



MEMO

TO: *I.D.E.A. Members*

FROM: *Patty Martin, I.D.E.A. Office*

DATE: *December 6, 2004*

RE: *Customer & Employee Privacy Policies*

Attached are two model privacy policies drafted by Lawson Lundell, Barristers and Solicitors on behalf of the Independent Dealers Entrepreneurial Association Inc. (I.D.E.A.). These policies include one directed to customers and the other for employees.

While the model policies are intended for the use of I.D.E.A. members and are tailored to your expected generic requirements, because of the differing circumstances and jurisdictions of each member, before they are implemented it will be important for you to review the policies to ensure they address their specific circumstances.

The privacy policies are not intended to be a step by step guide to dealing with specific privacy issues you may face, but are to provide a framework for managing privacy-related matters. If you choose to use the model policies, you must ensure you have practices and procedures in place to be compliant with the policies. It is likely the implementation of these policies will require you to review and revise the manner in which you collect, use and disclose personal information about customers and employees. A review of those specific practices with legal counsel is recommended.

The model customer policy attempts to address some of the privacy issues that may arise with rebate or benefit programs offered by the suppliers and manufacturers with whom you deal. You will need to pay particular attention to your practices and procedures concerning the collection of customer information that will be disclosed to those third parties for the purpose of rebates or other benefits programs offered to customers. Under these policies and the governing privacy legislation, retailers will be required to inform customers their personal information may be collected for these purposes and disclosed to those third parties.

In Alberta and other jurisdictions with similar privacy legislation, a written privacy policy is required by statute. We hope you find these model policies helpful in ensuring compliance with your legal obligations to protect the privacy of your customers' and employees' personal information.

If you would like to hire legal counsel to deal with privacy issues in a more customized manner, you may wish to contact the author of the policies: Karl J. Bomhof, Lawson Lundell, Direct Tel: 403.781.9471, Email: kbomhof@lawsonlundell.com.

Also note that electronic copies of both policies are available in Word format by contacting the I.D.E.A. office by phone at 306-933-4904 or by email at office@independentdealers.com.

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