

AdvisorOnTrack Inc. (AOT)

Personal Information Protection and Electronic Documents Act (PIPEDA) Privacy Policy

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Section 1 Introduction

This document constitutes the policy and procedures for the protection of personal information as required by Bill C-6, Protection of Personal Information and Electronic Documents Act (PIPEDA) for AdvisorOnTrack Inc. (AOT).

Section 2 AOT Policy Statement

The statement below is the AOT Policy Statement which has been reviewed and approved by the AOT Board of Directors and is posted to the AOT website.

AOT is committed to protecting any of your personal information in our possession. We will not disclose any of your personal information other than for its intended use, which is twofold:

["To drive change in the quality of information provided by financial advisors and to educate individuals on how to differentiate quality information from marketing."](#)

We will only use any personal information for the identified purposes related to this mission, and we will not disclose to others or use this information for other purposes without first obtaining consent from you. We will work to ensure that any third parties that we do business with are compliant with PIPEDA or the territorial or provincial equivalent legislation. AOT protects your electronic and paper based data with security systems to prevent unauthorized access, disclosure or misuse.

If you would like to access your personal information, please make your request in writing to: President, AdvisorOnTrack Inc., 1244 Lampman Avenue, Ottawa, ON K2C 1P8.

Section 3 Privacy Officer within AOT

The person responsible within AOT for the protection of all personal information is the President who is the designated Privacy Officer in accordance with PIPEDA. The Privacy Officer will ensure that each AOT office is compliant with the ten principles contained in PIPEDA that organizations must follow. It is her responsibility to:

- Maintain this document in a current state;
- Develop and maintain staff training programs and materials concerning these policies and practices; and
- Ensure that AOT policies and procedures are compliant with PIPEDA.

Section 4 What is Personal Information?

Personal information includes any information about an identifiable individual. For example, name, address, gender, age, ID numbers, income, ethnic origin, employee files, opinions, evaluations, comments, social status, or disciplinary actions, existence of a dispute, intentions (for example, to change jobs). An individual's name need not be attached to the information in order for it to qualify as personal information. Personal information does not include an employee's name, title, business address or telephone number or the use or disclosure of personal information strictly for personal purposes, (e.g. personal greeting card list).

Section 5 Personal Information Collected by AOT

The following is a list of personal information collected by AOT:

- Contact lists for information sharing and communications;
- Information related to employment at or through AOT;
- Information received from persons seeking employment at or through AOT;
- Information received from persons considering the hiring of AOT;
- Information received from and about persons registered in workshops, seminars, and other programs offered by AOT and/or its partners and/or its clients;
- Information received from persons completing comment forms from AOT workshops, seminars, and other programs offered by AOT and/or its partners and/or its clients;
- Information posted to the AOT website, including the AOT Advisors Only section;
- Information received from participants in industry consultation activities; and
- Information provided to and received from third parties, such as consultants, who are contracted by AOT to do work for AOT and on behalf of AOT clients.

Section 6 General Safeguards to Protect Personal Information

To protect the personal information within the AOT offices, the following procedures are in place:

- Main access doors are locked during non-business hours;
- Doors to the offices (and files) and the office where the computer servers are located are locked when staff are not in the office;
- The AOT network uses a combination of hardware, software applications and security polices to secure the AOT electronic network. AOT has in place an Internet firewall, which has a number of features that are designed to block-unauthorized access to the AOT network;
- To ensure that our firewall remains secure no AOT computers are allowed to run any programs that open ports in the firewall that can then be accessed by a hacking program;
- All servers and workstations receive regular software upgrades and security patches the installation of which are recommended by our computer vendors;
- A layered Anti-Virus system scans incoming and outgoing e-mails for computer viruses;
- The AOT website offers a secured connection;
- All emails sent by AOT are encrypted.

Section 7 Process for Handling Requests for Personal Information

The following process is related to access of information. A person may request information about the existence, source, use and disclosure (including third parties) of his/her personal information:

1. The person must make a written request to AOT's President for details about his/her personal information.
2. This request is directed to the Privacy Officer.
3. The Privacy Officer responds to the person in writing within two weeks of receiving the request.
4. If the person wishes to obtain a list of personal information on file with AOT, the Privacy Officer will send him/her a hard copy of the list through the mail, marked confidential.
5. If an individual would like to personally examine the personal information on file with AOT, the Privacy Officer will schedule a meeting with that person in Ottawa to give them access to this personal information.
6. In the letter and/or during the meeting, the Privacy Officer will advise the individual that he/she may follow up at any time.
7. After sending the letter or holding the meeting with the person, the Privacy Officer will record the letter/meeting information in a hard copy file that is stored in a locked file cabinet.

Section 8 Removal of Personal Information

An AOT client, employee, or person on an AOT contact list may request the removal of the information in Section 4 at any time, subject to legal or contractual restrictions. The request must be made in writing with reasonable notice. If the consent to hold information is withdrawn, AOT will destroy that information

in accordance with the procedures in Section 9 and carry out any other action related to the implications as necessary.

Section 9 Process for Destruction of Personal Information

There are two situations when the destruction of personal information will be necessary; when there has been a withdrawal of consent or when the retention of information is no longer necessary in the opinion of AOT. The process is as follows for removal of personal information:

1. At the end of each month, the Privacy Officer will gather the information to be destroyed (in both paper format and electronic).
2. The paper-based information will be burned.
3. The electronic information will be deleted from all of the electronic files where it is stored.
4. The Privacy Officer will check all of the available electronic drives and files to ensure it is deleted.
5. The information will be deleted from all backup records. Once the information is destroyed, the Privacy Officer will record the event in the file labeled "Destruction of Personal Information".
6. The file will be stored in a locked file cabinet, only accessible by the Privacy Officer.

Section 10 Compliance Challenges

Any individual may address a challenge concerning AOT compliance with PIPEDA with respect to Section 4 to the Privacy Officer. The complaint procedure is outlined in Section 11. AOT will investigate all complaints, and if justified, take appropriate measures, including amending these policies and procedures.

Section 11 Process for Handling Compliance Challenges

When AOT receives a compliance challenge or complaint, the following steps will be taken:

1. If the challenge or complaint is communicated orally, the person will be asked to complete the request in writing and return it to the Privacy Officer.
2. When the challenge or complaint is received in the AOT office, the Privacy Officer is immediately made aware of the information received including the contact information for the complainant.
3. The Privacy Officer reviews the complaint and responds to the petitioner within a reasonable amount of time.

Section 12 Review and Assessment

This PIPEDA policy and contents will be assessed, reviewed and updated on at least an annual basis or more frequently as amendments to PIPEDA necessitate. As the contents of this policy are dynamic, each AOT staff members and contractors will be required to review this policy once a year, to maintain their knowledge of privacy requirements and provide feedback on the content.