

PRIVACY POLICY

This policy is based on the requirements and standards of the Personal Information Protection and Electronic Documents Act (PIPEDA), and the legislation to protect consumers from unwanted, commonly known as "Spams" .

This policy is implemented according to the following principles:

1. **Accountability**

All files and information held by MDRA are the property of the Minister of Transport (the Minister), under whose direction the activities of MDRA are managed.

2. **Purpose of information collection**

MDRA will collect only that information which is required to administer the following:

- Financial transactions.
- Inspection records for each aircraft.
- Information obtained from delegates which are essential to the maintenance of their currency, training, and re-training requirements under direction from the Minister.

This information includes but is not necessarily limited to the following:

- Names, addresses e-mail addresses and telephone numbers of builders, importers, and delegates.
- Names, addresses and telephone numbers of co-builders and partners in domestically built projects and importations.
- Details of builders' transactions with kit and material suppliers to establish the eligibility of projects to be considered as Major Portion eligible and to establish if projects are of a complex design and therefore subject to fee surcharge. MDRA may also contact the supplier(s) to confirm any information supplied by our customers.
- Details of delegates' employment history, and job related training for the purpose of selection for recommendation to the Minister as a prospective candidate for training.
- Credit Card information needed to enable payment of fees.

3. **Consent**

All customers, whether building or importing an aircraft, are required to fill out a Letter of Intent for each new import or build project. This letter requests only the information required by regulation and necessary to administer the file and the inspection process. It also includes an advisory to the customer that personal information is being collected and for what purpose. This advisory further informs them that their signature on the form indicates acceptance of the terms and conditions of this policy.

4. **Anti-Spam Legislation**

In order to keep costs down, MDRA will use email as much as possible. We will request your permission to keep your email address on file and will use that address only for the purposes listed in Section 2, above. We do not share customer information with any other organization, except as explained in Section 5, below.

5. **Limitations on disclosure and retention**

Information collected is not disclosed to any person other than an MDRA appointed Peer Reviewer or a delegate assigned to inspect a customer's aircraft.

Note: MDRA will not discuss the details of any project or import file with agents, builder assistance personnel, or any person not named as a builder or importer of record on the letter of intent filed for any project. Neither will we accept requests or direction from, or send inspection packages to, or in care of, anyone other than a builder or importer of record.

Exceptions:

- After consultation between the MDRA General Manager and the Transport Canada (TC) Headquarters Advisor responsible for administration of the program, information may be released as follows:
- Upon request from a Transport Canada Civil Aviation Safety Inspector.
- Upon request from a representative of the Canadian Transport Accident Investigation and Safety Board (CTAISB).
- Upon request of Municipal, Provincial, or Federal Police authority.
- Upon receipt of a legal requirement such as a court order, or subpoena.
- To a person who can provide justification acceptable to MDRA and TC.

Retention:

Information is retained as follows:

- Active projects are those which have a letter of intent filed and have had an inspection within the last 3 years.
- Inactive projects are those with records of inspections having been completed, but not within the last 3 years. These will be archived for individual consideration, and possible destruction.
- Project abandoned - If there is no record of inspection for the project, and it has not seen any activity for 3 years, the builder of record will be contacted and status decided as required. If the builder of record is not available using the contact information supplied in the file, it will be destroyed.
- Retention by delegates- Delegates are not permitted to retain files after an inspection is completed and the pertinent documents are forwarded to the MDRA office or to the responsible Transport Canada office as required. They may keep a copy of inspection reports performed by them for training record purposes.
- Custody during inspections- During the time a delegate has a project file in his possession; he will keep the information confidential, keep it in a safe location, and will not permit access by unauthorized persons.
- After completion of the final or Import inspection and upon release of the Special Certificate of Airworthiness, Amateur Built, the office copy of the file is quarantined and destroyed by a commercial shredding company which supplies a certificate of destruction. Office staff keeps a permanent record of destruction of files.
- Digital Retention / Transmission- MDRA retains information on each project as a permanent record on computer hard drives. This consists only of the basics of customer information and details of the aircraft and inspections performed. Personal information cannot be separated from project data. Credit card numbers are not retained in digital form in the MDRA office. Records of financial transactions are kept for accounting and taxation purposes only. Credit card transactions are performed on an internet site which provides industry standard security.

6. Accuracy

All staff is trained to record information accurately. If a customer informs us of a needed change or correction, it is done as soon as possible. On each new contact with a customer, we will confirm the information on file. Any information transmitted to delegates is sent in the form of original documents or copies thereof, so transcription errors are not introduced. Sensitive information such as credit card numbers is purged from documents which leave the office.

7. Safeguards

Files are retained in locked cabinets and/or in a locked file storage area when the office is closed. We prefer to receive sensitive information such as credit card numbers directly by telephone contact, but facsimile, mail, and electronic mail are used if the customer so requests. Credit card transactions, email and internet access are enabled on sites and servers by ISPs which provide industry standard security.

Office computers are protected against virus infection, spam, phishing and other such attacks by dedicated software which is firewalled, and kept up to date, and scans are regularly performed by the office staff. Staff is also trained in standard digital awareness techniques to help prevent any attempts to compromise information. Wireless links are not used.

8. Access to information and customer service.

This policy is published on our web site and a copy is available from the MDRA office to anyone on request. Information held by MDRA is not subject to the Access to Information Act.

9. Complaints and enquiries

If you have a question about this policy or believe your information is not being correctly handled, please contact us to explain your concerns. We will do what we can to resolve the situation in the office. If that is not possible, we will refer it to the General Manager for further resolution.

10. Contact Information

The office is located at 2469 Aviation Lane, London, Ontario N5V 3Z9

Telephone is 519-457-2909; toll free (in Canada only) 877-419-2111.

Facsimile is 519-457-0980 or 877-800-6362 (in Canada only)

Email is md-ra@md-ra.com

MDRA London, Ontario

This 24th day of June, 2014