

# MACKAY BREHM & SMITH

## Chartered Accountants Professional Corporation

### PRIVACY POLICY

MACKAY BREHM & SMITH, Chartered Accountants, Professional Corporation is committed to maintaining and protecting personal information of our clients, staff, and any other person who may provide us with confidential information, including users of our website, in order to better serve our clients and to fulfill the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA).

This Privacy Policy governs our dealing with "personal information". Personal information means any information about an identifiable individual including such information as age, gender, religion, ethnic background, family status, political affiliations, health, purchasing and spending habits, credit and loan records, investments, tax returns, financial information, email address, home address and home phone number. Personal information does not include business information such as the name, title, business address, or telephone number of an employee of an organization.

**Accountability:** We are responsible for all personal information in our possession or control. This would extend to information to which third parties who provide goods or services to our firm may have access, such as: contract accountants, security and maintenance personnel, information technology advisors, delivery persons, temporary personnel, and website managers. We restrict access to such third parties as much as is reasonably possible and obtain their written agreement that they will follow our privacy policy. We will require express consent from our clients to release any personal information to third parties in the course of business on behalf of the client such as: spouses, bankers, lawyers, investment advisors, other accountants, business valuation specialists, and similar professionals associated with our clients.

**Purposes of collecting information:** We collect, use and disclose personal information to serve our clients and for other purposes which would be considered related or otherwise reasonable in the circumstances. For example, we primarily collect, use and disclose personal information for the following reasons:

- To evaluate client needs and advise on financial and business matters
- To prepare tax returns and related documents on behalf of our clients
- To prepare financial statements
- To permit us to communicate our services to clients or prospective clients through mailings or our website

Other reasons we collect, use and disclose personal information may include but are not limited to the following:

- Advising clients on financial issues
- To invoice clients, process and collect accounts
- To report to required regulatory authorities, including our insurer and the Institute of Chartered Accountants of Ontario.
- In the event we were to sell our business or to merge with another entity and that party required a due diligence investigation of our firm, we would require a confidentiality agreement from such third party prior to any disclosure.

When personal information has been collected and is to be used or disclosed for a purpose not previously identified, the new purpose will be identified prior to its use or the disclosure, and consent for the specified purposes sought. Use of personal information shall be limited to that which is necessary for the purposes identified in this Privacy Policy.

**Consent:** Generally all personal information is held in strict confidence and we will obtain consent, either express or implied, to use or disclose personal information unless otherwise permitted or required by law. Such circumstances could include: information that is publicly available

as defined by the regulation; where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely manner; to act in the event of an emergency that threatens the life, health or security of the individual; for debt collection; or to comply with a subpoena, warrant or court order.

**Retention:** Personal information may be retained as long as we consider necessary to ensure the accuracy and integrity of client records and to provide quality professional services and advice to clients and to account to regulatory authorities. However, when personal information is no longer needed for the purpose acquired or to properly serve and advise the client they will be destroyed.

**Safeguarding:** Personal information is protected with appropriate security precautions against loss, theft, or unauthorized use whether on paper or electronically stored. Our staff is trained to be aware of the importance of maintaining the confidentiality of personal information. Care is used in the disposal and shredding of personal information to prevent unauthorized access. Third party contractors or agents who have access to personal information will be required to confirm that they follow appropriate privacy practices.

**Openness and Accuracy:** We will make every effort to ensure that personal information collected is as accurate, complete, and up-to-date as necessary for the purposes that it is to be used. Our Privacy Policy will be made available to all clients, employees and others who may have access to personal information. Our Privacy Information Officer is William Brehm who is accountable for our office privacy policies. He is the person to whom any complaints or questions may be addressed. Copies of our confidentiality agreements, express consent authorization, and privacy policy are available upon request. Upon written request you will be advised within 30 days whether we hold personal information about you. If it is necessary to extend our response beyond 30 days we will provide an explanation of our reasons. We will allow you to access this information. We will provide an accounting of how your personal information has been used, including third party disclosures. You are free to challenge the accuracy and completeness of the information and to seek to have it altered, amended, or changed.

**Compliance:** The Privacy Information Officer in our office will investigate each and every written complaint. If a complaint is found to be justified, the Privacy Information Officer will take appropriate measures including, if necessary, amending any office policies and practices. The Privacy Commissioner of Canada may be contacted to forward any unresolved complaint.

Any questions may be directed to;  
William Brehm, Privacy Information Officer  
MacKay Brehm & Smith,  
Chartered Accountants Professional Corporation  
3410 S. Service Road  
Burlington, ON L7N 3T2 Telephone: 905-333-5753