



MUSTEL GROUP  
MARKET RESEARCH

## Mustel Group Privacy Policies and Procedures

Mustel Group is an accredited member of the Canadian Research Insights Council (CRIC) and in full compliance with the Personal Information Protection and Electronic Documents Acts (PIPEDA). We adhere to the ethics and standards laid out in the ICC/ESOMAR International Code on Market, Opinion and Social Research and Data Analytics, and any personal information collected from respondents is protected in accordance with PIPEDA and its related regulations. Unless explicitly stated, opinions & responses provided in any of our research studies are reported in aggregate form only (meaning individual responses are combined with others) and no personal information is connected to results.

Mustel Group is committed to uphold the intent of the legislation. This means that we will abide by the following 10 key principles of fair information practices as laid out in PIPEDA.

1. **Accountable:** Mustel Group assumes full responsibility for personal information under our control. The Privacy Officer at Mustel Group guides our compliance and serves as a key contact for individuals with any questions or comments about our collection and use of personal information.
2. **Identifying purposes:** Whether surveys are conducted by telephone, the Internet or face to face Mustel Group identifies to those persons from whom we collect information, at the time it is collected, the purpose(s) for which that information will be used.

Survey results are then presented to clients in aggregate form only following removal of all personal identifiers.

3. **Consent:** individual consent to use their information for the identified purpose(s) is obtained by Mustel Group explicitly at the start of all telephone and face to face surveys and is provided implicitly by the respondent when they click past the introduction page of any web survey to self-complete.
4. **Limiting Collection:** Mustel Group will limit information collection to that which is necessary for the identified purposes of each study. In most cases the personal information collected is presented in aggregate only and not used to identify individuals. If re-contact is required explicit consent would be obtained at the time of the first contact. Further, all information will be collected by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention:** any personal information collected by Mustel Group will only be used or disclosed for the purposes for which it was collected, except with the consent of the individual or as required by the law. Further, personal information will be retained only as long as necessary for fulfillment of those purposes. In the absence of a clearly defined timeframe Mustel



Group will adhere to the standards of the Marketing Research and Intelligence Association (MRIA) requiring members to retain completed hardcopy surveys for 12 months and electronic data for 24 months. On meeting these requirements records are destroyed by confidential shredding or wiping of electronic data records.

6. **Accuracy:** Mustel Group will endeavour to ensure that the personal information we have in our possession is as accurate, complete, and up to date as necessary for the purpose(s) for which it is to be used.
7. **Safeguards:** as appropriate to the sensitivity of the information, we will employ electronic, physical and organizational safeguards to protect personal information. The physical offices are protected by 24-hour electronic security to limit physical access to our offices. Unauthorized electronic access to the network is prevented by multi-level firewalls as well as individual password protection  
  
Mustel Group ensures all employees with network access are aware of its privacy policy and procedures with regards to personal information stored on the network. Access to personal information by interviewing staff is limited to the current study in which they are working and controlled by the access limitations imposed by the survey software. Confidentiality agreements are signed by all staff that has access to personal information.

All paper documentation containing personal information is held in locked storage as long as is necessary for the purpose(s) for which it is to be used, after which it is shredded, with retired computer hard drives destroyed prior to disposal.

8. **Openness:** Upon request, Mustel Group will make readily available specific information about our policies and practices relating to the management of personal information. Requests for clarification can be made directly to the Privacy Officer.
9. **Individual access:** upon their request, Mustel Group will inform any individual of the existence, use and disclosure of his or her personal information, and will give them access to that information. Further, individuals will be able to challenge the accuracy and completeness of their personal information and to have it amended as appropriate.
10. **Challenging compliance:** individuals will be able to address challenges concerning our compliance with the above principles to our Privacy Officer.

Any questions or comments about our privacy policies and practices can be directed to the Mustel Group's Privacy Officer 604.733.4213.

