

***yourCFO* ADVISORY GROUP INC. &
yourCFO WEALTH MANAGEMENT INC.
CLIENT PRIVACY CODE**

yourCFO's Client Privacy Code informs you of our commitment to and policy on privacy. It tells you about the ways we ensure that your privacy and the confidentiality of your information are protected. Respect for your privacy and the confidentiality of your personal and financial information has been a fundamental value of *yourCFO* Advisory Group Inc. and *yourCFO* Wealth Management Inc. (hereinafter collectively referred to as "*yourCFO*") in the past, and will remain so in the future.

We often review and adopt new technologies, like the internet, to serve you better. As we do so, respect for privacy will remain among our foremost concerns. We will adapt our systems so that your personal information is kept confidential and secure. As new laws come into force, like the federal privacy statute, we will make every reasonable effort to ensure that we are fully compliant.

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▶ ***yourCFO*'s Commitment to Privacy**

The objective of *yourCFO*'s Client Privacy Code is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the *Personal Information Protection and Electronic Documents Act* (Canada) and other applicable privacy legislation.

yourCFO will conduct periodic reviews of this Client Privacy Code to make sure that it remains current with changing industry standards, technologies and laws.

▶ ***yourCFO*'s Client Privacy Code**

This Client Privacy Code only applies to identifiable individuals whose personal information *yourCFO* collects, uses, retains and discloses in the course of commercial activities.

As well, when we use the words "personal information" or "information" in this Code, we mean information about an identifiable individual. These terms do not include information that does not identify particular individuals, like aggregate statistics or anonymous Client data.

This Client Privacy Code applies to all aspects of handling an individual's personal information, including collection, use, retention and disclosure.

yourCFO's Client Privacy Code consists of these key principles:

▶ **Compliance With Legal and Industry Standards**

We will make every reasonable effort to comply with industry standards and applicable federal and provincial laws in Canada, including the *Personal Information Protection and Electronic Documents Act*.

▶ **Purposes for the Collection, Use, Retention and Disclosure of Information about You**

The following are our purposes for collecting, using, retaining and disclosing your personal information:

- To establish and serve you as a client;
- To provide you with information about products and services that we believe would interest you;
- To detect and prevent fraud;
- To meet legal and regulatory requirements, and to comply with government and our regulators' requirements, including disclosure requirements connected with tax, auditing and securities regulation;
- To manage *yourCFO*'s business, including in the unlikely event of a reorganization of *yourCFO* or a proposed or actual sale or lease of all or part of *yourCFO* or its' assets; and
- To achieve any other purpose to which you have given your consent.

▶ **Giving You Control Over How We Handle Information about You**

We collect, use, retain and disclose information about you only with your consent, except as outlined in this Client Privacy Code. In obtaining your consent, whether express or implied, our purposes for which we require your information are outlined herein. We will not depart from these original and stated purposes unless you give your further consent.

We may depart from this consent principle only in accordance with the limited exceptions described in this Client Privacy Code, when permitted by other written and posted policies established by *yourCFO*, where required by our regulators or where required or permitted by applicable laws (for instance, we may disclose personal information in an

emergency to protect human life or safety).

▶ **Limiting Disclosure to Third Parties**

We may provide your information to other persons only:

- when we have your consent, whether expressed or implied; or
- to the suppliers or agents who assist us in providing the services you request, including our 'carrying' broker(s), whom we can reasonably trust to respect your privacy; or
- if and when we are involved in a corporate reorganization or we are involved in a potential or actual sale or lease all or part of our business or assets; or
- when we are required by our regulators to do so. (This includes collection, use and disclosure to and by our regulators. Our regulators include, without limitation, the Investment Industry Regulatory Organization of Canada, Market Regulation Services Inc., the Mutual Funds Dealers Association of Canada, Bourse de Montreal Inc., the Canadian Investor Protection Fund, the federal ombudsman and various provincial securities commissions (referred to as, "our regulators" throughout this Client Privacy Code)); or
- when we are required or permitted by law or regulation to do so; or
- when we need to disclose the information to protect our interests in the context of an existing or potential legal or administrative proceeding.

▶ **Safely Storing Information about You**

We will protect your information with appropriate safeguards and security measures. We will retain your information only for the time that it is reasonably required.

▶ **Providing You with the Right to Access and Update Information about Yourself**

We will give you access to the information we retain about you. We will make every reasonable effort to keep your information accurate and up-to-date.

▶ **Responding to Your Privacy Concerns**

We must decline to accept or to administer an account in respect of which you refuse or withdraw your consent to the collection, use or disclosure of your information by us in certain circumstances, including collection, use or disclosure required by our regulators. We will investigate and respond to your concerns about any aspect of our handling of your information or direct you to the organization on whose behalf we are collecting and handling your information, where appropriate. We have appointed a privacy officer who will oversee compliance on our part and ensure that your concerns are addressed appropriately by *yourCFO*.

In this Client Privacy Code, we will explain how we fulfill each of these important principles.

Why We Ask For Your Information

We ask for information from Clients in order to establish and serve them as clients.

At yourCFO, we gather and use personal information to provide you with the financial services you have requested, or to offer additional products and services we believe you might be interested in. We obtain most of our information about you directly from you.

The types of information we ask for depends on the nature of your request. Information that is essential for fulfilling most financial requests and applications typically includes your name, mailing address, e-mail address, phone number(s), account number(s) and Social Insurance Number.

In order for us to provide you with our services, it is a regulatory requirement imposed by certain of our regulators for us to obtain personal information about you. In addition, we are required to ask for information to be compliant with our industry's "Know Your Client" rule, which includes obtaining information from you regarding your account objectives, risk tolerance level, investment knowledge, past experience, income and net worth. In the case of insurance products and services, we may also collect health information about you where the law permits or requires it, or with your consent.

Our regulators may require access to your information, whether you are a current or former client or an agent. We collect and disclose your information to our regulators and our regulators collect, use and disclose your information for regulatory purposes, including:

- surveillance of trading-related activity;
- sales, financial compliance, trade desk review and other regulatory audits;
- investigation of potential regulatory and statutory violations;
- regulatory databases;
- enforcement or disciplinary proceedings;
- reporting to other securities regulators; and
- information-sharing with securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

We only collect the information needed and only use it for the purposes explained to you.

When we contact you, we will indicate how we intend to use the information we collect from you if our purposes differ from that outlined in this Client Privacy Code. If we wish in the future to use the information collected for purposes not previously identified, we will ask you for your consent at that time. We will only ask for the information necessary for the purposes we identified. We will indicate which information is optional for you to provide.

When We Disclose Your Information

yourCFO will not disclose information about you to third parties without your consent, except:

- for servicing purposes (such as to our carrying broker(s));
- when we are required by our regulators to do so;
- when we are required or permitted by law to do so;
- when we wish or are required to disclose to fulfill a public duty, such as preventing fraud;
- when we are protecting or advancing our interests in the context of dealings with regulators, licensing or industry bodies, administrative tribunals or courts;
- under an exception to the requirement for consent expressly set out in applicable laws, such as exception for disclosures necessary to protect human life or safety in an emergency;
- in connection with a corporate reorganization or a potential or actual sale or lease of all or part of *yourCFO* or its' assets. (In such circumstances, we may share information with another entity that is or might be part of the transaction.)

In all such cases, *yourCFO* will only make disclosure to the extent that is necessary to accomplish its business purpose or discharge its regulatory, legal or public duty. Whenever possible, *yourCFO* will also require that the party receiving the information provides reasonable assurances that it will respect the privacy of your information in accordance with applicable laws.

The following list provides some examples of situations in which we disclose your personal information:

- *yourCFO* discloses client information to its suppliers and agents, including its carrying broker(s), for the purposes of providing its clients with the services they request.
- *yourCFO* also discloses client information to our regulators in accordance with applicable securities regulations.
- *yourCFO* must give information in response to a valid demand, search warrant or other legally valid enquiry or order. We may disclose information to the authorities to serve a clear public interest and fulfill our public duty - such as to protect against fraud or other criminal activity. We may also take action to protect our interests, which may result in disclosing information to parties outside *yourCFO* (for example, *yourCFO*'s corporate lawyer(s)).

How We Protect Your Information

We will protect your information with appropriate safeguards and security measures.

We have reasonable security standards to protect our systems and your information against unauthorized access and use. All safety and security measures employed by *yourCFO* are appropriate to the sensitivity level of your information.

Electronic client files are kept in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets. Access is also highly restricted. In terms of online security, we appropriately manage our server environment and firewall infrastructure. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is protected.

When we disclose information to a third party for a purpose that is permitted under this policy, we shall disclose no more than is necessary to accomplish the purpose, and whenever possible, obtain reasonable assurances that the third party will respect your privacy in accordance with applicable laws.

When we provide information in response to a legal enquiry or order, we ensure that the order is valid and we disclose only the information that is legally required.

We retain your information only as long as it is reasonably required.

When your information is no longer needed by *yourCFO*, we have procedures to destroy, delete, erase or convert it to an anonymous form.

The retention period may extend beyond the end of your relationship with us but only for so long as required by law or regulation or as is reasonably required by us.

Your Right To Access Your Information

We will give you access to the information we have about you.

It is important that your personal and financial information is accurate and complete. Please contact your *yourCFO* Investment Advisor or their assistant if you wish to have access to any information we may have about you. We will advise you in advance if a minimal charge is required for *yourCFO* to conduct a search of our records for information about you, and will respond to your request within 30 days.

Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to *yourCFO*, is too costly to retrieve, or cannot be disclosed for other legal reasons. As well, under federal law there are a few special circumstances, such as the filing of a "suspicious transaction report", where it can be unlawful for us to report to you what we have told law enforcement agencies.

Keeping Your Information Accurate

We will make reasonable efforts, as appropriate or as required by the company on whose behalf we have contacted you, to keep your information accurate and up-to-date.

If you find any errors in our information about you, let us know and we will make the appropriate corrections and make sure they are conveyed to anyone we may have misinformed. In order to make a change to the personal information *yourCFO* holds about you, please send us the correction in writing by mail, fax or e-mail.

For information that remains in dispute, we will make a note of your opinion as to the accuracy of the information in our files.

Recording Your Options

In certain circumstances, we must decline to accept or to administer your request or account where you refuse or withdraw consent to the collection, use or disclosure of your information by us.

Any refusal or withdrawal of your consent to the collection, use and disclosure of your information is subject to legal, regulatory and/or contractual restrictions and reasonable notice. If you wish to withdraw your consent, please contact our offices. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent.

Updating This Code

Any changes to *yourCFO's* Client Privacy Code or our information handling practices will be recorded in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. However, we will not use any information collected prior to such changes for any new purposes without first obtaining your consent.

Who Can Answer Your Questions About Privacy?

If you have any concerns or questions about privacy and confidentiality - or any concerns about the way a request for information was handled - you can take the following action:

Contact *yourCFO's* Privacy Officer: Douglas Leyland, C.A., MBA
Phone: (905) 331-2885
Toll Free: 1-888-539-5263
Fax: (905) 331-2886
E-mail: dleyland@yourCFOinc.com

Our Privacy Officer has the decision-making authority to resolve most concerns. However, if you are unsatisfied with the way your complaint or request was addressed, you may contact the federal privacy commissioner:

Office of the Privacy Commissioner
112 Kent Street
Ottawa, Ontario K1A 1H3