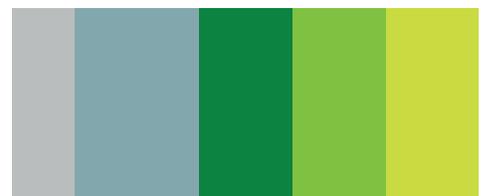


# PRIVACY POLICY

PERSONAL INFORMATION PROTECTION &  
ELECTRONIC DOCUMENTS ACT (PIPEDA)  
COMPLIANCE GUIDE



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# RENTCHECK'S APPROACH to the Collection, Use & Disclosure of Personal Information

## Corporate Overview

RentCheck Credit Bureau (RentCheck) is a credit and tenancy information and software services company and a licensed credit reporting agency operating across North America. We serve both tenancy applicants and the tenancy granting business community by providing credit and tenancy information and risk management tools to help our clients make informed decisions

RentCheck was formed in 1976 with the goal of offering the highest quality tenancy and credit related products and services to the Canadian housing industry market. RentCheck has automated most data processing and maintenance functions and continually works with its clients to improve information business processes to enhance performance and promote speed and accuracy.

Long before the *Personal Information Protection and Electronic Documents Act* came into force in 2001, RentCheck was regulated by provincial tenancy applicant reporting legislation designed to protect the privacy of credit information and to ensure the fairness and accuracy of credit-reporting systems. Therefore, RentCheck has a long history of compliance with legislative and regulatory requirements.

## RentCheck's Business Overview

We facilitate tenancy applicant transactions by providing tenancy reports to our clients,

which include housing providers, realtors, and other institutions. By their nature, these tenancy reports must include some personal information about tenancy applicants. Accordingly, we regularly collect, use and disclose personal credit information of Canadian tenancy applicants. Credit and tenancy grantors and other institutions provide RentCheck with factual information about how their clients pay their bills and other debts. Credit reporting agencies, such as RentCheck, compile and assemble this information, along with public record information, into a "file" for each tenancy applicant. In return, Page 3 To contact the Privacy Officer call: 1.800.LAND-LORD (522.3567) extension 222 credit and tenancy grantors and authorized institutions, pursuant to the applicable provincial credit reporting legislation, are able to obtain credit and tenancy reports about tenancy applicants.

RentCheck generates thousands of credit and tenancy reports every year to make tenancy leasing fast, easy and safe for qualified applicants. The availability of these reports benefits both tenancy grantors and tenancy applicants. The credit and tenancy reports allow our clients to make informed credit decisions and portfolio management decisions based on reliable information and tenancy applicants, in turn, benefit from rapid access to creating good rent payment tradelines that improve credit facilities in

order to purchase cars, major appliances and other house hold items. We also provide a suite of consumer authentication services to assist our clients in identifying potentially fraudulent transactions. In the course of providing these services, we may use personal information contained in our credit and tenancy reports to see if it matches the information that has been provided by an applicant, typically to credit and tenancy granting institutions or

merchants. When we provide our authentication services, we typically do not disclose credit information; instead we use the report to check the information internally. While preventing fraud is in everybody's best interest, these services may benefit tenancy applicants directly if someone is attempting to pose as a tenancy applicant by misappropriating the tenancy applicant's identity and personal credit information.

## RENTCHECK IS compliant with the PIPEDA and observes the ten principles as follows.

### **Principle 1 | Accountability**

We have appointed a Chief Privacy Officer to oversee and ensure our compliance with the privacy principles established by the federal Personal Information Protection and Electronic Documents Act (PIPEDA), and with provincial privacy and credit reporting legislation. However, protecting personal information does not begin and end there: we are committed to fostering a sense of responsibility amongst our employees for protecting the privacy and accuracy of personal information while it is in our care.

Our clients have obligations to tenancy applicants when accessing personal information from us or providing personal information to us. We seek to educate our clients to ensure they understand their responsibilities regarding personal information.

### **Principle 2 | Identifying purposes**

Except where otherwise permitted by law, it is RentCheck's practice not to collect, use or disclose personal information unless an



individual tenancy applicant is aware of the purposes for which the information will be used or disclosed, and has given his or her consent to such use or disclosure.

### **Principle 3 | Consent**

RentCheck has processes in place to encourage our clients to comply with applicable law and obtain the necessary consents before ordering any reports. Such processes include entering into a binding subscriber agreement to that effect with our clients, providing compliant consent statements and conducting random audits of our clients' internal procedures; however, the responsibility for compliance ultimately rests with them.

In almost all cases, tenancy applicants will not provide consent directly to RentCheck, but to one of our clients. We work with our clients to make them aware of the importance of obtaining tenancy applicant consent prior to providing RentCheck with personal tenancy applicant information, and prior to accessing personal information contained in tenancy and credit reports.

### **Principle 4 | Limiting Collection**

The personal information appearing in our tenancy-reporting system is generally reported to us by credit and tenancy grantors or other institutions that are responsible for obtaining tenancy applicant consent to do so. However, it may also be

obtained from other sources permitted by law, including public records, federal, provincial government offices, and public registries, or collected directly from individual tenancy applicants in response to communications RentCheck has had with them. It is our policy to limit our collection of personal information to include only what is necessary to supply our clients with accurate and up-to-date information so they can make meaningful decisions about tenancy applicants and in order to provide our clients with the other services described in this Policy. RentCheck periodically reviews the data in its tenancy-reporting system to ensure that it only contains information relevant to the services we provide. Furthermore, our retention policies comply with the requirements of provincial credit reporting agency legislation. The client information collected must be limited to those details necessary for the purposes identified by RentCheck. Information must be collected by fair and lawful means.

### **Potential Information Reported In A Tenancy Report**

RentCheck credit and tenancy reports may contain the following information:

- Identifying information: tenancy applicant name, current and previous addresses, Social Insurance Number, telephone number, date of birth, and current and previous employers



- Credit and Rental history or trade lines: history of bill/debt payments to credit and tenancy grantors (such as retail stores, banks, finance companies)
- Public records: items that may affect creditworthiness, such as judgments, bankruptcies and registered items
- Inquiries: a list of credit and tenancy grantors and other parties authorized by the tenancy applicant and/or by law which have received a tenancy applicant's credit report
- Other information which could include banking information and/or collections

**RentCheck credit and tenancy reports do not contain:**

- Medical histories
- Major purchases paid in full with cash or cheques
- Business accounts, unless you are personally liable for the debt
- Race, creed, colour, ancestry, ethnicity or political affiliations

While RentCheck may furnish tenancy and credit scores to its clients based on the information contained in an individual credit-history and/or rental-history file, RentCheck only maintain or update that information in the individual tenancy applicant's rental-history file.

**Principle 5 | Limiting use, disclosure and retention**

It is our policy to limit our use of personal information to those purposes, which have been disclosed to tenancy applicants by our clients or for purposes, which are otherwise permitted by law. We use and disclose personal information to provide tenancy applicant credit and resident reporting services and other related services in accordance with Credit Reporting legislation to our clients. Accordingly, we are working with our tenancy-granting and other clients to make them aware of the importance of informing tenancy applicants of the purpose(s) for which they are providing personal information to RentCheck, or access personal information from RentCheck, at the time the information is collected from the tenancy applicant and/or prior to its use by RentCheck. Also, we require our clients to limit the use of personal information obtained from RentCheck to those purposes that have been disclosed to the tenancy applicant, and for which appropriate consents have been obtained, or is good standing information in which case is retained no longer than 20 years, or otherwise as permitted by law.

In addition, we may provide anonymous information in the form of aggregate or demographic data to our clients. Information provided in this form does not identify individual tenancy applicants.



Lastly, if RentCheck was ever sold, or if it merged with another company, or transferred part or all of our shares or assets, RentCheck may disclose and/or transfer personal information to a third party, as permitted by applicable law, provided that the third party agreed to adhere to the principles expressed in this privacy policy and the personal information did not constitute all or substantially all of the assets being transferred.

### **Principle 6 | Accuracy**

When gathering personal information, we work with our clients to increase their awareness of the importance of providing only personal information that is accurate, complete, and up-to-date. RentCheck cannot alter the information reported by our clients, unless the information is determined to be wrong, incomplete or otherwise inaccurate. If tenancy applicants do not agree with the accuracy of the information RentCheck has on file, we have procedures to ensure that such information is verified, and, where appropriate, amended or corrected. We also have an established complaint procedure to address tenancy applicant concerns and to ensure any inquiries and complaints are appropriately investigated and addressed.

When our clients base their tenancy-granting decision about a tenancy applicant on information from us, we advise them to inform their tenancy applicants that they

obtained the rental-history information from RentCheck, credit-history from Equifax Canada or TransUnion of Canada. Clients are advised to provide tenancy applicants who are declined tenancy with a toll-free number for each bureau.

Also, RentCheck clients' information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

### **Principle 7 | Safeguards**

Client information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

We take the protection of personal information seriously. We have adopted procedures to best secure storage of personal information and are committed to working with our clients to protect the security of personal information during any transfer to or from us. We have also instituted a number of safeguards to identify and prevent the fraudulent use of personal credit information. RentCheck uses firewall technology to protect its data from would-be intruders and has different processes in place to secure information such as passwords, encryption, antivirus software and physical security measures. Fraud affects us all, which is why we co-operate, to the full extent of our ability, with law enforcement officials to identify and prevent fraud. Clients are held up to a strict



test of authentication using multi-bureau security level investigations.

### Principle 8 | Openness

RentCheck makes information available to clients concerning the policies and practices that apply to the management of their information.

Tenancy files, privacy policies and procedures are also open to an inquirer who wishes to see their personal tenancy file.

### Principle 9 | Individual Access

Upon request, a client shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Clients may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate.

Tenancy applicants can always review a copy of their tenancy report to ensure that the information is current and accurate. We welcome tenancy applicants to visit our website at [www.rentcheck.ca](http://www.rentcheck.ca) to obtain more information. Tenancy applicants who have recently applied for housing may call our toll-free number at 1.800.661.7312 or 416.365.7060 anywhere in North America. Trained personnel who can assist tenancy applicants in obtaining and understanding their personal tenancy file staff our tenancy Corporate Relations Centre. Tenancy applicants can also use the toll-free number to ask about our policies and

practices relating to the management of their personal information and how to access their credit information.

Fraud affects us all, which is why we co-operate, to the full extent of our ability, with law enforcement officials to identify and prevent fraud. Clients are held up to a strict test of authentication using multi-bureau security level investigations.

### Principle 10 | Challenging Compliance

Clients may direct any questions or enquires with respect to the privacy principles outlined above or about our practices by contacting the Chief Privacy Officer, at RentCheck at 416.365.7060, or 1.800.661.7312 extension 222.

### Looking to the Future

Privacy is an evolving issue, and we are committed to working with federal and provincial Privacy Commissioners and ministries, and other stakeholders in the tenancy-reporting industry, including tenancy-grantors and tenancy applicants, to develop fair, efficient and effective policies and procedures for the preservation of the privacy and accuracy of personal information in our files.

For more information on our WebSite Privacy Protocol, please view The RentCheck WebSite Privacy Protocol.