

# PRIVACY POLICY AND PRACTICES

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A CODE FOR THE PROTECTION OF PERSONAL  
INFORMATION

December, 2006

Managed human resource solutions  
that maximize the value of people



*changing the world of work*

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**INTRODUCTION**

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Ceridian Canada Ltd.'s vision is to, "Change the world of work". One of the ways in which this can be accomplished is by ensuring the privacy of the personal information with which we are entrusted. Privacy of personal and financial information is one of the cornerstones of our business, and is one of the highest priorities within Ceridian Canada Ltd.

Ceridian Canada Ltd.'s Privacy Policy is a statement of the principles and the practices that Ceridian Canada Ltd. will follow in order to adhere to the principles laid out in the Personal Information Protection and Electronic Documents Act as well as other applicable provincial privacy legislation (the "Code"). Privacy legislation recognizes an individual's right to privacy while respecting the needs of organizations and enterprises to collect, use, and disclose information about individuals. The objective of the Code is to ensure fair, open and equitable treatment of the information entrusted to Ceridian Canada Ltd.

These objectives will be met, and this Code will be observed, by the creation of privacy standards for the various operational units within Ceridian Canada Ltd. The default standard is that Ceridian Canada Ltd. employees do not have access to personally identifiable information. In each functional area where personally identifiable data is stored or used, a standard will be jointly created by the Chief Privacy Officer and the data owner/s in each functional area to give guidance for the application of privacy for that area. Each functional area will create procedures to meet and document compliance with the requirements of their particular standard.

Ceridian Canada Ltd. is the owner of this document as approved by the executive, and has appointed a Chief Privacy Officer who is responsible for ensuring Ceridian Canada Ltd.'s compliance with its privacy obligations at law.

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**SUMMARY OF PRINCIPLES**

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**PRINCIPLE 1 - ACCOUNTABILITY**

Ceridian Canada Ltd. is responsible for the personal information held by the company and shall designate one or more persons to be accountable for the following principles.

**PRINCIPLE 2 – IDENTIFYING PURPOSES**

The purposes for which personal information is collected by Ceridian Canada Ltd. shall be identified by Ceridian Canada Ltd. when or before the information is collected. All third parties that provide personal information to Ceridian Canada Ltd. for processing shall only do so with consent or where authorized by law.

**PRINCIPLE 3 – CONSENT**

The knowledge and consent of a customer or an employee are required for the collection, use or disclosure of personal information, except where required or permitted by law.

**PRINCIPLE 4 – LIMITING COLLECTION**

The collection of personal information shall be limited to that which is necessary for the purposes identified by Ceridian Canada Ltd. Information shall be collected by fair and lawful means.

**PRINCIPLE 5 – LIMITING USE, DISCLOSURE, AND RETENTION**

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of the specified purposes, as well as legal or business purposes. Notwithstanding the foregoing, if Ceridian Canada Ltd. uses an individual's personal information to make a decision that directly affects the individual, Ceridian Canada Ltd. shall retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to the information.

**PRINCIPLE 6 – ACCURACY**

Ceridian Canada Ltd. shall take reasonable steps to ensure that the personal information that it has collected is accurate, complete, and up-to-date as is necessary for the purposes for which it was collected. Pursuant to the terms of its agreements with its customers, it remains the responsibility of Ceridian Canada Ltd.'s customers to supply Ceridian Canada Ltd. with accurate, complete and up-to-date information.

**PRINCIPLE 7 – SAFEGUARDS**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

PRINCIPLE 8 – OPENNESS

Ceridian Canada Ltd. will make specific information about its personal information management policies and practices readily available on request.

PRINCIPLE 9 – INDIVIDUAL ACCESS

Upon request, Ceridian Canada Ltd. will inform individuals of the existence, use, and disclosure of their personal information. In the case where Ceridian Canada Ltd. holds personal information as a result of a transfer for processing, the individual will be referred to the collecting organization for access. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate by the collecting organization.

PRINCIPLE 10 – CHALLENGING COMPLIANCE

Ceridian Canada Ltd. will implement procedures to receive and respond to complaints or inquiries about policies and practices relating to the handling of personal information. These procedures will be easily accessible and simple to use.

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## DEFINITIONS

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### CHIEF PRIVACY OFFICER

The Chief Privacy Officer is the person within Ceridian Canada Ltd. who is responsible for overseeing Ceridian Canada Ltd.'s compliance with the Code, including in regard to day to day operations, with respect to the collection, use and disclosure of personal information by Ceridian Canada Ltd., its employees, officers and authorized agents.

### COLLECTION

Collection refers to the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means, including but not limited to verbal collection, written collection and electronic means. When used in conjunction with the obligation to define purposes and obtain consent, collection refers solely to collection of personal information by Ceridian Canada Ltd. from the individual who is the subject of the information.

### CONSENT

Consent is voluntary agreement with what is being done or proposed. Consent can be either express or implied and may be revoked or varied subject to legal or contractual restrictions. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require inference on the part of the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual. Implied consent shall exist where an individual, not giving express consent, voluntarily provides the information to Ceridian Canada Ltd. for a particular purpose and it is reasonable or obvious that a person would voluntarily provide that information.

Implied consent for the collection and use of personal information for the purpose of starting, maintaining or terminating the employee relationship may be taken from the employee's acceptance of a position with the organization, provided that the purposes for collection and use are reasonable, that the information collected and used consists only of information related to employment, and that the employee has been provided with reasonable notice that the information will be collected for the specified purposes.

### CUSTOMER

An individual, or the individuals representing an organization, who uses, has used, or applies to use, the products or services of Ceridian Canada Ltd.

### DISCLOSURE

Disclosure refers to the act of making personal information available to others outside of Ceridian Canada Ltd.

#### E-MAIL

E-mail is deemed to be electronic communications to and from employees of Ceridian Canada Ltd. E-mail is provided to employees for the purposes of Ceridian Canada Ltd. and it is therefore not considered to be personal information for the purposes of this Code. It is noted that from time to time, business requirements may require personal information to be included as part of an e-mail and that information will be treated as per this Code.

#### EMPLOYEE

An Employee means an employee or pensioner of Ceridian Canada Ltd.

#### EMPLOYEE PERSONAL INFORMATION

Employee Personal Information means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between Ceridian Canada Ltd. and the individual employee, but does not include information that is not about an individual's employment.

#### ORGANIZATION

Organization is a term used to include associations, businesses, charitable organizations, clubs, government bodies, institutions, professional practices, and unions.

#### PERSONAL INFORMATION

Personal information is information about an identifiable individual including that of employee personal information of client's of Ceridian Canada Ltd., with the exception of business contact information. Business contact information, namely an individual's name, position or title, business telephone number, business address, business e-mail, business fax number and other similar business information, is not personal information for the purposes of this policy so long as the collection, use or disclosure of business contact information is for the purposes of contacting an individual in that individual's capacity as an employee or an official of an organization and for no other purpose.

Personal information for purposes of processing includes information such as name, address, payroll related information, human resources data, personal health information for the purposes of benefits or services, and other such information as may be required to complete the services for which Ceridian has been contracted.

#### THIRD PARTY

An individual other than the customer or his agent or an organization other than Ceridian Canada Ltd.

#### USE

Use refers to the treatment and handling of personal information within an organization.

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**PRIVACY POLICY**

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PRINCIPLE 1 – ACCOUNTABILITY

1. Ceridian Canada Ltd. is responsible for the personal information held by the company and shall designate a Chief Privacy Officer to be accountable for the following principles.
  - 1.1. Accountability for Ceridian Canada Ltd.'s compliance with the principles rests with the Director, Corporate Governance who is designated the Chief Privacy Officer for the purposes of this Code. Other persons within the company may be responsible for the day-to-day collection, processing or disposal of personal information. In addition, other individuals within the company may be delegated to act on behalf of the Chief Privacy Officer.
  - 1.2. Ceridian Canada Ltd. is responsible for personal information in its possession or under its control, including information that has been transferred to a third party for processing. Ceridian Canada Ltd. uses contractual and other means to ensure that a comparable level of protection is in place in situations where information is processed by a third party.
    - 1.2.1. Consultants, contractors, and agents associated with Ceridian Canada Ltd. are subject to and required to sign the Privacy Policy indicating their understanding and willingness to abide the policy.
  - 1.3. Ceridian Canada Ltd. has implemented policies and practices to give effect to the principles, including:
    - 1.3.1. implementing procedures to protect personal information;
    - 1.3.2. establishing procedures to receive and respond to inquiries and complaints;
    - 1.3.3. training staff and communicating to staff information about the company's policies and practices; and
    - 1.3.4. developing information to explain the company's policies and procedures
  - 1.4. Ceridian Canada Ltd. may collect a minor's personal information. In such a case if a minor is able to understand the consequences of exercising their rights the provisions of this policy shall apply. If the minor is unable to demonstrate that they understand their rights the provisions of this policy will be transferred to the minors guardian.

PRINCIPLE 2 – IDENTIFYING PURPOSES

2. The purposes for which personal information is collected by Ceridian Canada Ltd., the use to be made of the information and the categories of persons who will have access to the information shall be identified by Ceridian Canada Ltd. when or before the information is collected. Ceridian Canada Ltd. shall also inform its customers of the place where records will be kept upon request and the process for access and rectification.

Personal information that is passed to Ceridian Canada Ltd. for processing shall be deemed to have been collected as if collected by Ceridian Canada Ltd. with appropriate notification of purpose.

2.1. Ceridian Canada Ltd. collects personal data for the following purposes:

- 2.1.1. To establish and maintain ongoing relations with customers and to provide ongoing service;
- 2.1.2. To understand customer requirements;
- 2.1.3. To develop, enhance, market or provide products and services;
- 2.1.4. For the purpose of initiating, maintaining, enhancing, and terminating the employee – employer relationship;
- 2.1.5. For billing purposes;
- 2.1.6. For the purpose of resolving customer complaints;
- 2.1.7. For the purpose of maintaining data redundancy and backups;
- 2.1.8. For purposes specified by law and regulation.

2.2. Ceridian Canada Ltd. will specify the identified purposes at the time of collection from the individuals from whom the personal information is collected. Where identification at the time of collection is not possible, such identification will be made as soon as is practicable.

2.3. Personal information that has been collected by Ceridian Canada Ltd. will not be used for a purpose not previously identified without further consent, unless the new purpose is required by law.

2.4. Ceridian Canada Ltd. employees collecting personal information will be pleased to explain the purposes for which information is being collected.

### PRINCIPLE 3 – CONSENT

3. The knowledge and consent of a customer or an Employee are required for the collection, use or disclosure of personal information, except where required or permitted by law.

3.1. Ceridian Canada Ltd. assumes appropriate consent has been obtained for data transferred to Ceridian Canada Ltd. by organization(s) responsible for initiating the transfer. This includes, but is not restricted to, such organization's employee personal information or that provided on behalf of third parties. Ceridian Canada Ltd. shall advise such third party organizations of the purposes for which information will be used in order that the organization may determine whether the disclosure would be in accordance with its privacy obligations at law.

3.2. Ceridian Canada Ltd. will seek consent for the collection of personal information at or prior to the time that the information is collected.

- 3.3. Ceridian Canada Ltd. shall advise individuals of the purposes for which information will be collected and used and will state purposes in such a manner that individuals can reasonably understand how the information collected will be used or disclosed. Where practical or according to best industry practice, Ceridian Canada Ltd. shall also provide the contact information for the Chief Privacy Officer or the person designated by him or her in order to answer questions with respect to the collection of personal information.
  - 3.3.1. Ceridian Canada Ltd. may be required by Federal/Provincial legislation to disclose information to the appropriate authorities. Depending on the circumstances the individual will be notified that this possibility exists either before any personal information is disclosed, or after the disclosure has been made.
- 3.4. Ceridian Canada Ltd. will not require an individual to consent to the collection, use or disclosure of information beyond that required to meet legitimate purposes.
- 3.5. Individuals who seek to vary or withdraw consent to use personal information may do so orally or in writing. Subject to legal or contractual restrictions, Ceridian Canada Ltd. shall abide by the withdrawal or variation of consent, and shall advise the individual of the consequences of a change in the scope of consent.

#### PRINCIPLE 4 – LIMITING COLLECTION

4. The collection of personal information shall be limited to that which is necessary for the purposes identified by Ceridian Canada Ltd. Information shall be collected by fair and lawful means. The collection of personal information by Ceridian Canada Ltd. from its customers is done on a voluntary basis, no information shall be collected that is not freely disclosed to Ceridian Canada Ltd.
  - 4.1. Ceridian Canada Ltd. shall not collect data indiscriminately. Ceridian Canada Ltd. shall specify both the amount and type of information to be collected, limited to that which is necessary to fulfill the purposes identified, in accordance with Ceridian Canada Ltd.'s policies and procedures.
  - 4.2. Ceridian Canada Ltd. shall collect information by fair and lawful means, and not by misleading or deceiving individuals about the purpose for which information is collected.
  - 4.3. Ceridian Canada Ltd. may also collect personal information from other sources, with the consent of the individual or where permitted or required by law, including but not limited to credit bureaus, employers or personal references. Where Ceridian Canada Ltd. collects information from a third party source, other than for processing, the source of the information shall be recorded in the individual's record.
  - 4.4. With respect to Ceridian Canada Ltd. Employee personal information, such information may only be collected for reasonable purposes, the information must be related to employment, and Ceridian Canada Ltd. shall provide reasonable notice to its Employees that the information will be collected and the purposes for collection.
  - 4.5. Ceridian Canada, Ltd. may monitor telephone conversations for the purpose of ensuring quality and accuracy of service.

- 4.6. Resumes collected by Ceridian Canada Ltd. are considered to be the personal information of the respective applicant. No disclosures of this information will take place without the consent of the applicant.

#### PRINCIPLE 5 – LIMITING USE, DISCLOSURE, AND RETENTION

5. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information may only be used or disclosed for purposes that are reasonable. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.
  - 5.1. Ceridian Canada Ltd. will document any new purpose for using personal information and obtain, or cause to be obtained, further consent before use.
  - 5.2. Where Ceridian Canada Ltd. discloses personal information, it may do so only to the extent that is reasonable for meeting the purposes for which the information is disclosed. Third party suppliers will receive only the information necessary to fulfill the tasks for which they are contracted, and are barred from using that information for any other purpose.
  - 5.3. When required to provide information in response to a legal enquiry or order, Ceridian Canada, Ltd. will exercise reasonable caution to ensure that the order is valid and only legally required information is disclosed.
    - 5.3.1. Under certain circumstances, the law may require that Ceridian not notify individuals whose information has been requested by legal order. Where otherwise practicable Ceridian will notify individuals that their information has been subject to a legal enquiry or order.
    - 5.3.2. Personal information may be disclosed without the consent of the individual in the event of a medical emergency, or as required by legislation in cases where there is a potential threat to the individual or others
  - 5.4. With respect to Ceridian Canada Ltd. Employee personal information, such information may be used and disclosed by Ceridian Canada Ltd. only with consent or as required or permitted by law. In order to use or disclose Employee personal information, Ceridian Canada Ltd. must only use or disclose the information for purposes that are reasonable, the information must only be related to employment and Ceridian Canada Ltd. must provide reasonable notice of how the information will be used and to whom it will be disclosed in advance of any such use or disclosure.
  - 5.5. Ceridian Canada Ltd. will specify minimum and maximum retention periods for the various classes of personal data held by it. Notwithstanding the foregoing, if Ceridian Canada Ltd. uses certain personal information to make a decision that directly affects the individual, Ceridian Canada Ltd. must retain that information for at least one year after using it so that the individual has a reasonable opportunity to access it.
  - 5.6. When personal information is no longer required to fulfill an identified purpose or to fulfill a legal, professional or business requirement, it will be either physically destroyed or electronically erased in a non-recoverable manner.

PRINCIPLE 6 – ACCURACY

6. Ceridian Canada Ltd. shall keep personal information that it has collected as accurate, complete, and up-to-date as is necessary for the purposes for which it was collected. It is the responsibility of Ceridian Canada Ltd.'s customers to supply Ceridian Canada Ltd. with accurate, complete and up-to-date information.
  - 6.1. Ceridian Canada Ltd. will ensure that information is sufficiently accurate, complete, and up-to-date to meet required purposes and to minimize the possibility that inappropriate information may be used to make a decision about an individual.
  - 6.2. Ceridian Canada Ltd. will only update personal information in response to new information provided for the purposes for which the information was collected (i.e. a change in employee information supplied by an employer in the normal course of using Ceridian Canada Ltd.'s services) or in response to a verified correction by the person referred to in the information itself.
  - 6.3. Ceridian Canada Ltd. may collect information about an individual from a third party. In cases where that individual demonstrates that an error exists in that information Ceridian Canada Ltd. will provide the individual with the contact information of that third party.

PRINCIPLE 7 – SAFEGUARDS

7. Personal information shall be protected by security safeguards appropriate to the sensitivity of the information. Ceridian Canada Ltd.'s Security policies and procedures are reviewed on a regular basis and updated to maintain their relevance.
  - 7.1. Ceridian Canada Ltd. will make reasonable security arrangements to protect personal information in its custody or under its control from and against such risks as loss or theft, as well as unauthorized access, collection, use, disclosure, copying, modification, disposal, destruction or such similar risks.
  - 7.2. The methods of protection will include physical measures, organizational measures and technological measures. Ceridian Canada Ltd. will make employees aware of the importance of maintaining the confidentiality of personal information and shall educate its employees with respect to its privacy policies and practices. As a condition of employment employees are required to sign a Confidentiality agreement and are required to complete privacy awareness training upon hire.
  - 7.3. Ceridian Canada Ltd. will take care in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information.
  - 7.4. Ceridian Canada Ltd. customers are advised that they are responsible for ensuring that the appropriate controls are in place around who can access applications at their site.

PRINCIPLE 8 – OPENNESS

8. Ceridian Canada Ltd. will make specific information about its personal information management policies and practices readily available to individuals, including upon request.

- 8.1. Ceridian Canada Ltd. will be open about its policies and practices with respect to the management of personal information. Individuals will be able to acquire information about Ceridian Canada Ltd.'s policies and practices with reasonable effort and in a form that is generally understandable. Ceridian Canada Ltd. reserves the right to change its policies at its own discretion without notice. Personal information that has been collected will not be used in a manner that is materially inconsistent with existing policies without prior consent.
- 8.2. This information will include:
  - 8.2.1. The name or title, and the address, of the Chief Privacy Officer.
  - 8.2.2. How to gain access to personal information held by Ceridian Canada Ltd.
    - 8.2.2.1. Employees of clients of Ceridian Canada Ltd. will be directed to their employers for action.
    - 8.2.2.2. Employees of Ceridian Canada Ltd. will be directed to the Chief Privacy Officer for instructions.
    - 8.2.2.3. Customers of Ceridian Canada Ltd. will be directed to the Chief Privacy Officer for instructions.
  - 8.2.3. A description of the type of personal information held by Ceridian Canada Ltd., including a general account of its use.
  - 8.2.4. A copy of any brochure or other information that explain Ceridian Canada Ltd.'s policies.
  - 8.2.5. What personal information is made available to other organizations.
- 8.3 Under certain circumstances customer information may be held in a foreign jurisdiction. In these circumstances this information will be subjected to foreign legislation which may override this policy.

#### PRINCIPLE 9 – INDIVIDUAL ACCESS

9. Upon request, Ceridian Canada Ltd. will inform individuals of the existence, use, and disclosure of their personal information. In the case where Ceridian Canada Ltd. holds that information as a result of a transfer for processing, the individual will be referred to the collecting organization for access. An individual shall be able to challenge the accuracy and completeness of the information, by notifying Ceridian Canada Ltd. in writing, and to have his or her personal information amended as appropriate by Ceridian Canada Ltd.
  - 9.1. Ceridian Canada Ltd. may require sufficient information to identify the person requesting access to permit the company to provide an account of the existence, use, and disclosure of personal information. The information provided shall be used only for this purpose.
  - 9.2. Ceridian Canada Ltd. will require that an individual demonstrate that he or she is the person whose personal information is the subject of enquiry.

- 9.3. Ceridian Canada Ltd. will respond to individual requests within a reasonable time, namely no later than 30 days from receipt of the request, and at minimal or no cost to the individual. The response shall inform the individual whether or not there will be a cost associated with the request and whether access to the information will be granted, and if so, when access will be given. If access to all or part of the individual's personal information is refused, the response will set out the basis for the refusal and the name, title, business address and business telephone number of the person to contact at Ceridian Canada Ltd. to answer questions on behalf of Ceridian Canada Ltd. Where applicable, the individual shall also be advised of a review process by the applicable oversight body, for example, the Privacy Commissioner of Canada as well as the time limit to apply for any such review.

If access will not be granted due to the presence of third party or proprietary information, the information may be severed. Due to the nature of Ceridian Canada Ltd.'s business, in most cases personal information will not be severable and an individual will be informed accordingly, as soon as reasonably possible. The requested information shall be provided in a form that is generally understandable.

If Ceridian Canada Ltd. is required to provide an individual's personal information to a third party as a result of legislative requirements Ceridian Canada Ltd. will inform the individual that a disclosure has been made.

- 9.4. When an individual successfully demonstrates the inaccuracy or incompleteness of personal information collected by Ceridian Canada Ltd., Ceridian Canada Ltd. will amend the information as soon as reasonably possible. Amendment of the information includes the possibility of correction, deletion or addition of information. The amended information shall be transmitted to third parties to whom the personal information was disclosed during the year before the date the correction was made. In the event that the information cannot be amended Ceridian Canada Ltd. will note the requested correction.
- 9.5. When a challenge is not resolved to the satisfaction of the individual, Ceridian Canada Ltd. will record the substance of the unresolved challenge. When appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

#### PRINCIPLE 10 – CHALLENGING COMPLIANCE

10. Ceridian Canada Ltd. will implement procedures to receive and respond to complaints or inquiries about policies and practices relating to the handling of personal information. These procedures will be easily accessible and simple to use.
- 10.1. Ceridian Canada Ltd. will investigate all complaints. If a complaint is found to be justified, Ceridian Canada Ltd. will take appropriate measures, including, if necessary, amending its policies and practices. The complainant will be notified upon completion of the investigation as to its outcome, and if necessary, the actions taken by Ceridian Canada Ltd.
- 10.2. Inquiries or complaints about Ceridian Canada Ltd.'s personal information handling policies or practices should be directed to the Chief Privacy Office of Ceridian Canada Ltd.