

First email from Stu Haskins, Vice President and General Manager, Dueck Auto Group

We are receipt of your e mail requesting information on our policy as it pertains to capturing drivers licence information:

The following will detail our policy on this issue.

1) Under PIPEDA, a service provider can require someone who wants to enter into a service agreement to provide identifying personal information on the basis that it is necessary to provide a service where the business is trying to protect itself from loss due to fraud by requiring customers to identify themselves. In fact Assistant Privacy Commissioner Black ruled that a collection of identifying information was necessary and appropriate to combat theft and to protect the financial interest of the organization and others.

2) It is reasonable that we copy a prospective customer's drivers licence and have he or she acknowledge the attached "Dueck Demonstration Acknowledgement Form" before driving one of our vehicles. In this form they may also acknowledges that we can use their name and address for future contact purposes and that their scanned drivers licence will be auto deleted from our records within thirty days. This not only protects us financially from fraudulent activity but also protects the wellbeing of our employees in case someone attempts to steal our vehicle during a test drive.

3) Once the customer has completed the test drive, within a reasonable time, (maximum 30 days) the customers scanned or photocopied drivers licence will be eliminated from the CRM system or destroyed. What is retained, if agreed to by the customer is name, address, email, and mailing address.

4) In all cases, the customer understands and acknowledges that we require a copy of their drivers licence prior to test driving our vehicle.

5) We are in the process of moving to a new CRM system "Dealmine" that will capture a potential client's drivers licence. In this case the customer will continue to still sign the attached acknowledgement form. As stated before, the scanned copy of the customers drivers licence will be eliminated from our system within 30 days.

6) Finally we have asked the president of the B.C. Dealer Association, Blair Qualey, to review this process with the Privacy Commissioner to insure all dealers fall within the guidelines of the Privacy Act.

7) Please be assured all customer information is secure.

8) We believe we have taken the necessary steps required to protect the company while keeping the customer fully informed about what information we will require and the length of time we will keep it prior to test driving our cars.

Please call if you require any further information.

Yours truly,

Stu Haskins

V.P. and General Manager

Dueck Auto Group

Second email from Stu Haskins, Vice President and General Manager, Dueck Auto Group

We are a firm believer in protecting customers information in accordance with the Act. It is our position that copying an individual's drivers license in advance of test driving one of our vehicles is reasonable, for legal, insurance, and security purposes.

To capture the driver's license information, we scan the information into our system, which is set to automatically delete on a regular basis. In the event the scanning system is unavailable for technical reasons, we will take a photocopy of the drivers license, which is destroyed within the same timeframes.

Only the voluntary consent form, which we ask customers to complete in advance of the test drive, is retained for our records. In the circumstances you have explained, as the form was not completed, we unfortunately will have no record of the test drive of the vehicle.

We appreciate your concern, and bringing these issues to our attention.

Yours truly,

Stu Haskins