

**Personal Information Protection**  
**Private Sector Privacy Legislation**  
**Personal Information Protection Policy**

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**ScanAI**  
**Personal Information Protection Policy**

At ScanAI, we are committed to providing our clients, customers, members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, customers, members, protecting their personal information is one of our highest priorities.

While we always respect our clients, customers, members privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients, customers, members of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients', customers', and members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients', customers', members' personal information and allowing our clients, customers, members to request access to, and correction of, their personal information.

## Definitions

**Personal Information** – means information about an identifiable individual only including name, email address, password, and any documents that you choose to upload on the ScanAI app.

**Privacy Officer** – means the individual designated responsibility for ensuring that ScanAI complies with this policy and PIPA.

## Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the client, customer, member voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect client, customer, member information that is necessary to fulfill the following purposes:
  - To verify identity
  - To open and manage an account
  - To retrieve documents stored for the authorized user those documents belong to

## Policy 2 – Consent

- 2.1 We will obtain client, customer, member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be implied by making an account with ScanAI and the client, customer, member voluntarily provides personal information for that purpose.
- 2.3 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients, customers, members can withhold or withdraw their consent for ScanAI to use their personal information in certain ways. A client's, customer's, member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client, customer, member in making the decision.

## Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose client, customer, member personal information where necessary to fulfill the purposes identified at the time of collection:
  - To conduct client, customer, member services in the ScanAI app
- 3.2 We will not use or disclose client, customer, member personal information for any additional purpose
- 3.3 We will not sell client, customer, member lists or personal information to other parties

## **Policy 4 – Retaining Personal Information**

- 4.1 If we use client, customer, member personal information to make a decision that directly affects the client, customer, member, we will retain that personal information for at least one year so that the client, customer, member has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client, customer, member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.
- 4.3 If the application is to be discontinued, users will be notified two weeks in advance of the date of closing.

## **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that client, customer, member personal information is accurate and complete.
- 5.2 Clients, Customers, Members may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required. If the correction is not made, we will note the clients', customers', members' correction request in the file.

## **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of client, customer, member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that client, customer, member personal information is appropriately protected:
  - Use of passwords to authorize users of the ScanAI app
  - Use of Google Firebase Cloudstore database rules to protect stored information
- 6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Clients, Customers, Members Access to Personal Information**

- 7.1 Clients, Customers, Members have a right to access their personal information.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought
- 7.3 Upon request, we will also tell clients, customers, members how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client, customer, member of the cost and request further direction from the client, customer, member on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the client, customer, member in writing, providing the reasons for refusal and the recourse available to the client, customer, member.

## **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The App Developer is responsible for ensuring ScanAI's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients, Customers, Members should direct any complaints, concerns or questions regarding ScanAI's compliance in writing to aquajon14@gmail.com. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for ScanAI Privacy Officer or designated individual:

Email: [aquajon14@gmail.com](mailto:aquajon14@gmail.com)

Phone: (778)-316-4459