

COMMUNITY VENTURES CAPITAL FUND INC.



PRIVACY STATEMENT

INTRODUCTION

Community Ventures Capital Fund Inc. (CVCF) is community-based investment fund with a Board of Directors and professional staff whose purpose is to provide growth and start-up financing to small and medium size businesses growth through debt and equity capital.

This document summarizes CVCF's privacy policies and procedures that have been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). PIPEDA sets out rules for the collection, use and disclosure of a client's or customer's personal information, as well as safeguarding that information in the course of commercial activity as defined in the legislation.

WHAT IS "PERSONAL INFORMATION"

Under PIPEDA, "Personal Information" means any information that is identifiable to an individual, including name, address, telephone number, Social Insurance Number, and date of birth. It also includes, but is not limited to, other information relating to identity, such as, nationality, gender, marital status, financial information and credit history.

PURPOSES FOR PERSONAL INFORMATION

CVCF collects only that personal information required to assess a prospective applicant's eligibility for financial assistance, as well as to report to Industry Canada, the federal department that administers the Ontario Community Futures Program.

CONSENT

At the time of completing a financing application, the express, written consent of the individual applicant will be sought for the collection, use, retention and disclosure of their personal information, if applicable, for the purposes set out in CVCF's privacy policy.

An applicant may choose not to provide some or all of the personal information requested, but if CVCF is unable to collect sufficient information to validate a financing request, the application for financing may be turned down.

ACCURACY

CVCF endeavours to ensure that all personal information in active files are accurate, current and complete. When a client notifies CVCF that his or her personal information requires correction or updating, the necessary changes will be made. Information contained in closed files is not updated.

LIMITING USE, RETENTION & DISCLOSURE

Should personal information be required, CVCF may use and retain personal information for only those purposes to which the individual has consented.

Personal information will be disclosed to only those CVCF employees, members of committees

and/or Board of Directors that need to know the information for the purposes set out in the CVCF Privacy Policy.

SAFEGUARDS

CVCF utilizes a number of physical, organizational and technological measures to safeguard personal information from unauthorized access or inadvertent disclosure in accordance with its *Information Security, Retention and Destruction Policy*, including but not limited to:

Physical

Active files are stored in locked filing cabinets located in work areas restricted to CVCF employees and authorized directors or members. Closed files are stored in locked cabinets for a period of seven years, after which, the information is shredded prior to disposal.

Organizational

CVCF employees, volunteers, and third party service providers sign confidentiality agreements binding them to safeguarding the confidentiality of personal information to which they have access.

Technological

Personal information contained on CVCF computers and the electronic database are password protected. All computers have anti-virus software and anti-spyware software installed and routinely updates. As well, the Internet server or router has firewall protection to protect against virus attacks and hacking into the database.

Electronic Transmission of Information

Notwithstanding the technological safeguards implemented by CVCF, all Internet transmissions

are susceptible to possible loss, misrouting, interception and misuse. For this reason, as part of the application that individual's sign consenting to their personal information being collected, used, retained, and disclosed, CVCF will assume that it has the individual's consent to communicate via the Internet unless notified to the contrary.

INDIVIDUAL ACCESS

An individual who wishes to review or verify what personal information is held by CVCF, may do so by making a request, in writing to the CVCF. Upon verification of the individual's identity, the CVCF will provide a written report within 90 days.

INVESTIGATING COMPLAINTS

Any concern or issue about CVCF's personal information handling practises may be made, in writing, to the Chair of the CVCF. Upon verification of the individual's identity, the Chair will act promptly to investigate the complaint and provide a written report to the individual.

If the individual is dissatisfied with the report provided by the Chair, or feels that the corrective action taken by CVCF is insufficient, the individual may direct a complaint to the Federal Privacy Commissioner in writing. The address of the Federal Privacy Commissioner is provided in this Privacy Statement for your convenience.

AMENDMENTS TO OUR PRIVACY POLICY

This Privacy Statement is a summary of CVCF's Privacy Policy. For full particulars of CVCF's privacy policies and procedures, please request a copy of the Privacy Policy from CVCF or a copy may be obtained from the Internet website at: www.communityventures.ca.

The CVCF Privacy Policy and this Privacy Statement are in effect and is retroactive to January 1, 2004. CVCF's Privacy Policy and this Privacy Statement may be updated from time to time to reflect amendments in applicable Federal and Provincial laws. Any changes to this Privacy Policy will be posted on CVCF website and will apply to personal information collected from the date of the posting of the revised Privacy Policy.

CONTACT INFORMATION

If you have any questions regarding CVCF's Privacy Policy, Information Security, Retention and Destruction Policy, and/or this Privacy Statement, or you wish to make an access to personal information request, please contact:

Attention; Chair
Community Ventures Capital Fund Inc
PO Box 1640, 595 County Road 44
Kemptville, ON, K0G 1J0
Phone: (613) 258-3919

OTHER HELPFUL PRIVACY LINKS

For a copy of *PIPEDA*, or for answers to other questions regarding privacy legislation, below are some helpful privacy links.

Federal Privacy Commissioner
www.privcom.gc.ca
112 Kent Street
Ottawa, ON K1A 1H3

Provincial Privacy Commissioner
www.privcom.on.ca

CVCF Privacy Policy Web Site:
www.communityventures.ca

Siskind, Cromarty, Ivey & Dowler LLP
Privacy Law Group:
www.siskindsprivacylaw.com