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PRIVACY POLICY

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PRIVACY POLICY

1.0 Purpose of WGFS Privacy Policy

William Green Financial Services (WGFS) is a private for-profit Ontario incorporated business division of 1235181 Ontario Inc, owned and operated by William (Bill) Green, CFP, FDS, FMA, CPCA.

This privacy policy has been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*"). *PIPEDA* sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act.

1.1 The Ten Principles of PIPEDA Summarized

The ten principles of *PIPEDA* that form the basis of this Privacy Policy are as follows:

1. **Accountability:** organizations are accountable for the personal information they collect, use, retain and disclose in the course of their commercial activities, including, but not limited to, the appointment of a Chief Privacy Officer;
2. **Identifying Purposes:** organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;
3. **Consent:** organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's personal information;
4. **Limiting Collection:** the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
5. **Limiting Use, Disclosure and Retention:** personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the Individual consents to the alternative use or disclosure;
6. **Accuracy:** organizations are required to keep personal information in active files accurate and up-to-date;
7. **Safeguards:** organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.
8. **Openness:** organizations must inform their clients and train their employees about their privacy policies and procedures;
9. **Individual Access:** an individual has a right to access personal information held by an organization and to challenge its accuracy if need be; and
10. **Provide Recourse:** organizations are to inform clients and employees of how to bring a request for access, or complaint, to the Chief Privacy Officer, and respond promptly to a request or complaint by the individual.

This Privacy Policy applies to WGFS 's employees, contracted employees and William (Bill) Green. As well, WGFS ensures that all third party service providers sign confidentiality agreements prior to any transfer of an individuals personal information in the course of providing the business loans, business development advice, and other related information and/or services.

1.2 Definitions

"*Personal information*" means any information about an identifiable individual. It includes, without limitation, information relating to identity, nationality, age, gender, address, telephone number, e-mail address, Social Insurance Number, date of birth, marital status, education, employment health history, assets, liabilities, payment records, credit records, loan records, income and information relating to financial transactions as well as certain personal opinions or views of an Individual.

"*Business information*" means business name, business address, business telephone number, name(s) of owner(s), officer(s) and director(s), job titles, business registration numbers (HST, GST, RST, source deductions), financial status. Although business information is not subject to *PIPEDA*, confidentiality of business information will be treated with the same security measures by WGFS staff, as is required for individual personal information under *PIPEDA*.

"*Client*" means the person, persons or business that financial planning services are being provided for, (including sole proprietor-ships and individuals carrying on business in a partnership);

"*Individual*" means the client owner(s) or shareholders, co-signors, and/or any guarantor associated with a client.

"Required Data" means any fact finding, data collection or related form(s) completed by the individual(s) requesting financial planning services for the client through WGFS.

"*Data base*" means the list of names, addresses and telephone numbers of clients and individuals held by WGFS in the forms of, but not limited to, computer files, paper files, and files on computer hard-drives.

"*File*" means the information collected in the course of processing an required data, as well as information collected/updated to maintain /service the account.

"*Express consent*" means the individual completes and signs the required data, or other forms containing personal information, authorizing WGFS to collect, use, and disclose the individual's personal information for the purposes set out in the required data and/or forms.

"*Implied Consent*" means that WGFS may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.

"*Third Party*" means a person or company that provides services to WGFS or to the client with whom WGFS or the client does business with, but does *not* include any Government office .

2.0 Purposes of Collecting Personal Information

Personal information is collected in order to assess the financial needs of the individual completing an required data for financial planning services. The individual is the main source of information but WGFS may also be asked to obtain information directly from a third source where the individual does not have the required information.

Only that information which is required to complete the financial planning process will be collected. Although the individual's Social Insurance Number may be requested in the required data for confirming identification, provision of this personal information is *optional*. The individual may provide alternative forms of identification, such as date of birth and driver's license number if required.

3.0 Consent

An individual's express, written consent will be obtained before or at the time of collecting personal information. The purposes for the collection, use or disclosure of the personal

information will be provided to the individual at the time of seeking his or her consent. Once consent is obtained from the individual to use his or her information for those purposes, WGFS has the individual's implied consent to collect or receive any supplementary information that is necessary to fulfil the same purposes. Express consent will also be obtained if, or when, a new use is identified.

By signing the required data and/or other forms, implied consent is granted by the individual to obtain and/or to verify information from third parties such as banks, credit bureaus, other lenders, and insurance companies in the process of assessing the eligibility of an individual or client.

An individual can choose not to provide some or all of the personal information requested at any time, but if WGFS is unable to collect sufficient information to accurately complete the financial planning process, WGFS and the client acknowledge that the information provided during the financial planning process may not accurately reflect the clients situation

A client or an individual can withdraw consent to WGFS 's use of personal information at any time, by making such request in writing. Express consent will be obtained from the individual prior to disclosing the individual's personal information to any third party.

This Privacy Policy does not cover statistical data from which the identity of individuals cannot be determined. WGFS retains the right to use and disclose statistical data as it determines appropriate.

4.0 Limiting Collection

Personal information collected will be limited to the purposes set out in this Privacy Policy, WGFS required data collection forms, and/or other forms as required.

5.0 Limiting Use, Disclosure and Retention

5.1 Use of Personal Information

Personal information will be used for only those purposes to which the individual has consented with the following exceptions, as permitted under *PIPEDA*:

WGFS will use personal information *without* the individual's consent, where:

- the organization has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law *and* the information is used for that investigation;
- an emergency exists that threatens an individual's life, health or security;
- the information is for statistical study or research;
- the information is publicly available;
- the use is clearly in the individual's interest, and consent is not available in a timely way;

- knowledge and consent would compromise the availability or accuracy of the information, and
- collection is required to investigate a breach of an agreement.

5.2 Disclosure and Transfer of Personal Information

Personal information will be disclosed to only those WGFS employees, that need to know the information for the purposes of their work or making an assessment as to the individual's personal financial plan.

Personal information will be disclosed to third parties *with* the individual's knowledge and consent.

PIPEDA permits WGFS to *disclose* personal information to third parties, *without* an individual's knowledge and consent, to:

- a lawyer representing WGFS;
- collect a debt owed to WGFS by the individual or client;
- comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- a law enforcement agency in the process of a civil or criminal investigation;
- a government agency or department requesting the information; or,
- as required by law.

PIPEDA permits WGFS to *transfer* personal information to a third party, *without* the individual's knowledge or consent, if the transfer is simply for processing purposes and the third party only uses the information for the purposes for which it was transferred. WGFS will ensure, by contractual or other means, that the third party protects the information and uses it only for the purposes for which it was transferred.

5.3 Retention of Personal Information

Personal information will be retained in client files as long as the file is active and for such periods of time as may be prescribed by applicable laws and regulations.

A file will be deemed inactive after 24 months of no contact from the individual. Information contained in an inactive file will be retained for a period of seven (7) years. .

6.0 Accuracy

WGFS endeavours to ensure that any personal information provided by the individual in his or her active file(s) is accurate, current and complete as is necessary to fulfil the purposes for which the information has been collected, used, retained and disclosed. Individuals are requested to notify WGFS of any change in personal or business information.

Information contained in inactive files is not updated.

7.0 Safeguards

WGFS will use physical, organizational, and technological measures to safeguard personal information to only those WGFS employees, volunteers, or third parties who need to know this information for the purposes set out in this Privacy Policy.

Organizational Safeguards: Access to personal information will be limited to WGFS Employees and volunteers. Personal information provided to WGFS will be limited to only that information required to carry out the the financial planning process for the client. Staff of WGFS are not permitted to copy or retain any personal information on individuals or clients and must return for destruction all such information given to them to review once the purpose for being provided with this information has been fulfilled.

Employees of WGFS are required to sign a confidentiality agreement binding them to maintaining the confidentiality of all personal information to which they have access.

Physical Safeguards: Active files are stored in locked filing cabinets when not in use. Access to work areas where active files may be in use is restricted to WGFS employees only and authorized third parties.

All inactive files or personal information no longer required are shredded prior to disposal to prevent inadvertent disclosure to unauthorized persons.

Technological Safeguards: Personal information contained in WGFS computers and electronic databases are password protected in accordance with WGFS 's *Information Security Policy*. Access to any of the WGFS 's computers also is password protected. WGFS 's Internet router or server has firewall protection sufficient to protect personal and confidential business information against virus attacks and "sniffer" software arising from Internet activity. Personal information is not transferred to third parties by e-mail or other electronic form.

8.0 Openness

WGFS will endeavour to make its privacy policies and procedures known to the individual via this Privacy Policy as well as the WGFS *Privacy Statement*. This document will also be available on WGFS 's website: www.feeonlyplanner.ca/PIDEDA.pdf.

9.0 Individual Access

An Individual who wishes to review or verify what personal information is held by WGFS, or to whom the information has been disclosed (as permitted by the *Act*), may make the request for access, in writing, to the WGFS 's Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Officer will respond within 60 days.

If the individual finds that the information held by WGFS is inaccurate or incomplete, upon the individual providing documentary evidence to verify the correct information, WGFS will make the required changes to the individual's active file(s) promptly.

10.0 Complaints/Recourse

If an individual has a concern about WGFS 's personal information handling practises, a complaint, in writing, may be directed to the WGFS 's Chief Privacy Officer.

Upon verification of the individual's identity, WGFS 's Chief Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigation's findings to the individual.

Where WGFS 's Chief Privacy Officer makes a determination that the individual's complaint is well founded, the Chief Privacy Officer will take the necessary steps to correct the offending information handling practise and/or revise WGFS 's privacy policies and procedures.

Where WGFS 's Chief Privacy Officer determines that the individual's complaint is *not* well founded, the individual will be notified in writing.

If the individual is dissatisfied with the finding and corresponding action taken by WGFS 's Chief Privacy Officer, the individual may bring a complaint to the Federal Privacy Commissioner at the address below:

The Privacy Commissioner of Canada
112 Kent Street, Ottawa,
Ontario K1A 1H3
Tel 1-800-282-1376

Email address: www.privcom.gc.ca.

Questions/Access Request/Complaint

Any questions regarding this or any other privacy policy of WGFS may be directed to the Chief Privacy Officer. Requests for access to information, or to make a complaint, are to be made in writing and sent to the Chief Privacy Officer at the address below:

Chief Privacy Officer
William Green Financial Services
120 Milton St.
Bracebridge, Ontario
P1L 2G4

Email address: wegreen@feeonlyplanner.ca

Amendment to WGFS 's Privacy Policies

This WGFS 's Privacy Policy is in effect Jan 2, 2011. This policy is subject to amendment in response to developments in the privacy legislation. The Chief Privacy Officer will review and revise the Privacy Policy from time to time as required by changes in privacy law. Notification of any changes in the Privacy Policy will be posted on WGFS 's website, as well as in WGFS 's Privacy Statement. Any changes in the Privacy Policy will apply to Personal information collected from the date of the posting of the revised Privacy Policy on WGFS 's website: www.feeonlyplanner.ca/PIDEDA.pdf.