

Privacy and Confidentiality Policy

Privacy Statement

At PIC, the basis of each customer relationship, many of which span many years, is trust. You have chosen to do business with PIC, and we are obligated to honor that relationship with great care, beginning with the information you have chosen to share with us. As financial services professionals entrusted with sensitive information, we respect the privacy of our clients, and the privacy of their customers, and are committed to treating customer's information responsibly. Our Privacy Policy serves as a standard for all PIC employees for the collection, use, retention, and security of private information.

Customer Expectation of Privacy

We believe that the confidentiality and protection of customer information is one of our fundamental responsibilities. While information is critical to providing quality services, we recognize that one of our most important assets is our client's trust, and our integrity in doing business. We will maintain high standards to ensure that information is kept private and secure at all times.

Limitations on Employee Access to Information

Employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer's information and in this Privacy Policy. Due to the importance of these issues, all PIC employees are responsible for maintaining the confidentiality of customer information, and employees who violate this Privacy Policy are subject to disciplinary measures.

Protection of Information via Established Security Procedures

PIC is committed to the security of personal information. All of our operational and data processing systems are in a secure environment that protects information from being accessed by third parties. We maintain and grant access to customer information only in accordance with our internal security standards, and in accordance to applicable law.

Restrictions on the Disclosure of Account Information

We do not reveal information about accounts or other personally identifiable data to third parties and companies for their independent use unless: 1) you request or authorize it; 2) the information is provided to help complete a transaction initiated by you; 3) the disclosure otherwise is lawfully permitted or required.

We observe the same policy in dealing with your customers.

Maintaining Privacy in Business Relationships with Third Parties

When our firm conducts business with third parties such as brokers, lending institutions, suppliers, technicians, and the like, we require these vendors and suppliers to maintain similar standards of conduct regarding the privacy of personally identifiable customer information provided to, or accessible by them.

Providing Privacy Information to Clients and Responding to Inquiries

PIC recognizes and respects the privacy expectations of all individuals. We want our clients to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed a Privacy Policy, which is made readily available to our clients. Clients who have questions about this Privacy Policy or have a question about the confidentiality of their clients' information should call PIC at 905-886-0555 ext 3466 Anthony G Fiore, V.P of Operations, or email @ a.fiore@partnersincredit.com

OUR PRIVACY PRINCIPLES

We are a debt collection agency attempting to collect a debt and any and all information we obtain will be used for that purpose.

We do not sell, rent, loan or by any other means allow any other party to access any information that is given to us, unless we are required to do so by law.

To serve our clients as effectively as possible, we must make use of information. At the same time, we want our clients to be confident that their information and their relationship with their clients will be kept confidential. Therefore, we have adopted the following privacy principles to safeguard our business partners from detrimental situations caused by breaches of privacy policy.

- 1. Recognition of a Person's Expectation of Privacy** We recognize and respect the privacy expectations of all people and make the safekeeping of all information a priority.
- 2. Use, Collection and Retention of Information** We will collect, retain and utilize all information that we believe will be useful to conduct our business and to provide quality services to our clients. We will not obtain personal identifying information from or about children.
- 3. Maintenance of Accurate Information** We have established procedures to ensure that information is accurate, current and complete in accordance with reasonable business practices.
- 4. Employee Education** Our employees are educated on the importance of maintaining the confidentiality of information and of our privacy policy. In the event of a privacy breach by an employee, appropriate disciplinary action will be taken.
- 5. Protection of Information via Established Security Procedures** We will maintain physical, electronic and procedural safeguards to guard against unauthorized access to information.
- 6. Restrictions on the Disclosure of Information** We will not reveal information to unaffiliated third parties for their independent use. However, we recognize the following exceptions, permitted by law, and therefore may provide specific information when:
 - we are expressly authorized to provide such information by the individual
 - it is necessary to verify the accuracy of information provided to us with reputable information reporting agencies or merchants in accordance with standard financial industry practice
 - We must comply with certain laws that require mandatory disclosure of information. In such instances, we will limit disclosure to what is required by law.

The Privacy Policy

The privacy policy is made available and easily accessible to all employees. The policy is included in employee handbooks and company intranets. We include the privacy policy in all applicable employment contracts. In this way the employee must acknowledge in writing that he/she is aware of the privacy policy and of the obligation to adhere to it. When the policy is updated a new copy is circulated via email as well as on paper, and prepared for insertion into our handbooks. We have each new update signed by employees.

Enforcing the Privacy Policy

Provide training

We regularly train staff in applying the privacy policy. Through role playing seminars we test our employees to ensure that they are fully aware of what information is private, and what can be disclosed. This training is ongoing and random checks are done frequently throughout the company, with “test calls” being made by our Quality Assurance Department.

Take prompt action

If an employee commits a breach of our privacy policy, it is dealt with fairly and quickly. Internal procedures are in place in order to allow investigation into complaints of privacy policy breaches.

Employees are also encouraged to come forward if they are witness to any such breaches by other staff members.

Monitor Telephone Interactions

The monitoring of telephone interactions is the most advantageous way to ensure that no privacy policy rules are being breached. Our Quality Assurance Department ensures that all staff, regardless of their primary responsibilities, are aware, and are in compliance with our privacy policy, in all situations where there is a possibility of breach.

Partners In Credit Inc. Confidentiality & Integrity of Personal Information Privacy Policy

Partners In Credit restricts access of information to those employees who need to know that information for the purpose of accomplishing all of their responsibilities within their role in our firm. Employees are provided with general privacy guidelines, and further guidelines specific to their roles within our organization

We maintain physical, electronic, and procedural safeguards that comply with federal regulations, and our firm’s mandate, to guard private information.

Definition of Private Information

For the purposes of this policy, "private information" means any information that could serve to identify or characterize an individual, their financial dealings or status, and or details pertaining to our business relationship to that individual, such as:

- Financial delinquency status

- Legal status

- Marital status

- Gender / Race / Religion

- Physical addresses

- E-mail addresses

- Telephone numbers

- Social Security Number

- Credit card information

- Bank account information

Any combination of personal information that could be used to determine identity or divulge characteristics of the statuses mentioned above

- We will not attempt to obtain personal information from or about children