

## **Privacy Commissioner of Canada**

**PACIFIC RIM ADMINISTRATION SERVICES LTD.** shall abide by the principles of the “Personal Information Protection and Electronic Documents Act” in the following manner.

### **APPENDIX “A”**

#### **Principles in Summary**

Pacific Rim sets out the following guides in response to Appendix “A”. As stated in Appendix “A”, Pacific Rim acknowledges that their own standards may have to be modified from time to time to keep in line with the Principles of the Act.

#### **1. Accountability**

Pacific Rim has established a committee responsible for the control and maintenance of all records in written or electronic form on behalf of each individual covered by each and every type of coverage offered or maintained by the company. The three individuals who have the responsibility of being accountable to each client are:

- (a) Douglas D. Anderson – President and Privacy Officer
- (b) Leslie I. Crisp – Executive Administrator
- (c) Lydia Flick – Claims Manager

#### **2. Identifying Purposes**

Personal information gathered by Pacific Rim shall be limited to names, addresses, dates of birth, SIN (if agreed to by the employee/client) and physician and dentist. This information and any other medical or dental information shall only be gathered and recorded to enable Pacific Rim to pay qualifying claims; or bill or invoice appropriate premiums or contributions.

#### **3. Consent**

Each employee acknowledges that information given to Pacific Rim is only relevant to the claims payment by signing the enrolment card. That information is also relevant with regard to marital status, sex and other criteria for billing or invoice purposes. Any person or persons requesting information concerning a specific employee covered by Pacific Rim, whether by an employer or authorized employee of an employer; or anyone other than the specified employee, shall be denied any information. Medical and other personal family information may be provided if the request is made with written consent of the specified employee.

#### **4. Limiting Collection**

Any information, in addition to the claims and billing or invoice data mentioned in the previous points of compliance, shall be accompanied by an explanation by Pacific Rim as to the necessity of having requested such data.

## **5. Limiting Use, Disclosure and Retention**

All records collected by Pacific Rim are deemed private and confidential, and are the sole property of Pacific Rim on behalf of the benefits of each client or employee. Pacific Rim has safeguarded their offices and their computers (computer files) along with using encrypted services for their computer files to protect their clients' information.

Pacific Rim shall retain any and all records on behalf of each employee and/or client only so long as it is relevant to the contractual agreement between Pacific Rim and each contract holder.

Pacific Rim may be obligated to retain some or all of the information to comply with the requirements of the Canada Revenue Agency. Except for income tax purposes, Pacific Rim Administration Services Ltd. shall feel justified to have at all auditors sign a document to guarantee the protection of the personal privacy of each employee.

## **6. Accuracy**

Pacific Rim shall allow, at any time with reasonable notice and during office hours, an employee to review their personal records or data, to make certain that the information is accurate, or if the information requires updating.

## **7. Safeguards**

Through encrypted safeguards of the software programs owned exclusively by PRAS Ltd., and security safeguards at the offices of Pacific Rim, everything has been and will be done to protect the records of each client. The sensitivity of the health and dental records of each client is always foremost in the minds of the management and employees of Pacific Rim.

## **8. Openness**

Any employer or employee shall be given specific information about its policies and practices relating to the management of their personal information. This request must be made in either writing or by phone or E-mail to a member of the aforesaid mentioned Compliance Committee.

## **9. Individual Access**

- a) Pacific Rim shall allow any client or employee the right to review their personal medical and dental records. The client or employee is asked to ascertain whether the office of the company is open for business to make certain a member of the Compliance Committee will be on hand to provide only their personal information. The enquiring party shall not have the right to any other client or employee's information.
- b) A Participant Employer shall not have the right to the financial records of Pacific Rim Administration Services Ltd. The Participant Employer or their representative shall not have access to the medical records of an employee without the written authorization of the employee.
- c) Pacific Rim may request further legal advice for the employee's protection, if the information requested may be considered detrimental for the employee or their families' security or well being.

- d) Any covered individual or Participant Employer shall have the right to challenge the accuracy or completeness of the information held on behalf of the contract holder or themselves with respect to their coverage through Pacific Rim.

#### **10. Challenging Compliance**

Any individual or Participant Employer shall have the right to challenge the compliance of Pacific Rim with regard to these principles. The challenge has to be addressed to one of the three individuals (Compliance Committee) responsible for the compliance of this Privacy Legislation.

#### **11. Our Commitment**

It is understood that the privacy of every individual, employee or other covered members' personal information is to be protected. Although the "Personal Information Protection and Electronic Documents Act" was passed in 2001, effective January 1, 2004 the law was to be followed by all providers of group benefits. Every provider is compelled to adhere to the principles of any and all Privacy Legislation in Canada. This is either under the "Personal Information Protection and Electronic Documents Act" of Canada, or any "Provincial Information Protection and Electronic Document Act". Pacific Rim shall abide by these rules, guidelines and laws.

#### **12. The Clients Commitment**

Each employer is expected to adhere to the rules, guidelines and laws protecting each of their employees or members covered through the contract and /or insurance policies provided by Pacific Rim.

- (a) Claims amounts may be disclosed with regard to statement of accounts.
- (b) Names shall not be provided or attributed to particular claims for group participants, to the employer, association or union representatives unless every member of the recognized group signs an acceptance form allowing this information to be shared.
- (c) THE ACTUAL CLAIM INFORMATION shall never be provided to the employer, association or union representatives. The medical information of the employee and their families are protected under the rules provided in this document copy signed by each member's enrollment card.

**PACIFIC RIM ADMINISTRATION  
SERVICES LTD.**

*Douglas D. Anderson*

Douglas D. Anderson  
President