



IAFG GROUP PRIVACY POLICY

COMMITMENT TO PRIVACY

The **Personal Information Protection and Electronic Documents Act (the 'Act')** regulates the way private sector organizations collect, use and disclose personal information. Its main objective is to ensure personal information collected from clients is used for its stated purpose and to safeguard such information.

Independent Accountants' Financial Group Inc. ("IAFG") and our group of companies, Independent Accountants' Investment Counsel Inc. ("IAIC") and Independent Accountants' Life Insurance Agency Inc. ("IALIA") (together referred to as the "IAFG Group") are committed to keeping the personal information of our clients accurate, confidential, secure and private. Our Privacy Policy has been designed to inform employees, clients, and third parties of our commitment and recognition of our obligation to meet the spirit and terms of the Act.

Our Privacy Policy describes the principles by which the IAFG Group protects the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines the clients' rights in respect of this information. Our Privacy Policy incorporates and expands on the 10 principles for the protection of personal information, as devised by the Canadian Standards Association (CSA). The Privacy Policy applies to personal information about the clients of the IAFG Group and other individuals that is collected, used or disclosed by the IAFG Group.

WHAT IS PERSONAL INFORMATION?

Personal Information is defined as any factual or subjective information, recorded or not, about an identifiable individual, including information in any form, such as age, name, ID numbers, income, ethnic origin, blood type, opinions, evaluations, comments, medical records and credit records.

General business contact information such as name, title, business address, business phone number, etc., is not considered to be Personal Information.

The IAFG Group recognizes the importance of privacy and recognizes the sensitivity of Personal Information received by it in the conduct of its business. This policy has been prepared with this objective in mind.

ACCOUNTABILITY

The IAFG Group is accountable for the protection of all Personal Information within the organization's possession or control, including any Personal Information that has been transferred to a third-party for regulatory, legal or processing purposes. The IAFG Group has appointed a Chief Compliance Officer who is responsible for all overall privacy governance.

INFORMATION WE COLLECT

Most of the information the IAFG Group collects has been provided by you, the client, through completing an application, opening an account, completing a financial plan or communicating with us.

The IAFG Group may also collect financial and other information about you from a variety of sources, including references provided by you, through related parties including Accountants and Financial Planners, or through credit bureaus. We may also collect Personal Information about you from third parties in accordance with their respective terms and conditions and or privacy policies. Examples include third-party verification services or publicly available sources such as government agencies, registries or public record.

Information essential for fulfilling most financial requests and applications include:

- **Information establishing your identity**, such as your name, address, phone numbers, title, email address, date of birth, social insurance number or social security number (for tax purposes), and account numbers;
- **Information related to transactions** arising from your relationship with and through us, and from other financial institutions or your custodian;
- **Information you provide on an application** for the provision of our products and services, such as your annual income, place of employment, investments, account balance, financial liabilities, transaction history;
- **Information you provide during communication with us** which may include family details, life events, goals and your opinions and issues you may have encountered;
- **Information about financial behaviour** such as your investment goals and financial objectives;
- **Information about your health** which may be collected for insurance products and services;
- **Information pertaining to business clients**, such as your business name, address, phone number, email address, industry type, financial status and detail(s) on the owner(s), operator(s) and director(s);
- **Additional information** may be requested to help us determine your eligibility for products and services that we offer.

PURPOSE

We are allowed to use your Personal Information only if we have a proper legal basis to do so. This includes sharing the information outside of the IAFG Group of companies. We may use your Personal Information on the following basis:

- to fulfil a contract we have with you to provide services covered by your contract with us;
- to comply with legal and regulatory obligations;
- for legitimate business purposes. Using your Personal Information helps us to operate and improve our business and minimize any disruption to the services that we may offer to you;
- to process information based on your consent;
- for the establishment, exercise or defence of legal claims or proceedings; or
- for the purpose of fraud, crime prevention, suppression or detection

HOW WE USE YOUR INFORMATION

We may use your Personal Information for the purposes communicated to you at the time of collection or in your agreement(s) with us, including:

- to verify your identity and to authenticate you when you contact us;
- to provide you with the products and services requested;
- to communicate with you any benefit, feature and other information about products and services you have with us;
- to better understand your financial situation and determine your eligibility for products and services we offer;
- for marketing and research purposes to improve our products and services;
- to manage our risks and operations; or
- to meet regulatory and legal requirements.



Additional Uses

- We may communicate with you through various channels including telephone, computer, mail or mobile applications using the contact information you have provided.
- If you deal with multiple IAFG companies (e.g. IAIC and IALIA) we may, where not prohibited by law, consolidate all information to better manage our relationship with you and our business.
- If for any reason your information is required to fulfill a different purpose than that of your original intent, we ask for your consent before we proceed.

SHARING YOUR INFORMATION

We do not do not sell, lease or trade client's Personal Information to others, nor will the IAFG Group make its dataset available for public use. Under certain circumstances, your Personal Information may be shared among the IAFG Group or third parties.

IAFG Group

Sharing your Personal Information among the IAFG Group can allow us to help you achieve your financial goals. It's part of building and maintaining a positive advice-based relationship with you. We may share this information to better understand your financial needs and to provide products and services we believe may interest you.

However, if you would prefer that we not share your information among our group of companies please contact us by phone, email, or in person.

If you choose not to have your information shared, you will not be refused other services for that decision. We will respect your choice and may advise other IAFG companies of your preference for the sole purpose of honoring your choices.

We may share your information with other IAFG Group companies:

- in accordance with your choice;
- for the purposes of fraud or crime prevention, suppression or detection; or
- to enable the IAFG Group companies to meet regulatory, legal, financial or other reporting obligations.

IAFG Group Employees

Access to your information is restricted to authorized IAFG Group employees who have a legitimate business purpose for using it. For example, when you contact us, designated employees will access your information to verify that you are the account holder and to assist you in fulfilling your requests.

Unauthorized use and or disclosure of client information by an employee of the IAFG Group is strictly prohibited. All employees are required to maintain the confidentiality of client information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

Third Party Service Suppliers

We may use service providers to perform specialized services on our behalf such as mail/email distribution or data processing. Our service providers may at times be responsible for processing or handling Personal Information. They are provided only the information necessary to perform the services. In addition, we require them to protect the information in a manner that is consistent with our privacy policies.



ACCURACY

The IAFG Group shall take all reasonable steps to ensure that all Personal Information will be kept accurate, complete and up to date. As we make decisions based on the information we have, we encourage you to help us keep your information current.

Individuals may challenge the accuracy and completeness of Personal Information about them and have it amended, as appropriate.

SAFEGUARDS

In executing its responsibilities with respect to the confidentiality of Personal Information, the IAFG Group will employ a number of safeguards, appropriate to the sensitivity of the information, to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, limiting access on a “need to know” basis and the use of passwords and data encryption. Procedures for implementing these measures will be communicated to all employees and third parties to ensure compliance with this principle.

YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION

In the normal course of business, you receive access to information in the form of transaction activity records, including account statements. This information is routinely available to you through mailings and secure online sites.

If you want to access any Personal Information we hold about you, you may submit a written request to the Chief Compliance Officer. To avoid delays in obtaining your information, please provide sufficient detail to permit us to identify you and the specific information that you are requesting.

Please note that there may be instances where access may be restricted as permitted or required by law. We will advise you of the reasons for restricting access subject to any legal or regulatory limitations. You can request, where applicable in your jurisdiction, restriction, portability or removal of the personal data that we process about you at any time by sending a request to our Chief Compliance Officer at privacy@iaic.ca.

Any client of the IAFG Group may challenge the IAFG Group’s compliance with this Privacy Policy by contacting us directly. The IAFG Group has policies and procedures to receive, investigate and respond to individuals' complaints and questions.

If you have any questions with respect to our policies concerning the handling of your Personal Information, please contact our Chief Compliance Officer at:

Chief Compliance Officer
c/o Independent Accountants' Financial Group Inc.
135 Main Street East
PO Box 68
Listowel, ON N4W 3H2
privacy@iaic.ca
1 877 291 3040

For more information about your privacy rights, you may contact the Privacy Commissioner of Canada at the website <http://www.priv.gc.ca> or the Privacy Commissioner in your province or territory.

