



PRIVACY POLICY

I. OVERVIEW

GCC will collect personal information about Staff for various purposes, primarily relating to establishing and managing the employment or other work relationship between GCC and its human resources. GCC shall identify the purposes for which personal information is collected at or before the time the information is collected.

GCC may also collect personal information from other sources including previous employers, work associates, personal references or other third parties to whom the Staff member has given permission to disclose the information.

II. PURPOSE

GCC has a responsibility to inform Staff of the policies and practices for the management of personal information and will make these policies and practices understandable and easily available.

III. SCOPE

Consent requirements may vary depending upon circumstances and upon the type of personal information that GCC intends to collect, use or disclose. When determining whether a Staff member's consent is required, GCC will take into account both the sensitivity of the personal information and the purposes for which GCC will use the information. If consent is required, GCC will determine the form of consent that is appropriate. Consent may be expressed, implied or deemed and may be obtained in person, by phone, by fax, by mail, e-mail, or via the Internet. Subject to our legal rights and obligations, GCC may, from time to time, seek a Staff member's consent to collect, use or disclose personal information for a new purpose.

IV. POLICY

The collection of personal information will be limited to the amount and type of information required specifically for an identified purpose. GCC shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the Staff member or if the use or disclosure is authorized by law.

Personal information collected in one business unit of GCC may be shared with other business units of GCC for the purposes as identified above. GCC may disclose personal information about its Staff for human resources and benefits administration and in the context of providing references regarding current or former employees in response to requests from prospective employers.



GCC will compile and disclose certain information about Staff to a limited number of third parties and those we are obliged to do so by law in order to administer staffing, compensation, and benefits programs.

Although GCC will protect and limit the use of personal information about Staff that is disclosed to third parties, GCC is not responsible for the subsequent uses or disclosure of the subject personal information by the third-party recipient such as government agencies.

GCC takes appropriate steps to ensure that personal information is accurate, complete and up-to-date to minimize the possibility that inaccurate personal information is used to make a decision about Staff.

GCC will provide adequate safeguard practices to ensure the security of personal information, protect the information against loss or theft and safeguard the information from unauthorized access, disclosure, copying, use or modification.

Only GCC Staff with a business need to know, or whose duties reasonably so require, are granted access to personal information about GCC Staff.

Personal information is kept as long as necessary to satisfy the purposes. Personal information that has been used to make a decision about an employee shall be retained for a reasonable period, which will permit the Staff member to access the personal information after the decision has been made.

Files containing personal information are business records and, as such, property of ABC Company. Subject to ABC Company's legal rights and obligations, GCC shall, upon receipt of a written request, inform the Staff member of the existence, use and disclosure of his or her personal information and shall, subject to reasonable limitations, permit the individual access to that information. GCC will respond to a request to access personal information within a reasonable time.

Personal information contained in business records may not be edited or removed except as follows:

- When a Staff member can demonstrate that the personal information is not accurate or complete, the information will be annotated or amended as appropriate.
- When the information is (i) personal information about a third party, (ii) sensitive or confidential business information of GCC or a third party or (iii) any other information that GCC is required or permitted by law to remove.

Staff members can seek access to their personal information by sending a written request to the Human Resources Department.

V. ENFORCEMENT



Any Staff found to have violated this policy may be subject to disciplinary action, up to and including termination.

VI. DISTRIBUTION

This policy is to be distributed to all GCC Staff.