www.ayni.ca](http://www.ayni.ca). These anonymized and aggregated statistics are collected to improve the website for future visitors. Also, this site does not provide facilities for the secure transmission of information across the Internet. Users should be aware that there are inherent risks in transmitting information across the Internet. Finally, Ayni Conceptions may create links to third party websites. Ayni Conceptions is not responsible for the content or privacy practices employed by websites that are linked from Ayni Conceptions's website.

This policy is available on Ayni Conceptions's website.

**Procedures:** *Obtaining Consent*

Ayni Conceptions will obtain clients, partners and contractors consent to collect, use or disclose personal information (except where, as noted below, Ayni Conceptions is authorized to do so without consent).

Consent can be provided orally, in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the clients, partners and contractors voluntarily provides personal information for that purpose.

Consent may also be implied where clients, partners and contractors are given notice and a reasonable opportunity to opt-out of his or her personal information being used for the marketing of new services or products, and the clients, partners and contractors do not opt-out.

Except in certain circumstances as permitted by law (ea. the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients, partners and contractors can withhold or withdraw their consent for Ayni Conceptions to use their personal information in certain ways. A client's, partner's or contractor's decision to withhold or withdraw their consent to certain uses of personal information may restrict Ayni Conceptions's ability to provide a particular service or product. If so, Ayni Conceptions will explain the situation to assist the client, partner or contractor in making the decision.

*Use and Disclosure*

Ayni Conceptions may use or disclose personal information without the clients, partners and contractors knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When Ayni Conceptions requires legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect the organization from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law.

The President can give access to this information to a contractor, as long as they have read and signed off on the present policy.

### **Securing personal information**

Ayni Conceptions is committed to ensuring the security of clients', partners' and contractors' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. The following security measures will be followed to ensure clients', partners' and contractors' personal information is appropriately protected.

All clients', partners' and contractors' personal information is kept in cabinets within Ayni Conceptions' office. Only the President of Ayni Conceptions has access to these cabinets.

Ayni Conceptions will use appropriate measures when destroying personal information such as using a shredding machine.

### **Access**

Clients, partners and contractors have a right to access their personal information. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. Ayni Conceptions will make the requested information available within thirty (30) business days, or provide written notice of an extension where additional time is required to fulfill the request.

If the client, partner or contractor wants a copy of their personal information, a minimal fee may be charged. Where a fee may apply, Ayni Conceptions will inform the client, partner or contractor of the cost and request further direction from the client, partner or contractor on whether or not Ayni Conceptions should proceed with the request.