

Allan Financial Privacy Policy

Our Commitment to Protecting your Privacy

We make best efforts to comply with the federal Personal Information and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws. We strive to maintain the highest standards of confidentiality to ensure the protection of your personal information. We also adhere to the Canadian Anti-Spam Legislation and Regulations (CASL) and will only communicate electronically with your consent or where the information provided is necessary to the on-going good standing status of your policy.

How We Collect, Use, Share, Disclose and Retain Your Information

With your consent, we collect information that helps us formulate advice and a recommendation of the most suitable products or services available to purchase through us. We collect all personal and corporate information including related personal details, financial and health information and use and retain it solely for the purposes of providing advice.

We convey your personal information to Insurers through wholesale organizations known as Managing General Agencies (MGAs), which are contracted to provide administrative services to them. We are required to retain much of the information we collect for regulatory reasons including demonstrating that the recommendations we make are suitable and have addressed your identified needs.

Consent

We use your personal information to identify products, concepts and services to address needs you have identified. By signing this form, you agree:

- to provide accurate, current and updated information throughout our business relationship as your circumstances change,
- to allow us to use, share and disclose this information on an as-needed basis with our suppliers, associates and wholesale organizations, which may mean retaining some information on file for future use and reference by us, our suppliers and any assignees,
- to allow us to retain your personal information including, health information as detailed on your
 applications and any financial details you have provided, in our records for as long as we are
 your advisor or have a business or regulatory need to retain the information,
- to allow us to house your personal information on our local, internal server as well as on third
 party storage platforms (such as Salesforce.com and others which may be housed outside of
 Canada); and
- to the assignment of your file, including your personal information, to another agent and/or agency, to continue to service your needs, in the event that we become incapacitated, die or retire. You would, however, have the right to choose your own agent, should you not agree to the agent chosen for the re-assignment.



Your Rights to Access

You have the right to access the personal information that we hold about you. You also have the right to have it corrected should it be in error.

How We Protect Your Personal Information

All employees, associated advisors, wholesale organizations and suppliers that are granted access to client records are required by law and regulation to keep this information protected and confidential and to use the information only for the purposes identified. We have established physical and systems safeguards, along with proper processes, to protect client information from unauthorized access or use. We do not sell your personal information to anyone nor do we share your personal information with organizations outside of our relationship with you that would use it to contact you about their own products or services.

Accountability & Safeguards

We are responsible for the personal information that we receive from you. We take appropriate and reasonable measures to safeguard that information in whatever form it is held. Any policies and practices relating to the management of your personal data are also publicly and readily available.

In the unlikely event of a privacy breach, we would take the following steps: immediately contain the breach; designate an appropriate individual to lead the initial investigation; determine the need to assemble a team which could include representatives from appropriate parts of the business; determine who needs to be made aware of the incident internally, and potentially externally, at this preliminary stage; escalate internally as appropriate; and be careful not to eliminate evidence that may be valuable in determining the cause or allow us to take appropriate corrective action.

Once these immediate steps are taken to mitigate the risks associated with the breach, we will take the time to investigate the cause of the breach and consider whether to develop a new prevention plan.

Your Privacy Choices

You may withdraw your consent, which allows us to retain your personal information on file, at any time (subject to legal or contractual obligations) by providing us with reasonable notice.

Withdrawing your consent may prevent us from providing you with appropriate updates on products or services which may be in your best interests and/or fit into your long-term financial plan.

Your Right to Complain

You have the right to complain confidentially to us, to the insurer and to the Privacy Commissioner of Canada where you believe there has been a breach of your personal information to an unauthorized party.