



Third Party Contact – Consent & Renewal

Document: PR-CO-02
Revision no. 10
Revision Date: 20220623
Privacy: GENERAL

1.0 Purpose

The purpose of this procedure is to ensure we adhere to Common Collection Agency Inc. (CCA)'s policy of obtaining consent prior to disclosing confidential information to any third party at the customer's request. This includes communication with a customer's support person, or an interpreter as prescribed by the regulations of the Accessibility for Ontarians with Disabilities Act, 2005.

2.0 Scope

This policy applies to all accounts listed to CCA for recovery and all employees licensed as collection agents.

3.0 Responsibility

All employees of CCA

- Ensure they obtain the appropriate consent from customers.
- Record consent in the third-party tab on the account
- Communicate with people who are assisted by a support person or interpreter

Vice Presidents and Department Managers

- Monitor their employees and conduct ongoing training to ensure compliance.

Quality Assurance Manager

- Monitor for compliance for all departments through call monitoring and auditing.

4.0 Description of Activity

4.1 Express Consent

Agents are prohibited from releasing confidential information or discussing an account with any third party without the customer's express consent.

The only information that can be provided without consent is payment instructions. It is not permitted to release the balance of the account or creditor information.

If a debtor wants an agent to discuss their account with any third party they must provide written authorization or verbal authorization at a **recorded workstation**, where permitted based on client directives.

4.2 Consent Renewal

Authorizations must be dated and renewed every six months. Should an authorization not be renewed, all third-party contact must cease until the renewal is received.



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4.3 Records

The first and last name of the authorized third party and the expiry date of consent must be recorded in the third party tab on the customer's account.

If consent was verbal, the extension where consent was obtained should be recorded in the note field for reference.

If consent was written, a copy of the consent must be loaded to the documents tab on the customer's account in accordance with ***PR-IS-03 Document Handling***. If required, a copy must be loaded to the applicable collection platform such as FCT, Collection Highway or TDIS.

The screenshot displays a software interface with a dark blue background. At the top, there are several tabs: 'Deceased', 'Complaint', 'Trace (2)', 'Bank (0)', 'Other Info', '3rd Party (1)', and 'POE (1)'. The '3rd Party (1)' tab is selected. Below the tabs, there is a dropdown menu showing 'Test Third Party - Spouse' and a button labeled 'Add/Edit'. The main content area is divided into two columns. The left column contains the following fields: Name: Test Third Party, Company: (blank), Address: 123 Test St., Address: (blank), City: Toronto, Province: Ontario, Country: (blank), Postal Code: (blank), Closed: No, Relationship: Spouse, and DOB: 01011990. Below these fields is a table with columns 'Type', 'Phone # (Add)', 'Ext', and 'DNC'. The table contains one row: 'Home', '(416)-555-5555', (blank), and (blank). The right column contains the following fields: Type of Consent: Verbal, Expiry Date: 10/17/2013, Address Status: Address Unverified. Okay to send mail, Client Provided: No, Email: (blank), Note: Consent received at ext. 111, Other Info: (blank), Other Info: (blank), Audit Date: 04/17/2013 10:25:49 AM, and five 'User Field:' labels followed by 'Report Group:' labels.

4.4 Third Party Confirmation letter

In accordance with the Credit Business Practices Regulations, a confirmation letter must be sent to the debtor's residential address to confirm verbal consent. The letter must include the first and last name of the authorized party.

This letter is accessible from all customer accounts, labeled ***3rd Party Confirmation***.

4.5 Enforcement

This is a zero-tolerance policy. Disciplinary action will be mandatory for any noncompliance. **There is to be no deviation from this procedure for any reason whatsoever.**




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5.0 Reference

- FR-CO-3 Third Party Consent Form
- Third Party Confirmation is accessible from any customer account
- PR-IS-03 Document Handling

6.0 Change Management Table

Review Date:	20220623		
Approved By:	Todd Koyama-Asada		
Position:	President		
Revision #	Revision Date	Description of changes	
01	20121019	Updated details for AODA compliance	
02	20130417	Segregated into sections. Updated procedure details for recording on new KO. Updated document references.	
03	20150522	Updated QA Manager	
04	20160524	Updated QA Manager	
05	20170525	Reviewed	
06	20180528	Reviewed	
07	20190624	Reviewed	
08	20200622	Reviewed	
09	20210414	Annual Review	
10	20220623	Annual Review	