

NOTICE: This document should be adapted for its appropriateness to your specific situation, before formalizing it.

[Company Name/Advisor Name]  
PRIVACY POLICY

#### Introduction

This document describes the Privacy Policy of [Company Name/Advisor Name], (hereinafter “the firm”) which has been implemented to ensure compliance with the laws and regulations relating to Privacy.

#### Application

This Policy applies to all employees, officers, directors, consultants, representatives and advisors of the firm, as well as, third parties contracted by the firm.

#### Control Objective

The objective of this Policy is to ensure that the firm in compliance with regulatory requirements regarding privacy regulations (“Regulations”).

#### Person Responsible

[The Name and the title of the individual at the firm who is responsible for Privacy related issues – usually an Officer of the firm or Compliance Officer] is hereby designated as responsible for the application of this policy, and to review this policy on a regular basis to ensure that it continue to comply with industry laws, regulations, guidelines and best practices. [The Name and the title of the individual at the firm who is responsible for Privacy related issues – usually an Officer of the firm or Compliance Officer] is also responsible to communicate this firm’s policy to all employees, officers, directors, consultants, representatives and advisors of this firm.

#### Definition

In the course of its business, it is necessary for the firm or its employees, consultants, representatives and advisors to record, store, process, transmit, and otherwise handle private information about individuals. Private information includes all information concerning an identifiable physical person (“Personal Information”).

#### Mission: Maintain the highest standards of integrity

The firm is committed to maintaining the highest standards of integrity in its business. The firm’s customers and the third parties with which it does business should feel confident that the Personal Information provided will be kept accurate, confidential and secure.

The firm takes the protection of Personal Information seriously and seeks to provide fair, secure, and appropriate methods for the handling of Personal Information.

#### The Privacy Officer

In order to ensure the effective execution of this Policy, [The Name and the title of the individual at the firm who is responsible for Privacy related issues – usually an Officer of the firm or Compliance Officer], has been appointed as Privacy Officer for the firm.

#### Responsibilities

The firm is responsible for all Personal Information in its possession, including information transferred to a third party service provider or agent.

Every reasonable effort will be made to ensure that Personal Information collected, used, retained or disclosed is accurate and relevant to the effective conduct of the firm's business.

All employees, representatives, intermediaries, consultants, advisors and other persons or organizations acting for the firm or on its behalf will be required to conform to this Policy.

#### Consent

The purpose for which Personal Information is collected from an individual will be specified on or before the collection of the information, and any change of purpose will be communicated to the individual.

Consent may be expressed in writing or be implied. It may be given verbally, electronically, or through an authorized representative.

Consent to collect, use and disclose Personal Information may be withdrawn at any time, subject to legal and contractual restrictions and reasonable notice.

#### Collection, use, disclosure and retention of Personal Information

##### 1. Collection limit

The firm will collect only the information needed for the purpose identified. Only lawful means will be used to collect Personal Information.

To the extent appropriate:

- such Personal Information will be obtained directly from the individual; and
- prior to collecting such Personal Information from any other source, the individual's written authorization will be obtained and identification of the source of the Personal Information will be kept in the file.

##### 2. Use and disclosure limit

Personal Information will not be used or disclosed for purposes other than those specified to the individual, except:

- with the consent of the individual concerned;
- where required by law;
- where reasonably necessary, to determine eligibility for a benefit; or
- to protect the interests of the firm against criminal activity, fraud, and material misrepresentation in connection with a contract.

##### 3. Retention limit

The firm will keep Personal Information as long as it is necessary, including for the purposes of updating the product or service or as required by law. When the Personal Information is no longer required, it will be destroyed using safeguards to prevent unauthorized parties from gaining access to the information during the process.

#### Safeguards

The firm will develop and maintain security procedures to safeguard and protect Personal Information against loss, theft, copying, and unauthorized disclosure, use or modification.

Access to Personal Information is restricted to the firm's authorized employees, and authorized service providers who need it to perform their work.

While the firm endeavors to protect all information, the most sensitive information receives the highest level of protection.

When Personal Information is no longer needed, it must be destroyed by shredding or other approved destruction methods.

#### Openness

Information about the Policy relating to the management of Personal Information will be made readily available to the firm's customers.

#### Individual access

An individual, upon proper identification and written enquiry, will be advised, subject to any applicable legal or ethical prohibition or privilege, of the nature and source of Personal Information about him or her, retained in the firm's records.

Any such request for access to the client's file should be forwarded to the Privacy Officer.

An individual may correct or clarify Personal Information regarding him or her retained by the firm. If it is demonstrated to the firm's satisfaction that the information in the firm's record is inaccurate or incomplete, the firm will make the necessary changes.

If the request is not dealt with to the individual's satisfaction, the client may file a complaint with the firm's senior officer(s).

#### Complaint Handling

Refer to the Complaint Handling Policy.

APPROVED ON: XXX XX, XXXX

BY: \_\_\_\_\_

[Name & title of the individual at the firm who is authorized to issue policies]

REVISED ON: XXX XX, XXXX

BY: \_\_\_\_\_

[Name & title of the individual at the firm who is authorized to amend policies]