

Hybrid Document Systems Inc.  
200 Amber Street  
Markham Ontario, L3R 3J8  
Privacy@mesltd.ca  
905-475-9263  
2023-05-08

## PRIVACY IMPACT ASSESSMENT AND PIPEDA COMPLIANCE STATEMENT

At Hybrid Document Systems Inc. (HDS) we are committed to safeguarding the personal information of our clients and adhering to all relevant data protection laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA) in Canada.

This Privacy Impact Assessment (PIA) and Compliance Statement is intended to outline our commitment to PIPEDA compliance and to provide assurance that our services provided to third parties are conducted with the utmost consideration for privacy and data protection.

### Accountability:

At Hybrid Document Systems Inc., accountability is the cornerstone of our approach to personal information handling. We take our responsibility seriously, recognizing the trust placed in us by our clients and the individuals whose data we process. Our commitment to accountability is reflected in several key practices and principles:

**Designated Privacy Officer:** We have appointed a dedicated Privacy Officer who oversees and ensures our compliance with data protection laws and regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA). The Privacy Officer plays a pivotal role in monitoring and implementing our privacy policies and practices.

**Employee Training:** All our employees receive regular training on data privacy, security, and the importance of safeguarding personal information. This training ensures that every team member understands their role in maintaining data privacy.

**Privacy by Design:** We integrate privacy considerations into our operations from the outset. This includes considering privacy implications when designing systems and services to minimize risks to personal information.

**Data Protection Measures:** We maintain comprehensive data protection measures, both technical and organizational, to safeguard personal information from unauthorized access, disclosure, alteration, or destruction. Our systems and practices are designed to ensure data integrity and security.

**Data Breach Response:** We have a well-defined incident response plan in place to address potential data breaches promptly and effectively. This plan includes procedures for notifying affected parties and regulatory bodies, taking corrective actions, and preventing future incidents.

**Continuous Improvement:** We are dedicated to continuous improvement in our privacy practices. Feedback, industry best practices, and regulatory changes are considered to enhance our data protection measures and overall privacy framework.

By embracing accountability, we demonstrate our commitment to maintaining the highest standards of personal information protection. We hold ourselves responsible for ensuring that the privacy rights of individuals are upheld and respected throughout the document conversion process.

## Identifying Purposes:

At Hybrid Document Systems Inc., we are committed to transparently identifying and communicating the purposes for which personal information is collected, especially in the context of converting and indexing paper files into digital records. This transparency ensures that individuals and clients are well-informed about how their data will be utilized. Some specific purposes related to our conversion and indexing services include:

**Digital Archiving:** We collect and process personal information from paper documents to create digital archives. This enables efficient and long-term storage, ensuring that valuable historical and business records are preserved electronically.

**Document Retrieval:** Our services facilitate the quick and accurate retrieval of information from digitized records, improving operational efficiency and responsiveness to client needs.

**Search and Indexing:** We create comprehensive indexes, searchable metadata, and structured databases from paper documents. This allows for precise searching, making it easier to find specific information within large volumes of documents.

**Information Preservation:** Personal information is digitized and indexed to safeguard against loss, damage, or deterioration of paper records. This preservation is particularly critical for historical documents and sensitive client information.

**Legal and Regulatory Compliance:** We assist clients in adhering to legal and regulatory requirements by digitizing and indexing documents for record-keeping and compliance purposes. This helps organizations meet their obligations while reducing the risks associated with paper-based record-keeping.

By clearly defining these purposes, we ensure that individuals and organizations can make informed decisions about the use of their personal information. It is our commitment to

maintain the highest standards of privacy and data protection throughout the process of converting and indexing paper files into digital records.

## Consent:

At Hybrid Document Systems Inc., we uphold the principle of informed consent when collecting and processing personal information. It's essential to note that our services primarily involve providing scanning and indexing solutions to other organizations rather than individuals. These organizations entrust us with their client data for various purposes, such as document management and archival services. While we primarily obtain consent from our corporate clients, we are committed to ensuring that individuals' rights and privacy are respected.

Our process for obtaining consent in this context includes the following:

**Corporate Client Consent:** We seek the consent of the organizations we serve. This consent covers the collection, processing, and storage of personal information as it relates to their client data. These organizations are responsible for obtaining any necessary consents from their clients whose data they share with us.

**Informed Consent:** We work closely with our corporate clients to ensure that they fully understand the scope and purpose of our services. This includes explaining how we will handle the personal information provided to us.

**Client Data Protection:** our corporate clients are required to have their own privacy policies and practices in place to protect the privacy and rights of their clients. We collaborate with them to ensure that the collection and sharing of data comply with all relevant privacy laws and regulations.

**Withdrawal of Consent:** Corporate clients can withdraw their consent at any time, and we respect their decision by ceasing further data processing. In such cases, our corporate clients are responsible for notifying their clients, if necessary, and managing any required data changes.

We acknowledge the importance of individuals' privacy, even when our services are primarily directed toward organizations. As part of our commitment to PIPEDA compliance, we encourage our corporate clients to adopt privacy-conscious practices and maintain the trust of their clients.

## Limiting Collection:

At Hybrid Document Systems Inc., we recognize that our collection of personal information is generally transitory and tied to the process of converting physical records to digital information. We are committed to collecting only the information that is necessary for this specific purpose. It is important to note that our goal is to digitize records, and once this conversion is complete, we take significant steps to ensure that personal information is promptly and securely removed from our systems.

Our approach to limiting collection includes the following principles:

**Necessity:** We collect personal information only to the extent required for the conversion and indexing process. This ensures that we do not gather data that goes beyond the specific purpose of creating digital records.

**Transitory Nature:** We acknowledge that personal information collected in the course of digitization is generally of a temporary nature. Once the conversion process is completed and verified, we do not retain personal information unless explicitly required by our corporate clients for their own legal, regulatory, or operational purposes.

**Secure Removal:** We have established secure processes for the removal of personal information from our systems. This step is taken seriously to safeguard individuals' privacy and to ensure that no traces of personal data are left in our digital archives.

**Data Minimization:** We have stringent data minimization practices in place, which means that we only collect the specific personal information that is directly related to the records being converted. Unnecessary data is never gathered or stored.

By focusing on the transitory nature of our data collection and the secure removal of personal information from our systems, we aim to protect the privacy of individuals whose data is involved in the digitization process. Our commitment to data minimization ensures that we remain focused on the task at hand without unnecessarily retaining personal information.

## Limiting Use, Disclosure, and Retention:

At Hybrid Document Systems Inc., we understand that the collection and handling of personal information are exclusively undertaken to facilitate the document conversion process. We are steadfast in our commitment to never disclose this personal information to third parties. Our focus is on ensuring that personal information is used solely for its intended purpose, which is the conversion of physical records into digital formats.

Our approach to limiting use, disclosure, and retention is underscored by the following principles:

**Specific Purpose:** Personal information is gathered and processed exclusively for the purpose of document conversion, such as creating digital records and archives. We do not engage in the use of this information for any other unrelated purposes.

**Non-Disclosure:** We never disclose personal information to third parties. It remains within our secure systems and is accessed only by our authorized personnel who are involved in the conversion and indexing process.

**Data Retention:** We retain personal information only for the duration required to complete the document conversion process. Once this process is successfully finished and verified, we take immediate steps to securely dispose of the personal information. Our retention practices are designed to ensure that data is retained no longer than necessary.

By adhering to these principles, we aim to protect the privacy of individuals whose data is involved in the digitization process. We recognize the sensitivity of this information and ensure that it is treated with the utmost care and discretion.

## Accuracy:

At Hybrid Document Systems Inc., we place a significant emphasis on maintaining the accuracy of the information we collect during the document conversion process. It's important to note that the accuracy of the data we handle can only be compared to the accuracy of the information contained within the paper records we are converting for our clients. We do not independently verify or cross-check personal information with the individuals themselves.

Our approach to ensuring accuracy includes the following considerations:

**Data Integrity:** We take every precaution to preserve the integrity of the data as it is transferred from paper records to digital formats. Our focus is on accurately transcribing the information within the source documents.

**Source Accuracy:** The accuracy of the data we digitize is inherently tied to the accuracy of the original paper records. Our responsibility is to faithfully represent the information as it is found within those records.

**No Independent Verification:** We do not independently contact or verify personal information with the individuals mentioned in the records. Our role is to accurately capture and reproduce the information contained within the paper documents.

**Notification:** If discrepancies or inaccuracies are identified during the conversion process, we work closely with our corporate clients to ensure that these discrepancies are addressed and corrected as necessary on their end.

By adopting this approach, we prioritize the accurate representation of the data within the documents we convert while respecting the boundaries of our role in the conversion process.

## Safeguards:

At Hybrid Document Systems Inc., we recognize the paramount importance of safeguarding personal information during the document conversion process. We have implemented a comprehensive range of safeguards to ensure the confidentiality, integrity, and security of the data we handle. Our commitment to data security is underpinned by the following protective measures:

**Physical Security:** Our facilities are equipped with strict physical security measures, including controlled access, surveillance, and environmental controls, to prevent unauthorized access, theft, or damage to physical records and digitized data.

**Digital Security:** The digital data we create and store is encrypted to protect it from unauthorized access. We employ robust encryption protocols to ensure that data remains confidential and secure during storage and transmission.

**Access Controls:** We implement role-based access controls to limit data access to authorized personnel only. Access permissions are granted on a need-to-know basis, and user activity is closely monitored to detect and prevent any unauthorized access or data breaches.

**Secure Transmission:** When transmitting data to our clients or within our systems, we employ secure channels and encryption methods to safeguard data against interception or tampering.

**Data Backups:** Regular data backups are conducted to ensure data integrity and availability. In the event of unforeseen data loss, we can promptly recover information without compromising its accuracy or security.

**Employee Training:** Our staff undergo thorough training on data security best practices. They are educated on the importance of safeguarding personal information and are well-versed in recognizing and mitigating potential security risks.

**Privacy Policies:** We maintain clear and comprehensive privacy policies and procedures that govern the handling of personal information. These policies are updated to reflect evolving security and privacy standards.

**Incident Response Plan:** We have a well-defined incident response plan in place to address and mitigate data security incidents promptly. This plan includes procedures for notifying affected parties, regulatory bodies, and clients, should an incident occur.

By implementing these safeguards, we strive to create a secure environment for the conversion and handling of personal information. Our goal is to ensure that individuals' privacy rights are upheld and that our corporate clients can have the utmost confidence in the protection of the data they entrust to us.

## Openness:

At Hybrid Document Systems Inc., we are dedicated to promoting a culture of openness and transparency regarding our privacy practices. We firmly believe that individuals and organizations have the right to understand how we collect, use, and protect personal information. Our commitment to openness is demonstrated through various means:

**Privacy Policies:** We maintain and update clear, concise, and easily accessible privacy policies that detail how we handle personal information. These policies provide comprehensive information about the purposes of data collection, our security measures, and our commitment to complying with relevant privacy laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA).

**Transparency in Services:** We engage with our corporate clients to ensure they have a thorough understanding of our services. We work collaboratively with them to establish data handling processes that align with their privacy and regulatory requirements.

**Education and Awareness:** We are dedicated to fostering awareness and understanding of privacy issues among our staff and clients. This includes providing guidance on best practices, and the importance of data security.

**Privacy Inquiries:** We encourage individuals and clients to reach out to our designated Privacy Officer for inquiries or clarifications about our privacy practices. Our Privacy Officer serves as a resource to address questions, concerns, or requests related to personal information.

By promoting openness and transparency, we aim to empower individuals and corporate clients with the knowledge they need to make informed decisions regarding their personal information. We view transparency as an essential component of building and maintaining trust in our services.



## Individual Access:

At Hybrid Document Systems Inc., we want to ensure that individuals' privacy rights are respected, even though we do not generally engage directly with the individuals whose information we are converting for our clients. We do, however, acknowledge the importance of providing a channel for individuals to exercise their rights under privacy laws, including the right to request access, correction, or withdrawal of consent concerning their personal information.

Here's how we facilitate individual access:

**Access Requests:** Individuals have the right to request access to the personal information we hold about them. To make this process as straightforward as possible, we encourage individuals to contact our corporate clients, who are responsible for managing access requests. We work collaboratively with our clients to ensure that access requests are handled efficiently and in compliance with applicable privacy laws.

**Correction Requests:** Should an individual identify inaccuracies or errors in their personal information, they can request corrections through our corporate clients. We maintain a cooperative process to ensure that any necessary amendments are made promptly.

**Withdrawal of Consent:** If an individual wishes to withdraw their consent for the collection and processing of their personal information, they can communicate this decision to our corporate clients. Upon receiving such instructions, we cease further data processing, as we are committed to respecting the choices made by individuals.

While we do not generally interact directly with the individuals, we appreciate the significance of their privacy rights. Our collaborative approach with our corporate clients allows us to facilitate access, correction, and consent withdrawal requests effectively.

If you are an individual seeking to exercise your privacy rights or have any related inquiries, please reach out to the relevant corporate client with whom you have a relationship. They will coordinate with us to address your request or question. Additionally, our Privacy Officer is available to provide guidance to our corporate clients in managing these requests and inquiries

## Challenging Compliance:

At Hybrid Document Systems Inc., we understand the importance of addressing privacy concerns and compliance challenges, even though we do not generally engage directly with the individuals whose information we are converting for our clients. We are committed to ensuring that individuals' rights are upheld, and we provide a structured process to manage and resolve any concerns or inquiries.

Here's how we approach challenging compliance while recognizing the context of our business:

**Inquiries and Concerns:** We acknowledge that individuals may have inquiries or concerns regarding the handling of their personal information during the document conversion process. We invite individuals to reach out to our corporate clients, who are responsible for managing these inquiries and concerns on behalf of their clients.

**Cooperation with Corporate Clients:** We work closely with our corporate clients to ensure that any privacy-related inquiries or challenges are promptly addressed. Our commitment to privacy and data protection extends to collaborating with our clients to resolve these issues.

**Privacy Officer's Role:** Our designated Privacy Officer is available as a resource to assist our corporate clients in managing and resolving compliance concerns. The Privacy Officer's role includes investigating and facilitating fair and transparent resolution processes.

Our commitment to challenging compliance ensures that individuals' rights are respected and upheld, even though we do not have direct interactions with them. We view these challenges as opportunities to reinforce our dedication to data privacy and protection.

If you are an individual with inquiries or concerns related to your personal information handled during the document conversion process, please contact the relevant corporate client with whom you have a relationship. They will coordinate with us to address your concerns or inquiries. Additionally, our Privacy Officer is available to provide support and guidance to our corporate clients in managing compliance issues.

Hybrid Document Systems Inc. is committed to continuous improvement in our privacy practices and our compliance with PIPEDA. We regularly review and update our privacy policies and procedures to ensure that personal information is protected and handled with the highest standards of care.

If you have any questions or concerns about our PIPEDA compliance or our scanning and indexing services, please do not hesitate to contact our Privacy Officer at [privacy@mesltd.ca](mailto:privacy@mesltd.ca)

Sincerely,



Andrew D'Arcy  
Chief Operating Officer / Privacy Officer  
Hybrid Document Systems Inc.

[privacy@mesltd.ca](mailto:privacy@mesltd.ca)

[adarcy@mesltd.ca](mailto:adarcy@mesltd.ca)

Office: 905-476-9263

Direct: 905-475-9264

Cell: 416-697-8689