

PRIVACY POLICY

At FineEQ, your privacy is and always has been very important to us. We are committed to providing you with the best possible service while safeguarding your personal information. On January 1, 2004, the federal Personal Information Protection and Electronic Documents Act (PIPEDA) took effect for all commercial organizations in Canada. It helps balance the need for business to gather and use personal information personal information with your right to privacy. As required by the legislation, FineEQ has in place policies and procedures to effectively safeguard confidential information.

- 1. FineEQ is responsible for personal information under the control of FineEQ and is accountable for compliance with the terms and procedures of this Privacy Policy.
- 2. FineEQ believes in collecting and using personal information responsibly and only for the purposes for which it was collected. We will identify the purposes for which we are collecting personal information before or at the time the information is being obtained and will not use or disclose it for any purpose other than those for which it was collected. Personal information is collected to ensure FineEO has all information necessary to:
 - To satisfy legal and regulatory requirements
 - Establish and administer your account
 - Provide all required tax reporting
 - To verify your identity and protect you and FineEQ against error or fraud
 - To otherwise carry out normal business operations
- 3. The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where the law provides an exemption. We will collect, use, disclose and retain personal information for the purposes described in this Policy. However, you have the choice to withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.
- 4. FineEQ collects personal information only to the extent necessary for the purposes identified above. The personal information is collected using only fair and lawful policies and procedures.
- 5. Personal information will 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 will be retained only as long as necessary for the fulfillment of those purposes.
- 6. FineEQ has a responsibility to ensure that all personal information on file is accurate, complete and up-to-date. Clients may, in writing, request that their personal information be amended as appropriate.
- 7. Security safeguards are in place to protect personal information against loss or theft, as well as unauthorized access.
- 8. FineEQ will make readily available to individuals specific information about its policies and practices relating to the management of personal information.
- 9. Clients may request, in writing, access to their personal information. When making such requests we ask that you provide proof of identity and specifics about the type of information you are requesting. Requests should be sent to:

Privacy Officer FineEQ Insurance Services 650-1445 Portage Ave Winnipeg, MB R3G 3P4

10. You have the right to make an inquiry, suggestion or complaint regarding FineEQ's personal information practices. If we are unable to rectify the complaint, you may contact the office of the Privacy Commissioner of Canada.

Office of the Privacy Commissioner Of Canada 30 Victoria Street Gatineau, Quebec K1A 1H3