

SAMPLE ORGANIZATIONAL PRIVACY POLICY

Last Updated: [INSERT DATE]

1. Importance of your Privacy

At ABC Co., your privacy is of great importance to us. We understand that you entrust us with certain personal information in order for ABC to provide you with [insert description of ABC Co. products and services] ('ABC Co. Services'). This Privacy Policy is based on Generally Accepted Privacy Principles and ABC Co.'s commitment to implementing an effective privacy program for managing and preventing privacy risks. It applies to the ABC Co. website, mobile apps and any in-person exchange of personal information with ABC Co.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE SUBMITTING ANY INFORMATION TO ABC CO. BY VOLUNTARILY PROVIDING ANY INFORMATION TO ABC CO. AND USING OUR SERVICES, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND UNDERSTOOD THIS POLICY AND THAT YOU CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF THIS INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT PROVIDE US WITH ANY INFORMATION, AND SIMPLY EXIT THIS PAGE WITHOUT ACCESSING OR USING ANY OF OUR SERVICES.

2. Who We Are and Getting in Touch

ABC Co. is located at [insert address]. ABC Co. welcomes your comments regarding this Privacy Policy. Any requests for access to personal information and any questions or inquiries relating to privacy or data protection should be directed to our Privacy Officer at privacy@abc.com.

EU residents may also exercise their data subject rights by contacting our Privacy Officer, who is also ABC Co.'s Data Protection Officer (see Section 9 of this policy: GDPR Compliance at ABC Co.).

3. What Personal Information does ABC Co. Collect about Me?

'Personal information' is any information about an identifiable individual, being an ABC Co. customer or prospect. This Policy does not apply to an individual's business contact

information where collected, used or disclosed solely for the purpose of communicating with the individual in relation to their business, employment or profession. Also, personal information does not include anonymous or aggregate information that cannot be tracked back to you.

ABC Co. collects personal information minimally, transparently and fairly in order to effectively provide ABC Co. Services to you. In particular, we ask you to provide the following personal information: [provide the data points collected to provide products/services and include reference to data points that can be provided optionally]

In addition, when you use ABC Co.'s website or app, we automatically receive and record information on our server logs from your browser or mobile platform, including your IP address, unique device identifier, and other device information (such as your operating system version and mobile network provider). ABC Co. also automatically collects additional information from users such as [insert any automatic collections such as geolocation, data clicks within an application, etc.].

4. How is my Personal Information Used?

ABC Co. uses personal information responsibly in order to ensure we are meeting your expectations and providing you with exceptional service. Personal information is collected and used for the following specific purposes:

- a) to verify an individual's identity;
- b) to provide the products and perform the services expected by our customers;
- c) to establish relationships, understand customer needs, provide quality service to and communicate with individuals;
- d) to give us a clear picture of traffic patterns, purchasing activities and other interactions so we can continually improve ABC Co. Services;
- e) to manage and promote the business activities of ABC Co., including advertising and marketing ABC Co.'s products and services through a range of media channels;
- f) [ADD ADDITIONAL PURPOSES];
- g) to enforce this Privacy Policy and ABC Co.'s Terms of Use; and
- h) to meet legal or regulatory requirements imposed upon ABC Co. from time to time.

Note that automated data collection does not lead to profiling that significantly affects ABC Co. users, but is simply used to give ABC Co. a clear picture of its users and to provide special offers to ABC Co. users.

You can withdraw consent to the use of your personal information subject to legal or contractual restrictions and reasonable notice. You will be informed if ABC Co. will be limited or unable to provide you with information or ABC Co. Services as a result of your withdrawal of consent.

5. Who is My Personal Information Shared With?

ABC Co. only shares personal information externally with your consent (such as when you request a disclosure to your authorized agent) or as follows:

- With our directly affiliated companies such as subsidiaries or our parent company for internal audit, management or other administrative purposes;
- With service providers who directly or indirectly assist us in providing ABC Co. Services. In working with our service providers, your personal information may be transferred to a foreign jurisdiction to be processed or stored. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request, in order to comply with foreign laws;
- With our partners but only upon notice to you and the opportunity to decline; and
- In response to a subpoena, regulatory investigation or court order, or your personal information may be shared with law enforcement authorities who have demonstrated their lawful authority.

ABC Co. does not sell personal information to third parties for marketing or any other commercial purposes other than in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving the sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business, or assets, ABC Co. users will be notified before any such business transaction occurs, and be given the opportunity to deactivate or terminate their account should they so choose to. The acquiring company will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

6. How is My Personal Information Kept Secure?

ABC Co. has implemented critical physical, organizational and technical measures to guard against theft or the unauthorized or unlawful processing of the data we collect. We have also taken steps to avoid accidental loss or destruction of, or damage to, your personal information. While no system is completely secure, the measures implemented by ABC Co. significantly reduce the likelihood of a data security breach.

*** END OF SAMPLE ***

Complete sample policy is 8 pages in length. Other topics covered in this policy include:

- Data Security Controls in Place
- Cookies and Usage Tracking
- How Long is my Personal Information Retained?
- GDPR Compliance at ABC Co. *(if relevant)*
- CCPA Compliance at ABC Co. *(if relevant)*
- External Links and ABC Co. Social Media
- Changes to this Privacy Policy

Purchase complete policy (in Word format) at:

<https://privatech.ca/privacy-resources/the-privacy-documentation-suite/>