



**J.J. MCATEER & ASSOCIATES INCORPORATED
EMPLOYEE BENEFIT PLAN SERVICES LIMITED
APRIL 2016 – SUMMARY OF PRIVACY POLICY
DISCLOSURE OF PERSONAL INFORMATION**

Personal Information – Personal Information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes Information, in any form, such as:

- age, name, ID numbers (including Social Insurance Numbers), income, ethnic origin, or blood type;
- opinions, evaluations, comments, social status, or disciplinary actions;
- employee files, credit records, loan records, medical records

Personal Information is not – Personal Information does not include the name, title or business address or telephone number of an employee or a member of an organization.

Privacy of Personal Information is the cornerstone of our office procedures and policies. We understand the importance of protecting Personal Information. We are committed to collecting, using and disclosing Personal Information responsibly. We will be as open and transparent as possible about the way we handle Personal Information.

All staff that comes into contact with Personal Information are aware of the sensitive nature of the information disclosed to us. They are all trained in the appropriate uses and protection of Personal Information. Our staff ensures that:

- Only necessary Information is collected;
- We share Information with consent;
- Storage, retention and destruction of Personal Information complies with applicable legislation;
- Our privacy protocols comply with applicable legislation.

Our office adheres to the following 10 principles of the Canadian Standards Association's (CSA) Model Code for the Protection of Personal Information respecting privacy:

1. Accountability – Our organization is responsible for the Personal Information under our control. We have designated individuals who are accountable for our organization's compliance with the following principles.

2. Identifying Purposes – The purpose for which Personal Information is collected shall be identified at or before the time the Information is collected.

3. Consent – The knowledge and consent of the individual are required for the collection, use, or disclosure of their Personal Information, except where inappropriate.

4. Limiting Collection – The collection of Personal Information shall be limited to that which is necessary for the identified purposes. Personal Information shall be collected by fair and lawful means.

5. Limiting Use, Disclosure, and Retention – Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal Information shall be retained only as long as necessary for fulfilment of those purposes.

6. Accuracy – Personal Information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

7. Safeguards – Personal Information shall be protected by appropriate security safeguards.

8. Openness – We shall make readily available specific Information about our policies and practices relating to the management of Personal Information.

9. Individual Access – Upon request, an individual shall be informed of the existence, use, and disclosure of his or her Personal Information and shall be given access to that Information. An individual shall be able to challenge the accuracy and completeness of the Information and have it amended as appropriate.

10. Challenge Compliance – An individual shall be able challenge our compliance with the above principles by contacting the designed Privacy Officer.

If you have any questions or concerns about our Privacy Policy, please contact the Privacy Officer at one of our locations listed below:

Tara Seebaran

Ontario Office

45 McIntosh Drive
Markham, Ontario
L3R 8C7

Tel: 905-946-8655

Fax:905-946-2535

Debbie Pawlick

Alberta Office

16214 – 118 Avenue
Edmonton, Alberta
T5V 1M6

Tel: 780-452-1331

Fax:780-487-4063