

# STRATEGIC WEALTH MANAGEMENT SERVICES INC. Privacy Policy

## Your Privacy is Protected: Client Privacy Policy

### Your Privacy Is Protected

At STRATEGIC WEALTH MANAGEMENT SERVICES INC., an important part of our commitment to you is respect for your right to privacy. Keeping your information and affairs in strict confidence is a cornerstone of our business and an integral part of our commitment to service excellence.

This policy will help you better understand how STRATEGIC WEALTH MANAGEMENT SERVICES INC. protects, collects, uses and discloses your personal information and your right to access your information. This policy applies to STRATEGIC WEALTH MANAGEMENT SERVICES INC.'s clients (including potential clients) in Canada. To understand the meaning of "personal information" and other terms used throughout this policy, please refer to the Important Terms section.

### Our Privacy Principles

STRATEGIC WEALTH MANAGEMENT SERVICES INC. respects the following principles when collecting, using, disclosing and protecting your personal information.

#### 1. Identifying Purposes and Obtaining Your Consent

- We identify the purposes for collecting personal information at or before the time it is collected.
- We obtain your consent before collecting, using or disclosing personal information, except where permitted or required by law.

#### 2. Limiting the Collection, Use and Disclosure of Your Information

- We limit the personal information we collect to what is necessary for the purposes we have identified. We collect information only by fair and lawful means.
- We do not use or disclose personal information for purposes other than those for which it was collected, except with your consent, or where permitted or required by law. We retain personal information only as long as necessary for these purposes.

#### 3. Keeping Your Information Accurate and Providing Access to Your Information

- We take care to keep personal information as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- Upon request, we provide you with access to your personal information. You can ask how your information is used or disclosed, can ensure it is accurate and complete, and can update it if necessary.

#### 4. Protecting Your Information

- We safeguard the privacy of personal information through security measures appropriate to the sensitivity of the information.

## 5. Addressing Your Concerns

- We are responsible for personal information under our control. There are designated individuals within STRATEGIC WEALTH MANAGEMENT SERVICES INC. who are accountable for compliance with these privacy principles.
- We make available to you, information about our policies and practices related to managing your personal information.
- We address your concerns. We have steps you can follow if you have questions or concerns about your privacy.

## Identifying Purposes and Obtaining Your Consent

### We identify why we collect personal information and how we use it

We collect, use and disclose personal information about you throughout our relationship so we can:

- establish your identity
- protect you and us from error and fraud
- understand your needs and eligibility for products and services
- recommend particular products and services to meet your needs
- provide ongoing service
- comply with legal and regulatory requirements

If we need your information for any other purpose, we will identify that purpose. We obtain most of your personal information directly from you and through the products and services you use. Some information may be obtained from other sources. For example, with your consent, we may verify some of the information you give us with your employer or your references. Generally, when we obtain information from someone other than you, such as a credit bureau, we record the source of that information.

We may review and analyze your applications, transactions and other personal information. We may do this to offer solutions that help meet your needs, and to develop new products and strategies to meet the needs of our clients. We may also do this to help us identify various types of risks such as credit, fraud, and money laundering.

### We may monitor and record telephone calls

We may monitor and record telephone calls between you and our representatives to ensure accuracy, security, service quality and for training purposes.

### Your information is collected, used or disclosed with your consent

When you apply for a product or service, we tell you about this policy and will obtain your consent. Depending on the product or service, this allows us to:

- check your employment
- obtain a credit report and exchange information with a credit bureau
- offer you other products and services
- send you information about products and services by means of direct marketing

- share your information in confidence within the STRATEGIC WEALTH MANAGEMENT SERVICES INC. (provided it is legally permitted)
- obtain your information from, or disclose your information to, others that we tell you about

If you have a product or service where ownership or liability is shared with others (for example, you have a joint account or you have a guarantor for your loan), we may share your information with them in connection with the product or service. Also, if you authorize us, we may provide your information to your lawyer, accountant, or others you've identified. Except as explained in **"There are exceptions to obtaining consent"** under this policy, we don't disclose information about you to anyone outside of the STRATEGIC WEALTH MANAGEMENT SERVICES INC. without your consent. Similarly, if we intend to use your information for a purpose we didn't tell you about previously, we will obtain your consent.

### **There are many ways we may obtain your consent**

We may obtain your express consent in writing, through electronic means, or verbally. Alternatively, your consent may be implied through an action you've taken or when you continue to use a product or service after we've notified you of a change. In some cases, we are required by law to obtain your express consent, in which case we ensure that we do so.

### **Examples of express consent:**

**Written** - You may sign an application that states "I agree to the Terms on the reverse."

**Electronic** - You may be asked to electronically acknowledge that you will be bound by legal terms or agree to certain statements. Clicking "I Agree" is your electronic consent.

**Verbal** - An STRATEGIC WEALTH MANAGEMENT SERVICES INC. representative asks whether you agree to us obtaining your credit bureau information. Saying you agree is your verbal consent.

### **Common consents and your options**

There are several common consents that may apply in your relationship with us. They are described below to help you understand when you can refuse or withdraw your consent and when this right is limited.

Refusing or withdrawing your consent will generally not affect your eligibility for STRATEGIC WEALTH MANAGEMENT SERVICES INC. offers. However, if you refuse or withdraw your consent, we may not be able to provide you with a particular product or service. We'll explain the impact on you at the time, to help you with your decision.

### **We share information within the STRATEGIC WEALTH MANAGEMENT SERVICES INC.**

We may share information about you within the STRATEGIC WEALTH MANAGEMENT SERVICES INC. for legal and regulatory purposes, to manage credit risk and other business risks, to perform analytics, and to ensure we have correct and up to date information about you, such as your current address, date of birth, etc. You may not withdraw consent for this sharing.

We may also share your information to better manage your total relationship with the STRATEGIC WEALTH MANAGEMENT SERVICES INC. and enable other members of the STRATEGIC WEALTH MANAGEMENT SERVICES INC. to bring suitable products and services to your attention. STRATEGIC WEALTH MANAGEMENT SERVICES INC. will share your information within the STRATEGIC WEALTH MANAGEMENT SERVICES INC. for these purposes unless prohibited by law or you tell us not to.

### **We ask for your consent before using your Social Insurance Number**

We are required by tax law to ask for your Social Insurance Number (SIN) when you open a product that earns income.

When we receive information from or update your information with a credit bureau, your SIN is the best way to make sure that the information actually refers to you. Wrong information could lead us to draw wrong conclusions about you. You should be aware, though, that permitting us to use your SIN in this way is voluntary for you.

If you choose not to give us your SIN when its collection is optional, or tell us you do not want us to use it for credit bureau purposes, this by itself will not prevent you from getting any products or services.

**To withdraw your consent:**

When you withdraw your consent, we will update your file as quickly as possible. It may take some time for our records to reflect your choice as many records can only be changed during regular file updates and your choice may not be captured for a promotion already in progress.



## **Limiting the Collection, Use and Disclosure of Your Information**

**We limit the personal information we collect**

While we collect various types of personal information from you and other sources, we limit the information to what is necessary for the purposes we've identified.

The information we ask for depends on the product or service requested. For example, we may ask you different questions depending on whether you apply for a bank account, an investment product or lending product. As well, we may need to ask new questions because of changes in legal and regulatory requirements.

**Types of personal information we collect**

Here are some examples of information we are required to collect to provide our products and services:

**"Know your client" information:**

We require information to meet our various "know your client" legal and regulatory requirements. For example, we need your name, address, birth date, occupation, citizenship and identification for many products and services to meet anti-money laundering requirements. We may also be required to ask for information on how you use our products or services. In addition, for certain types of investment products and services, we are required to collect information about your investment profile, including your objectives, risk tolerance and investment knowledge.

**Financial information:**

We require financial information to assess your eligibility for products and services. We also require it to ensure that the advice, products and services offered to you and the investments purchased by you (or by us on your behalf) are appropriate for you. Financial information may include account records, tax returns, financial statements, employment income and credit information.

**Social Insurance Number:**

We may be required to collect and disclose your SIN to comply with legal or regulatory requirements. For example, the Income Tax Act of Canada requires us to ask for your SIN when opening a product that earns income. Further, if you have provided your SIN it may also be used as an internal identification number to accurately identify customers having the same or similar names.

**Health information:**

Health information is required to confirm you are eligible for some insurance products offered through certain members of the STRATEGIC WEALTH MANAGEMENT SERVICES INC. We will not refuse you any product or service, other than insurance, on the basis of the health information you have given us. We will not share your health information within the STRATEGIC WEALTH MANAGEMENT SERVICES INC., other than to administer the insurance product.

**Using, disclosing and retaining your personal information**

We do not use or disclose personal information for purposes other than those for which it was collected, except with your consent, or as described below. We retain personal information only as long as necessary for these purposes.

**There are exceptions to obtaining consent**

There are exceptions where we may collect, use or disclose information without consent:

**1. If we are permitted or required by law.**

We may be compelled to release information by a court or other legal or regulatory authority. If so, our policy is to release information only to the extent that we are required to do so. We may also collect, use or disclose information without consent where permitted by law. For example, we may collect and use publicly available information like information in the telephone book for marketing or customer service purposes. Further, for legal, medical or security reasons, it may be impossible or impractical for us to obtain your consent.

**2. If we have to protect the interests of STRATEGIC WEALTH MANAGEMENT SERVICES INC.**

In certain circumstances, STRATEGIC WEALTH MANAGEMENT SERVICES INC. may have to collect, use or release information without consent for its protection. For example, we may do so when returning a cheque for "Non Sufficient Funds," when collecting an overdue account, when realizing on security pledged for a loan, or to detect or prevent fraud. If we cannot locate you, we may obtain contact information from other sources, such as government agencies and registries, and public records.

**We may share information for business transactions**

From time to time, we may sell parts of our business, insure, sell or securitize assets, or merge or amalgamate parts of our business with other parties. Since client and account information will normally be a part of the transaction, we may disclose this information to other parties in the transaction, as part of due diligence and on completion of the transaction. We require that the other parties keep this information confidential and limit its use to the purposes of the transaction.

**We retain your information**

The length of time we keep your information will vary depending on the product or service and the nature of the personal information. We have retention standards that meet customer service, legal and regulatory needs. For these reasons, we may keep your information beyond the end of your relationship with us.

When your information is no longer required, we securely destroy it or delete personally identifiable information.

**Keeping Your Information Accurate and Providing Access to Your Information**

### **We work with you to keep your information accurate**

We take care to keep the information in our records as accurate, complete and up to date as necessary for the purposes for which it is used. However, we also rely on you to tell us when your personal information changes.

It is important to ensure your personal information at STRATEGIC WEALTH MANAGEMENT SERVICES INC. is accurate and complete. This allows us to continue to offer the highest quality service and to suggest products and services that best meet your needs.

### **There may be limits on your right to access your information**

It may not be appropriate for us to release certain types of information to you. For example, our records may contain information about other clients, information that is confidential or proprietary to STRATEGIC WEALTH MANAGEMENT SERVICES INC. or information that is subject to legal privilege. Because we must protect everyone's confidentiality and legal rights, we cannot make this information available to you. However, where possible, we will suppress this information and provide you with access to the remaining records.

If we are unable to provide access or disclose information to you, we will explain why, subject to any legal or regulatory restrictions.

### **Your information and other parties**

If we have obtained information about you from others, you can ask us for the source of that information.

On request, and where legally permitted, we'll provide you with the names of outside companies or organizations to whom we've given or may have given your personal information. However, this won't include outside suppliers we've used to do work for us. This also won't include reports to the Canada Revenue Agency, particulars of cheques returned for the reason "Non Sufficient Funds" or information that has been provided for legal or regulatory reasons.

### **You can have your information corrected**

If you tell us that we have information about you that is obsolete or incorrect, we will update our records with the proper information. When appropriate, we'll correct any information which we may have given to an outside organization.



## **Protecting Your Information**

### **How we protect your information**

We limit access to your personal information and store it securely.

In addition to the physical and electronic security devices we use to protect your information, we have security standards to protect our computer systems and your information from unauthorized use or access.

Employees who have access to your information are made aware of how to keep it confidential. Each employee must sign an agreement stating that maintaining confidentiality is a condition of employment with STRATEGIC WEALTH MANAGEMENT SERVICES INC. Also, each year employees undergo a review of our Code of Conduct and certify they will abide by STRATEGIC WEALTH MANAGEMENT SERVICES INC.'s ethical and professional standards including the obligation of confidentiality and privacy.

We use contracts and other measures with our outside suppliers to maintain the confidentiality and security of your personal information and to prevent it from being used for any unauthorized purpose.

Access to your personal information is only given to those who require it to provide our products or services, or where permitted or required by law.

## Addressing Your Concerns

### **We are accountable for our compliance with this policy**

We have procedures in place to assist our employees in complying with this policy, as well as the federal Personal Information Protection and Electronic Documents Act and applicable provincial privacy legislation.

We regularly monitor our procedures and security measures to ensure that they remain effective and that they are being properly administered. Our Privacy Office and Chief Privacy Officer are accountable for overseeing compliance with this policy.

If you have any questions about our policies and practices related to managing your personal information that have not been answered in this policy, please let us know so that we may provide further information.

### **Resolving your concerns is important to us**

STRATEGIC WEALTH MANAGEMENT SERVICES INC. is committed to treating you with the greatest respect and consideration and providing the highest level of service. Even so, there may be a misunderstanding or times where you may feel you have been dealt with unjustly. Whatever the circumstances, our primary objective is ensuring your concerns are addressed.

**How to resolve concerns and complaints at STRATEGIC WEALTH MANAGEMENT SERVICES INC.** We are committed to upholding this policy. If you have any questions or complaints about this policy or about how we are living up to this policy, let us know right away.

## Important Terms Used in This Policy

When reading this policy you should be aware of the meanings we give to the following terms.

When we refer to "**personal information**" or "**information**" it means information about an identifiable individual. This includes details such as your age, marital status, education, employment history, identification numbers, financial information and credit records. Personal information does not include most of the information that appears on a business card.

When we refer to "**STRATEGIC WEALTH MANAGEMENT SERVICES INC.**", "**we**", "**our**" or "**us**" it means each of STRATEGIC WEALTH MANAGEMENT SERVICES INC. and its subsidiaries. Together they are the "**STRATEGIC WEALTH MANAGEMENT SERVICES INC.**" When we make reference to sharing information within the STRATEGIC WEALTH MANAGEMENT SERVICES INC. it means disclosure by one member of the group to some or all of the others.

When we refer to "**you**" and "**your**" it includes co-applicants, guarantors, or personal or authorized representatives.

When we refer to "**permitted or required by law**", and "**legal and regulatory**" requirements, authority or restrictions, this includes law, regulation, rules or requests of the regulators or self-regulatory organizations which apply to STRATEGIC WEALTH MANAGEMENT SERVICES INC.

At STRATEGIC WEALTH MANAGEMENT SERVICES INC., we are in the business to help our clients achieve what matters to them. Keeping your information and affairs in strict confidence is an integral part of our commitment to you.

We hope this policy provides you with the information you need to understand our privacy practices.