



The Objective Financial Partners Inc. PRIVACY CODE

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Introduction

At Objective Financial Partners Inc., respecting privacy is an important part of our commitment to our clients and employees. That is why we have developed The Objective Financial Partners Inc. Privacy Code. The Objective Financial Partners Inc. Privacy Code is a statement of principles and guidelines regarding the minimum requirements for the protection of personal information provided by Objective Financial Partners Inc. to its clients and employees. The objective of The Objective Financial Partners Inc. 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).

Objective Financial Partners Inc. will continue to review The Objective Financial Partners Inc. Privacy Code to make sure that it is relevant and remains current with changing industry standards, technologies, and laws.

Summary of Principles

Principle 1 - Accountability

Objective Financial Partners Inc. is responsible for personal information under its control and shall designate one or more persons who are accountable for Objective Financial Partners Inc.'s compliance with the following principles.

Principle 2 - Identifying Purposes for Collection of Personal Information

Objective Financial Partners Inc. shall identify the purposes for which personal information is collected at or before the time the information is collected.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a client or employee are required for the collection, use, or disclosure of personal information, except where inappropriate.

Principle 4 - Limiting Collection of Personal Information

Objective Financial Partners Inc. shall limit the collection of personal information to that which is necessary for the purposes identified by Objective Financial Partners Inc. Objective Financial Partners Inc. shall collect personal information by fair and lawful means.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Objective Financial Partners Inc. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.



Principle 7 - Security Safeguards

Objective Financial Partners Inc. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

Principle 8 - Openness Concerning Policies and Procedures

Objective Financial Partners Inc. shall make readily available to clients and employees specific information about its policies and procedures relating to the management of personal information.

Principle 9 – Client and Employee Access to Personal Information

Objective Financial Partners Inc. shall inform a client or employee of the existence, use, and disclosure of his or her personal information upon request and shall give the individual access to that information. A client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 - Challenging Compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Objective Financial Partners Inc.'s compliance with The Objective Financial Partners Inc. Privacy Code.

Scope and Application

The ten principles that form the basis of The Objective Financial Partners Inc. Privacy Code are interrelated and Objective Financial Partners Inc. shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. *As permitted by the Personal Information Protection and Electronic Documents Act (Canada)*, the commentary in The Objective Financial Partners Inc. Privacy Code has been drafted to reflect personal information issues specific to Objective Financial Partners Inc.

The scope and application of The Objective Financial Partners Inc. Privacy Code are as follows:

- The Objective Financial Partners Inc. Privacy Code applies to personal information collected, used, or disclosed by Objective Financial Partners Inc. in the course of commercial activities.
- The Objective Financial Partners Inc. Privacy Code applies to the management of personal information in any form, whether oral, electronic, or written.
- The Objective Financial Partners Inc. Privacy Code does not impose any limits on the collection, use or disclosure of the following information by Objective Financial Partners Inc.:
 - (a) an employee's name, title or business address or telephone number;
 - (b) information that Objective Financial Partners Inc. collects, uses, or discloses for journalistic, artistic, or literary purposes and does not collect, use, or disclose for any other purpose; or
 - (c) other information about the individual that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act (Canada).



- The Objective Financial Partners Inc. Privacy Code will not typically apply to information regarding Objective Financial Partners Inc.'s corporate clients. However, such information may be protected by other Objective Financial Partners Inc. policies and practices and through contractual arrangements, and personal information about individuals associated with corporate clients (e.g., directors, officers, shareholders) remains subject to this Privacy Code.
- The application of The Objective Financial Partners Inc. Privacy Code is subject to the requirements and provisions of the Personal Information Protection and Electronic Documents Act (Canada), the regulations enacted thereunder, and any other applicable legislation or regulation.

Definitions

Collection:

The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

Consent:

Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Objective Financial Partners Inc.. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

Client:

An individual who purchases or otherwise acquires or uses any of Objective Financial Partners Inc.'s products or services or otherwise provides personal information to Objective Financial Partners Inc. in the course of Objective Financial Partners Inc.'s commercial activities. This includes a prospect (or potential client): An individual who has inquired about Objective Financial Partners Inc.'s services, attended an event, subscribed to updates, or otherwise provided contact information but is not yet a client. All such individuals are hereinafter referred to as "clients".

Disclosure:

Making personal information available to a third party.

Employee:

An employee of or independent contractor to Objective Financial Partners Inc.

Personal information:

Information about an identifiable individual, but does not include the name, title, business address, or telephone number of an employee of an organization.

Third party:

An individual or organization outside of Objective Financial Partners Inc.

Use:

The treatment, handling, and management of personal information by and within Objective Financial Partners Inc. or by a third party with the knowledge and approval of Objective Financial Partners Inc.



The Objective Financial Partners Inc. Privacy Code in Detail.

Principle 1 - Accountability

Objective Financial Partners Inc. is responsible for personal information under its control and shall designate one or more persons who are accountable for Objective Financial Partners Inc.'s compliance with the following principles.

- 1.1 Responsibility for compliance with the provisions of The Objective Financial Partners Inc. Privacy Code rests with the Objective Financial Partners Inc. Privacy Officer who can be reached at (416) 691-8471 x 1 or via jheath@objectivecfp.com. Other individuals within Objective Financial Partners Inc. may be delegated to act on behalf of The Objective Financial Partners Inc. Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.
- 1.2 Objective Financial Partners Inc. shall make known, upon request, the title of the person or persons designated to oversee Objective Financial Partners Inc.'s compliance with The Objective Financial Partners Inc. Privacy Code.
- 1.3 Objective Financial Partners Inc. is responsible for personal information in its possession or control. Objective Financial Partners Inc. shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.
- 1.4 Objective Financial Partners Inc. shall implement policies and procedures to give effect to The Objective Financial Partners Inc. Privacy Code, including:
 - (a) implementing procedures to protect personal information and to oversee Objective Financial Partners Inc.'s compliance with The Objective Financial Partners Inc. Privacy Code;
 - (b) implementing procedures to receive and respond to complaints or inquiries;
 - (c) training and communicating to staff about Objective Financial Partners Inc.'s policies and procedures; and
 - (d) developing information materials to explain Objective Financial Partners Inc.'s policies and procedures.

Principle 2 - Identifying Purposes for Collection of Personal Information

Objective Financial Partners Inc. shall identify the purposes for which personal information is collected at or before the time the information is collected.

- 2.1 Objective Financial Partners Inc. collects personal information for the following purposes (the "identified purposes"):
 - (a) to provide accounting, tax compliance, financial, tax, and estate planning, and related services requested by clients;



- (b) to establish, manage, and administer the client relationship (including intake, identity/ authorization verification, communicating with clients, scheduling, billing, record-keeping, and responding to inquiries);
 - (c) to comply with legal, regulatory, professional, and tax requirements (including retaining records as required by law);
 - (d) to maintain the security of our systems and information, prevent and investigate fraud or errors, and protect our business and clients; and
 - (e) other purposes permitted or required by law, or for which we obtain consent.
- 2.2 To send newsletters, tax alerts, service updates, and event invitations to clients and prospects where permitted by law, and to manage communication preferences (including opt-out unsubscribe), in accordance with applicable law (including Canada's anti-spam legislation).
- 2.3 Objective Financial Partners Inc. shall specify orally, electronically or in writing the identified purposes to the client or employee at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Objective Financial Partners Inc. who can explain the purposes.
- 2.4 When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the client or employee will be acquired before the information will be used or disclosed for the new purpose.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a client or employee are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual.

- 3.1 In obtaining consent, Objective Financial Partners Inc. shall use reasonable efforts to ensure that a client or employee is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the client or employee.
- 3.2 Generally, Objective Financial Partners Inc. shall seek consent to use and disclose personal information at the same time it collects the information. However, Objective Financial Partners Inc. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.



- 3.3 Objective Financial Partners Inc. may require clients to consent to the collection, use and/or disclosure of personal information as a condition of the supply of a product or service only if such collection, use and/or disclosure is required to fulfill the explicitly specified, and legitimate identified purposes.
- 3.4 In determining the appropriate form of consent, Objective Financial Partners Inc. shall take into account the sensitivity of the personal information and the reasonable expectations of its clients and employees.
- 3.5 The purchase or use of products and services by a client, or the acceptance of employment or benefits by an employee, may constitute implied consent for Objective Financial Partners Inc. to collect, use, and disclose personal information for the identified purposes.
- 3.6 A client or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Clients and employees may contact Objective Financial Partners Inc. for more information regarding the implications of withdrawing consent.
- 3.7 **Electronic Marketing Communications (CASL)**
Objective Financial Partners Inc. may send commercial electronic messages (e.g., newsletters and promotional emails) to clients and prospects **only with express consent, implied consent, or as otherwise permitted by applicable law**. Each message will identify the sender and include a clear unsubscribe mechanism. Unsubscribe requests will be processed **at no cost** and **within 10 business days**.
- 3.8 **Suppression List**
To respect opt-out requests, Objective Financial Partners Inc. may retain limited information (e.g., email address) on a suppression list to ensure no further marketing messages are sent to that address unless consent is later re-established.
- 3.9 Objective Financial Partners Inc. may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.
- 3.10 Objective Financial Partners Inc. may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a contravention of a law.
- 3.11 Objective Financial Partners Inc. may collect, use, or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.
- 3.12 Objective Financial Partners Inc. may use or disclose personal information without knowledge or consent to a lawyer representing Objective Financial Partners Inc., to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.



Principle 4 - Limiting Collection of Personal Information

Objective Financial Partners Inc. shall limit the collection of personal information to that which is necessary for the purposes identified by Objective Financial Partners Inc. Objective Financial Partners Inc. shall collect personal information by fair and lawful means.

- 4.1 Objective Financial Partners Inc. collects personal information primarily from its clients or employees.
- 4.1 Objective Financial Partners Inc. may also collect personal information from other sources including credit bureaus, employers, or personal references, or other third parties who represent that they have the right to disclose the information.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Objective Financial Partners Inc. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Objective Financial Partners Inc. shall retain personal information only as long as necessary for the fulfillment of those purposes.

- 5.1 Objective Financial Partners Inc. may disclose a client's or employee's personal information, as applicable and only where permitted, to:
 - (a) the **Canada Revenue Agency** and other tax authorities as necessary for tax compliance and filings;
 - (b) government authorities, regulators, or law enforcement where required or authorized by law (including court orders/subpoenas);
 - (c) **service providers** who help us deliver and support our services (for example: IT cloud hosting, secure document storage/sharing, e-signature, email/communications, bookkeeping/tax software, and shredding/destruction services), under contractual confidentiality and security requirements; and
 - (d) our professional advisors (e.g., legal, insurance) where necessary for advice or to protect our legal interests.

Objective Financial Partners Inc. does not sell personal information.

We do not disclose personal information to third parties for their **independent marketing** purposes.

- 5.2 Only Objective Financial Partners Inc.'s employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about clients and employees.



- 5.3 Objective Financial Partners Inc. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a client or employee, Objective Financial Partners Inc. shall retain, for a period of time that is reasonably sufficient to allow for access by the client or employee, either the actual information or the rationale for making the decision.
- 5.4 Objective Financial Partners Inc. shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased, or made anonymous.

Principle 6 - Accuracy of Personal Information

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

- 6.1 Personal information used by Objective Financial Partners Inc. shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a client or employee.
- 6.2 Objective Financial Partners Inc. shall update personal information about clients and employees as necessary to fulfill the identified purposes or upon notification by the individual.

Principle 7 - Security Safeguards

Objective Financial Partners Inc. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

- 7.1 Objective Financial Partners Inc. shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification, or destruction, through appropriate security measures, regardless of the format in which it is held.
- 7.2 Objective Financial Partners Inc. shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.
- 7.3 All of Objective Financial Partners Inc.'s employees with access to personal information shall be required to respect the confidentiality of that information.
- 7.4 **Privacy Breach Response**
Objective Financial Partners Inc. maintains procedures to identify, contain, investigate, and remediate privacy breaches involving personal information.

7.5 **Mandatory Notification and Reporting (PIPEDA)**

Where a breach of security safeguards creates a **real risk of significant harm** to an individual, Objective Financial Partners Inc. will **notify affected individuals** and **report the breach to the Office of the Privacy Commissioner of Canada** as soon as feasible, and will notify other organizations/government institutions where legally required or where such notice may reduce the risk of harm.

7.6 **Breach Records**

Objective Financial Partners Inc. will **keep a record of every breach** of security safeguards involving personal information (whether or not it meets the real-risk threshold) and will retain breach records for **at least 24 months**.

7.7 **Questions about a Breach**

Individuals may contact the Privacy Officer for information about our breach response process.

Principle 8 - Openness Concerning Policies and Procedures

Objective Financial Partners Inc. shall make readily available to clients and employees specific information about its policies and procedures relating to the management of personal information.

8.1 Objective Financial Partners Inc. shall make information about its policies and procedures easy to understand, including:

- (a) the title and address of the person or persons accountable for Objective Financial Partners Inc.'s compliance with The Objective Financial Partners Inc. Privacy Code and to whom inquiries and/or complaints can be forwarded;
- (b) the means of gaining access to personal information held by Objective Financial Partners Inc.;
- (c) a description of the type of personal information held by Objective Financial Partners Inc., including a general account of its use; and
- (d) a description of what personal information is made available to related organizations (e.g., subsidiaries).

8.2 Objective Financial Partners Inc. shall make available information to help clients and employees exercise control of the collection, use and/or disclosure of their personal information and, where applicable, privacy-enhancing services available from Objective Financial Partners Inc.

8.3 **Service Providers and Cross-Border Processing**

Objective Financial Partners Inc. may use service providers to process personal information on our behalf. PIPEDA does not prohibit cross-border processing; however Objective Financial Partners Inc. remains accountable for personal information transferred to third parties for processing, including, but not limited to cloud document storage, tax software, and e-signature platforms, and uses contractual or other measures to provide a comparable level of protection. Personal information processed outside Canada may be accessible to courts, law enforcement, or national security authorities in that jurisdiction.



Principle 9 - Client and Employee Access to Personal Information

Upon request, Objective Financial Partners Inc. shall inform a client or employee of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. A client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- 9.1 Upon request, Objective Financial Partners Inc. shall afford clients and employees a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.
- 9.2 In certain situations, Objective Financial Partners Inc. may not be able to provide access to all the personal information that it holds about a client or employee. For example, Objective Financial Partners Inc. may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Objective Financial Partners Inc. may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of the laws of Canada or a province.
- 9.3 Upon request, Objective Financial Partners Inc. shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, Objective Financial Partners Inc. shall provide a list of third parties to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.
- 9.4 In order to safeguard personal information, a client or employee may be required to provide sufficient identification information to permit Objective Financial Partners Inc. to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.
- 9.5 Objective Financial Partners Inc. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Objective Financial Partners Inc. shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.
- 9.6 Clients and employees can obtain information or seek access to their individual files by contacting the Objective Financial Partners Inc. Privacy Officer.



Principle 10 - Challenging Compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Objective Financial Partners Inc.'s compliance with The Objective Financial Partners Inc. Privacy Code.

- 10.1 Objective Financial Partners Inc. shall maintain procedures for addressing and responding to all inquiries or complaints from its clients and employees regarding Objective Financial Partners Inc.'s handling of personal information.
- 10.2 Objective Financial Partners Inc. shall inform its clients and employees about the existence of these procedures as well as the availability of complaint procedures.
- 10.3 The person or persons accountable for compliance with The Objective Financial Partners Inc. Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.
- 10.4 Objective Financial Partners Inc. shall investigate all complaints concerning compliance with The Objective Financial Partners Inc. Privacy Code. If a complaint is found to be justified, Objective Financial Partners Inc. shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A client or employee shall be informed of the outcome of the investigation regarding his or her complaint.
- 10.5 **Contacting the OPC**
If a client or employee is not satisfied with our response, they may file a complaint with the **Office of the Privacy Commissioner of Canada (OPC)**. Information about the OPC's complaint process is available on priv.gc.ca.

Additional Information

For more information regarding The Objective Financial Partners Inc. Privacy Code, please contact the Objective Financial Partners Inc. Privacy Officer at (416) 691-8471 x 1 or via jheath@objectivecfp.com.

Please visit the Office of the Privacy Commissioner of Canada (OPC) website at priv.gc.ca