PRIVACY POLICY & CONFIDENTIALITY STATEMENT

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Connecting Commerce to Community

Effective Date: October 29, 2026
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Business Name: Travis Richards Office (TROSocial)
Owner/Broker: Travis Richards, M. Comm (Honours)
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1. PURPOSE & COMMITMENT TO PRIVACY

Travis Richards Office (TROSocial) is committed to protecting the privacy, confidentiality, integrity, and security of personal and business information entrusted to our office.

As a locally owned and operated business brokerage, marketing communications, and community administration firm serving the Madawaska Valley and surrounding communities, we recognize that confidentiality, professionalism, accountability, and public trust are fundamental to our operations.

Travis Richards Office operates in accordance with the principles and applicable requirements of Canada's **Personal Information Protection and Electronic Documents Act (PIPEDA)**.

Our commitment extends to every individual, business, organization, and community member who accesses our services, including seniors, students, persons with disabilities, and individuals requiring accessible public office services.

We are committed to collecting only the information necessary to provide services, safeguarding confidential materials, limiting unauthorized disclosure, and respecting the privacy rights of every client.

2. SCOPE OF THIS POLICY

This Privacy Policy applies to the collection, use, disclosure, processing, storage, retention, and disposal of personal information handled by Travis Richards Office.

It applies to the following professional services:

- Business brokerage and marketing leadership
- Social media management and marketing communications
- Community and network integration
- Reputation management
- Community administration and public office services
- Electronic fax transmission and receipt
- Black-and-white printing and copying
- Document scanning and digital administration
- Client correspondence, billing, and office administration
- Website inquiries and electronic communications

This policy applies to information handled in physical, electronic, verbal, and written formats.

3. ACCOUNTABILITY & PRIVACY OFFICER

Travis Richards Office is accountable for personal information under its control, including information transferred to third-party service providers for processing.

The Owner/Broker, Travis Richards, serves as the designated Privacy Officer and is responsible for overseeing the office's privacy practices.

Responsibilities include:

- Maintaining and reviewing privacy procedures
- Addressing privacy inquiries and complaints
- Overseeing appropriate safeguards for confidential information
- Reviewing suspected privacy incidents
- Ensuring appropriate information retention and disposal practices
- Supporting compliance with applicable privacy legislation
- Reviewing third-party information-handling arrangements

Privacy concerns may be submitted directly to the Privacy Officer using the contact information provided at the end of this policy.

4. PERSONAL INFORMATION WE COLLECT

Depending on the nature of the services requested, Travis Richards Office may collect or receive:

- Client names and contact information
- Mailing addresses, telephone numbers, and email addresses
- Business names and organizational information
- Billing, invoicing, and transaction information
- Business brokerage and commercial records
- Marketing and social media account information
- Documents provided for printing, copying, scanning, or faxing

- Information contained in client correspondence
- Electronic fax transmission records
- Other information reasonably required to provide authorized services

Documents provided to our office may contain confidential or sensitive information, including financial, employment, legal, medical, or disability-related records.

Our office does not require clients to disclose the contents of confidential documents unless such disclosure is reasonably necessary to complete the requested service.

5. PURPOSES FOR COLLECTION & USE

Travis Richards Office collects, uses, and discloses personal information only for identified and legitimate business purposes.

These purposes may include:

1. Providing requested professional or public office services.
2. Processing, transmitting, printing, copying, or scanning documents.
3. Communicating with clients regarding service requests.
4. Maintaining invoices, financial records, and business administration.
5. Verifying electronic fax transmission results.
6. Meeting applicable legal and regulatory obligations.
7. Protecting the security and integrity of office operations.
8. Responding to authorized inquiries, complaints, or service concerns.
9. Managing authorized business brokerage, marketing, or communications activities.

Information will not be used for unrelated purposes without appropriate consent or another lawful basis.

6. CLIENT CONSENT

Travis Richards Office obtains meaningful consent for the collection, use, and disclosure of personal information where required by law.

Consent may be express or implied, depending on the sensitivity of the information and the circumstances of the service.

By voluntarily submitting documents for printing, copying, scanning, or fax transmission, clients authorize our office to process the materials for the requested service.

This authorization does not permit unrelated use, distribution, or disclosure of confidential information.

Clients may withdraw consent, subject to applicable legal or contractual restrictions and reasonable notice.

Withdrawal of consent may affect our ability to complete certain services.

7. ELECTRONIC FAX SERVICES & CONFIDENTIALITY

Travis Richards Office provides electronic fax services to individuals, businesses, healthcare-related organizations, community agencies, and members of the public.

We recognize that fax communications may contain highly sensitive and confidential information.

Our office is committed to handling fax communications responsibly and in accordance with applicable privacy requirements.

7.1 Confidential Handling

- Fax documents are processed only for their authorized purpose.
- Documents are not intentionally disclosed to unauthorized individuals.

- Access is limited to authorized service-related activities.
- Confidential information is not used for unrelated personal or commercial purposes.
- Incoming and outgoing transmissions are handled with appropriate discretion.
- Misaddressed documents are treated as confidential and are not knowingly disclosed further without authorization or lawful justification.

7.2 Electronic Fax Retention — 365 Days

Our electronic fax service provider maintains electronic copies of fax documents for **365 days from the date of transmission**.

This retention period applies to documents processed through the electronic fax platform.

Clients should understand that fax documents may remain within the provider's electronic system after the immediate service has been completed.

The retention period does not mean that documents will be routinely reviewed or accessed by Travis Richards Office.

Access to retained information is limited to authorized business, administrative, technical, or legally required purposes.

7.3 Detailed Transmission Logs

Our electronic fax service maintains detailed transmission logs.

These records may include:

- Transmission date and time
- Sending and receiving fax numbers
- Transmission status
- Delivery confirmation or failure information

- Other technical details associated with the transmission

Transmission logs support service verification, troubleshooting, operational accountability, and appropriate record management.

The retention period for transmission logs may differ from the 365-day document-retention period, depending on the provider's policies and applicable requirements.

7.4 Fax Transmission Risks

Although reasonable safeguards are used, electronic fax communications are not completely free from security risks.

Potential risks include incorrect destination numbers, unauthorized access, technical failures, and risks associated with third-party communication networks.

Clients are responsible for confirming the accuracy of recipient fax numbers and ensuring that they are authorized to transmit the documents.

Travis Richards Office will take reasonable steps to address transmission errors or suspected privacy incidents brought to its attention.

8. PRINTING, COPYING & SCANNING SERVICES

Travis Richards Office provides black-and-white, single-sided, letter-size printing, copying, and scanning services.

Our printing and scanning equipment does not retain or store copies of client documents following processing.

Documents are processed solely for the services requested by the client.

Our office does not intentionally create or maintain permanent duplicate copies of printing, copying, or scanning jobs unless separately authorized or required by law.

Any temporary electronic files received or created outside the printing and scanning equipment will be handled in accordance with this policy and securely disposed of when no longer required.

Physical originals and completed documents will be handled with reasonable care and confidentiality.

Clients are responsible for ensuring they have the necessary authorization to reproduce, scan, or distribute submitted materials.

9. PERSONAL HEALTH INFORMATION & SENSITIVE RECORDS

Travis Richards Office recognizes that some clients may submit documents containing personal health information, medical records, financial information, disability-related documentation, or other sensitive materials.

Such documents are treated with heightened confidentiality.

The office is committed to observing applicable requirements under PIPEDA and, where relevant to a particular service arrangement, Ontario's **Personal Health Information Protection Act, 2004 (PHIPA)**.

Providing public fax, printing, copying, or scanning services does not automatically make Travis Richards Office a health information custodian under PHIPA.

However, additional legal obligations may apply depending on the office's role, contractual arrangements, and the information being processed.

Sensitive information will not be intentionally accessed, reviewed, retained, or disclosed beyond what is reasonably necessary for an authorized service or lawful obligation.

10. BUSINESS BROKERAGE & COMMERCIAL CONFIDENTIALITY

Travis Richards Office recognizes the importance of protecting confidential business and commercial information.

Business brokerage and related consulting services may involve:

- Business valuations and financial statements

- Ownership and corporate records
- Confidential negotiations
- Commercial agreements and transaction documents
- Business strategies and client lists
- Proprietary or commercially sensitive information

Such information will be used only for authorized professional purposes and disclosed only with appropriate authorization or as required or permitted by law.

Where appropriate, confidentiality agreements and other contractual safeguards may be used.

11. SOCIAL MEDIA MANAGEMENT & MARKETING COMMUNICATIONS

When providing social media management, marketing, or communications services, Travis Richards Office may receive access to client accounts, business information, unpublished content, and administrative credentials.

Access will be used only within the scope of the client's authorization and agreed services.

Our office will take reasonable measures to safeguard credentials and confidential account information.

Information published or processed through third-party social media platforms is also subject to the privacy practices and terms of those platforms.

Travis Richards Office does not sell client personal information to advertisers or unrelated third parties.

12. INFORMATION SECURITY & SAFEGUARDS

Travis Richards Office is committed to maintaining reasonable administrative, physical, and technical safeguards appropriate to the sensitivity of information under its control.

These may include:

- Password-protected devices and accounts
- Appropriate access restrictions
- Confidential handling of physical records
- Secure disposal of documents
- Controlled access to electronic fax records
- Appropriate management of third-party services
- Security-conscious communication practices
- Review of suspected unauthorized access or disclosure

Security measures are reviewed as operational needs and risks change.

No electronic transmission method or information storage system can be guaranteed to be entirely risk-free.

13. INFORMATION RETENTION & SECURE DISPOSAL

Travis Richards Office follows information retention practices based on service requirements, operational necessity, and applicable legal obligations.

13.1 Electronic Fax Documents

Electronic fax documents are retained by our e-fax service provider for **365 days from the date of transmission**.

13.2 Fax Transmission Logs

Detailed fax transmission logs are maintained by the electronic fax service provider for operational, verification, and administrative purposes.

Their retention period is governed by the provider's applicable arrangements and any relevant legal requirements.

13.3 Printing & Scanning

Our printing and scanning equipment does not retain copies of client documents after processing.

Any separate temporary files created during service delivery are subject to appropriate deletion procedures once no longer required.

13.4 Business Records

Invoices, contracts, financial records, and client administration records may be retained for periods required by applicable legislation or legitimate business needs.

13.5 Secure Disposal

When information is no longer required, reasonable measures will be taken to ensure secure deletion, destruction, or anonymization, as appropriate.

14. THIRD-PARTY SERVICE PROVIDERS

Travis Richards Office may use third-party providers for electronic faxing, telecommunications, website hosting, cloud-based applications, payment processing, and business software.

Where personal information is processed by a third party on our behalf, reasonable steps will be taken to ensure appropriate privacy and security protections are in place.

Some third-party providers may process or store information outside Ontario or Canada.

Information processed in other jurisdictions may be subject to the laws of those jurisdictions.

Travis Richards Office remains accountable for personal information under its control, subject to applicable law.

15. ACCESS TO PERSONAL INFORMATION & CORRECTIONS

Individuals may request access to personal information held about them by Travis Richards Office, subject to applicable legal exceptions.

Individuals may also request correction of inaccurate or incomplete personal information.

Requests must be directed to the Privacy Officer.

Identity verification may be required before personal information is released.

Requests will be addressed within applicable statutory timeframes.

16. PRIVACY INCIDENTS & DATA BREACHES

Travis Richards Office takes suspected privacy incidents seriously.

In the event of unauthorized access, loss, disclosure, or another suspected privacy breach, the office will take reasonable steps to:

1. Assess the nature and scope of the incident.
2. Contain the incident and reduce potential harm.
3. Determine whether personal information was affected.
4. Evaluate applicable notification and reporting obligations.
5. Notify affected individuals and the Office of the Privacy Commissioner of Canada where legally required.
6. Maintain records of breaches as required by PIPEDA.
7. Implement reasonable corrective measures.

17. CLIENT RESPONSIBILITIES

Clients accessing Travis Richards Office services are responsible for:

- Providing accurate contact and recipient information
- Confirming fax numbers before transmission
- Ensuring authorization to submit or reproduce documents
- Advising our office of special confidentiality requirements
- Retrieving original and completed documents when applicable
- Protecting confidential materials in their own possession

Travis Richards Office may decline services that violate applicable law or present unreasonable security, privacy, or operational risks.

18. WEBSITE & ELECTRONIC COMMUNICATIONS

Information voluntarily submitted through www.trosocial.ca or by email may be used to respond to inquiries, provide requested services, and conduct legitimate business administration.

Our website may use third-party hosting, cookies, or analytics technologies, depending on its configuration.

Where applicable, additional notices and consent mechanisms will be provided as required by law.

Email and other electronic communications may involve security risks. Clients are encouraged to consider the sensitivity of information before transmitting it electronically.

19. PRIVACY COMPLAINTS & RESOLUTION

Travis Richards Office is committed to addressing privacy concerns respectfully, professionally, and in a timely manner.

Individuals who believe their personal information has been improperly collected, used, disclosed, retained, or otherwise handled may submit a complaint to the Privacy Officer.

Complaints will be reviewed, and appropriate corrective action will be taken where warranted.

Individuals may also contact the **Office of the Privacy Commissioner of Canada** concerning matters within its jurisdiction.

Website: www.priv.gc.ca

20. POLICY REVIEW & AMENDMENTS

This policy may be updated to reflect changes in:

- Applicable privacy legislation
- Business services and operating procedures
- Electronic fax technology and retention arrangements
- Information security practices
- Third-party service providers
- Regulatory or professional obligations

The current policy will be available through Travis Richards Office or its official website.

Where legally required, material changes to information-handling practices will be communicated to affected individuals.

21. CONTACT INFORMATION — PRIVACY OFFICER

Travis Richards, M. Comm (Honours)
Owner/Broker & Privacy Officer
Travis Richards Office (TROSocial)

TRAVIS RICHARDS OFFICE
Business Brokerage
CONNECTING COMMERCE & COMMUNITY

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Email: travis@trosocial.ca
Website: www.trosocial.ca

Office Hours: Monday–Friday, 9:00 AM–5:00 PM
Closed daily from 12:00 PM–1:00 PM

OUR COMMITMENT

At Travis Richards Office, protecting confidential information is an essential part of providing professional, accessible, and trustworthy services.

Whether serving a business owner, community organization, senior, student, person with a disability, or member of the public, our office is committed to treating personal information with care, discretion, dignity, and respect.

We believe strong communities are built upon trust, accountability, and responsible professional relationships.

Your Information. Your Privacy. Our Responsibility.

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