

Privacy Policy

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.

"Personal Information" is defined as information about an "identifiable individual". This includes such things as age, weight, height, medical records, income, education, home address and phone number. It does not cover general contact information such as name, title, business address, business phone number, etc.

Information that IAIC has collected for completion of the Investment Policy Statement, is subject to the requirements of the Act.

IAIC 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.

The need for Personal Information

We have collected Personal Information from clients to meet certain regulatory requirements and to help us establish an appropriate investment objective and risk tolerance for your managed account. This information will necessarily include Personal Information about our clients and, in certain cases, about individuals other than our clients (e.g. information on a person with trading authority over the account).

Collection, Use and Disclosure of Personal Information

Where practical, IAIC will try to collect Personal Information directly from the person to whom the information pertains. However, where appropriate, we may collect Personal Information from publicly available sources. We will collect only the Personal Information necessary for the purposes stated in the section titled, "The Need for Personal Information".

The Act provides that an individual is deemed to consent to the collection, use or disclosure of Personal Information about that individual for a particular purpose if the individual voluntarily provides the information for that purpose, and it is reasonable that a person would voluntarily provide that information.

By retaining IAIC for Investment Management Services, we consider that you have consented to our collection, use or disclosure of Personal Information as necessary to properly represent you in these financial and investment matters.

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Where necessary, to fulfil our regulatory obligations, we may collect Personal Information about individuals other than our clients in accordance with the provisions of the Acts.

When we collect Personal Information about individuals directly from them, except in situations when their consent to the collection is deemed, we will advise them the purpose for which the information is collected.

Obtaining consent from the individual after disclosure of the purpose for which the Personal Information is collected, used and disclosed, is a key element of the Act. However, this obligation is not absolute. The Act also permits us to collect, use or disclose Personal Information about an individual in some circumstances without the individual's consent. Such circumstances include (but are not limited) to where:

- The collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- Collection, use, or disclosure is reasonable for the purposes of an investigation or proceeding;
- The Personal Information is available to the public from a prescribed source; or
- The collection, use, or disclosure is required or authorized by a Federal or Provincial statute or regulation.

When we collect, use or disclose Personal Information, we will make reasonable efforts to ensure that it is accurate and complete. The Act also allows us, for legal or business purposes, to retain Personal Information for as long as is reasonable, but also imposes obligations upon us to ensure that procedures are in place to destroy the Personal Information when it is no longer required.

Security of Personal Information

We recognize our professional and legal obligations to protect the confidential information of our clients. We also recognize our legal obligations to protect the Personal Information we have gathered about our clients and about other individuals during the course of our business.

IAIC has implemented policies and procedures to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of Personal Information.

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Requests for Access to Personal Information

Pursuant to the Act, an individual may submit a written request to us to provide them with:

- A record of the Personal Information of the individual under our custody or control;
- Information about the purposes for which their Personal Information under our custody or control has been and is being used by us; and
- The names of persons to whom and the circumstances in which their Personal Information has been and is being disclosed by us.

We will respond to requests in the time allowed under the Act, and will make a reasonable effort to assist applicants, and to respond as accurately and completely as reasonably possible. Requests may be subject to certain fees and disbursements in accordance with the provisions the Act.

An individual's ability to access his or her Personal Information under our control is not absolute. The Act provides that we *must not* disclose Personal Information where:

- The disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- The disclosure would reveal Personal Information about another individual and consent is not obtained; or
- The disclosure would reveal the identity of an individual who has, in confidence, provided us with an opinion about another individual, and the individual providing the opinion does not consent to the disclosure of his or her identity.

The Act further provides that we *may choose not to* disclose Personal Information where:

- The Personal Information is protected by any legal privilege;
- The disclosure of the information would reveal confidential commercial information, and it is not unreasonable to withhold that information;
- The Personal Information was collected by us for an investigation or legal proceeding;
- The disclosure of the Personal Information might result in similar information no longer being provided to us when it is reasonable that it would be provided;
- The Personal Information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act under an agreement, under an enactment, or by a court; or

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- The Personal Information relates to or may be used in the exercise of prosecutorial discretion.

The above examples are not exhaustive, and you are encouraged to examine the provisions of the Act for a complete list.

Requests for Correction of Personal Information

An individual may also submit a written request to us to correct errors or omissions in the Personal Information of the individual that is in our custody or control. When provided with a written request, IAIC will:

- Correct the Personal Information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- Decide not to correct the Personal Information but annotate the Personal Information that a correction was requested but not made.

Contacting or Communicating with Us

If you have any questions with respect to our policies concerning the handling of your Personal Information, or if you wish to request access to, or correction of, your Personal Information under our care and control, please contact our Compliance Officer at:

Chief Compliance Officer
Independent Accountants' Investment Counsel Inc.
135 Main Street East
PO Box 68
Listowel, ON N4W 3H2
admin@iaic.ca
(519) 291-2817

If you are dissatisfied with our handling of your Personal Information, we invite you to contact our Compliance Officer in writing, setting out the reasons for your concern. If you remain dissatisfied after our Compliance Officer has reviewed and responded to your concern, you may wish to contact the Office of the Information and Privacy Commissioner.

We also encourage you to obtain a complete copy of the Act to further determine the rights and obligations contained within that legislation and to obtain independent legal advice if considered necessary.

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The contact information for the Office of the Privacy Commissioner and a copy of the Act can be obtained from the following link:

http://www.privcom.gc.ca/legislation/02_07_01_e.asp