



## **Charlton Strategic Research Inc. Corporate Privacy Policy**

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Charlton Strategic Research Inc. (Charlton Research) respects the privacy of our project [respondents](#) whenever they provide us with [personal information](#) in any form. Our commitment to privacy protection is an important part of our dealings with respondents, clients, and suppliers alike.

Any personal information we collect or receive about our respondents is treated in compliance with the applicable privacy laws and regulations, including the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA). Unless express [consent](#) is received to share personal information, all quantitative and qualitative research results are reported on an [aggregate](#) basis without the use of personal identification of the respondent.

Charlton Research will continue to review and revise its Privacy Policy to ensure that it is relevant and remains current with changing industry standards, technologies and laws.

### [The Scope and Application of Charlton Research's Privacy Policy](#)

#### [Definitions](#)

#### [1: Accountability](#)

#### [2: Purposes for Collection of Personal Information](#)

#### [3: Obtaining Consent for Collection, Use or Disclosure of Personal Information](#)

#### [4: Limiting Collection of Personal Information](#)

#### [5: Limiting Use, Disclosure, and Retention of Personal Information](#)

#### [6: Accuracy of Personal Information](#)

#### [7: Security Safeguards](#)

#### [8: Openness Concerning Policies and Procedures](#)

#### [9: Individual Access to Personal Information](#)

#### [10: Challenging Compliance](#)

#### [Additional Information](#)

## **The Scope and Application of Charlton Research's Privacy Policy**

Charlton Research's Privacy Policy has been drafted to reflect [personal information](#) issues specific to Charlton Research.

Charlton Research's Privacy Policy applies to personal information collected, used or [disclosed](#) in any form whether oral, electronic or written. This policy does not impose any limits on the collection, use, or disclosure of 'non-personally identifiable' information (i.e. Information that cannot be linked back to an individual) or business contact information of an employee of an organization.

## **Definitions**

**Personal information:** Any information that is identifiable with an individual, but does not include the name, title, business address or contact information of an employee of an organization, or publicly available or publicly listed information.

**Respondent:** A member of the public who provides personal information to Charlton Research in the course of a survey conducted by Charlton Research.

**Aggregate information:** Non-identifiable information that cannot be associated with, or traced back to, a specific individual.

**Consent:** Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative.

**Express consent** can be given orally, electronically or in writing, but is always unequivocal or explicit, and does not require any inference on the part of Charlton Research.

**Implied consent** is consent that can reasonably be inferred from an individual's action or inaction.

**Disclosure:** Making personal information available to a third party.

**Third party:** An individual or organization outside of Charlton Research.

## **Charlton Research Privacy Principles**

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### **Principle 1: Accountability**

***Charlton Research is responsible for personal information in its possession or control and shall designate one or more persons who are accountable for Charlton Research's compliance with the principles outlined below.***

The Charlton Research Privacy Officer is responsible for compliance with the provisions of this policy and can be contacted by email at [mkishibe@charltoninc.com](mailto:mkishibe@charltoninc.com), by fax (416.480.2950) or by mail (62 Alvin Ave \_ Toronto ON \_ M4T 2A9).

Other individuals within Charlton Research may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

Charlton Research is responsible for personal information in its possession or control and shall use *contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.*

## **Principle 2: Purposes for Collection of Personal Information**

*Charlton Research shall identify the purposes for which personal information is collected at or before the time the information is collected.*

Charlton Research collects personal information from the public for the following purposes:

- (a) to conduct quantitative or qualitative marketing and social research;
- (b) to understand respondent opinions to establish suitability for further quantitative and qualitative marketing and social research; and
- (c) to meet legal and regulatory requirements.

Charlton Research does not collect personal information for the purposes of sales or direct marketing without express consent. We do not sell, rent or trade in personal information. Respondents may withdraw consent to our use of personal information at any time. Once the information is no longer required for the purposes outlined above, it will be deleted.

Charlton Research may provide clients or other third parties with information from any survey, in aggregate form. In aggregate form, it is impossible to identify an individual respondent's personal information.

## **Principle 3: Obtaining Consent for Collection, Use or Disclosure of Personal Information**

*The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate.*

Participation by respondents in Charlton Research projects is always voluntary. When a respondent agrees to participate in a survey, he/she gives consent to the interview by participating. In obtaining consent, Charlton Research shall use reasonable efforts to ensure that a respondent is advised of the identified purposes for which personal information will be used or disclosed. A respondent is always free to choose whether or not to participate in a survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

Generally, Charlton Research shall seek consent to use and disclose personal information at the same time it collects the information. However, Charlton Research may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, Charlton Research shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents. The participation of a respondent in a quantitative or qualitative research study may constitute implied consent for Charlton Research to collect, use and disclose personal information for the identified purposes.

#### **Principle 4: Limiting Collection of Personal Information**

*Charlton Research shall limit the collection of personal information to that which is necessary for the purposes identified by Charlton Research. Charlton Research shall collect personal information by fair and lawful means.*

In conducting surveys, Charlton Research limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to respondents.

Charlton Research collects personal information about an individual respondent primarily from that individual or a member of that individual's household. Except as permitted by law, Charlton Research will only collect personal information from external sources, such as client organizations, if individuals have consented to such collection.

#### **Principle 5: Limiting Use, Disclosure, and Retention of Personal Information**

*Charlton Research shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.*

Charlton Research may disclose a respondent's personal information to:

- (a) a client of Charlton Research where the respondent has consented to such disclosure;
- (b) a third party engaged by Charlton Research to perform functions on its behalf (e.g. recruiting or data processing affiliates);
- (c) under limited circumstances, to a third party or parties, where the respondent consents to such disclosure, or disclosure is required or permitted by law.

Affiliates which perform services on our behalf and other third parties to whom we may provide information must adhere to our privacy standards. When providing personal information to third parties, we provide only that information that is required in the circumstances. Information provided to third parties is used only for the purposes stipulated and is subject to strict terms of confidentiality.

Depending on the circumstances, where a respondent may have to be re-contacted for purposes of clarifying responses to a survey, or to seek additional responses, Charlton Research shall retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

Charlton Research shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction that applies to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

## **Principle 6: Accuracy of Personal Information**

*Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.*

Personal information used by Charlton Research shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a respondent.

Charlton Research shall update personal information about respondents as necessary to fulfill the identified purposes or upon notification by the individual.

## **Principle 7: Security Safeguards**

*Charlton Research shall protect personal information by security safeguards appropriate to the sensitivity of the information.*

Charlton Research shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

Charlton Research shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of Charlton Research's employees with access to personal information shall be required to respect the confidentiality of that information.

## **Principle 8: Openness Concerning Policies and Procedures**

*Charlton Research shall make specific information about its policies and procedures relating to the management of personal information readily available to individuals.*

Charlton Research shall make information about its policies and procedures easy to understand, including:

- (a) the title and address of the person or persons accountable for Charlton Research's compliance with its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- (b) the means of gaining access to personal information held by Charlton Research;
- (c) a description of the type of personal information held by Charlton Research, including a general account of its use; and
- (d) a description of what personal information is made available to related organizations (e.g. subsidiaries).

## **Principle 9: Individual Access to Personal Information**

*Upon request, Charlton Research shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.*

Upon written request to the Privacy Officer, Charlton Research will inform an individual of the existence, use and disclosure of his/her personal information and shall be given access to that information

In certain situations, Charlton Research may not be able to provide access to all the personal information that it holds about a respondent. For example, Charlton Research may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Charlton Research may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a respondent may be required to provide sufficient identification information to permit Charlton Research to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

Charlton Research shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Charlton Research shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

## **Principle 10: Challenging Compliance**

*An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Charlton Research's compliance with the Charlton Research Privacy Policy.*

Charlton Research shall maintain procedures for addressing and responding to all inquiries or complaints from its respondents regarding Charlton Research's handling of personal information.

Charlton Research shall, on written request, inform its respondents about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with the Charlton Research Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

Charlton Research shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, Charlton Research shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The respondent shall be informed of the outcome of the investigation regarding his or her complaint.

## **Additional Information**

For more information regarding the Charlton Research Privacy Policy, please contact our Privacy Officer by e-mail [mkishibe@charltoninc.com](mailto:mkishibe@charltoninc.com) or by fax or mail at: 62 Alvin Ave \_ Toronto ON \_ M4T 2A9 \_ 416.480.2950 (fax).

Visit the Privacy Commissioner of Canada's website at [www.privcom.gc.ca](http://www.privcom.gc.ca)