



McIntosh Perry is committed to complying with applicable privacy laws in Canada, including the *Personal Information Protection and Electronics Documents Act* (the “Act”). The Act provides you with rights relating to the privacy of your personal information.

This Privacy Policy addresses and explains the ongoing commitment of McIntosh Perry to respect and protect the privacy and confidentiality of your personal information in our possession as well as that of our clients.

We want you to know why we need your personal information, how this information is collected, how we use and protect this information, and how it is disclosed.

What is considered personal information?

Generally, personal information means information about an identifiable individual, although it does not include the name, title or business address or telephone number of an employee of an organization.

Why do we collect personal information?

McIntosh Perry collects personal information about employees in the course of their employment; and about clients and potential clients in the course of conducting business. The kind of information we collect and use depends upon the type of service being provided. Whenever possible we collect your personal information from you directly. We will explain the reasons for collecting the information at that time, but generally we collect personal information for use and disclosure for the purposes of:

Clients	Employees
Providing services to you	Maintaining your employment and employee benefit files
Establishing and maintaining communications with you	Establishing and maintaining communications with you
Advising you of upcoming events	Paying you
Understanding your needs	Processing your security clearance
Providing information to you about developments in our industry	Maintaining training and professional development records
Determining if our services meet your needs	Complying with all applicable laws
Recommending and offering services that meet your needs or may be of interest to you	
Billing you for services rendered	
Collecting monies owed	
Fulfilling our professional obligations	
Complying with all applicable laws	

We limit the collection of personal information by McIntosh Perry to what is necessary for these purposes or other purposes that are discussed with you before or at the time the personal information is collected.

If you tell us that you no longer wish to receive correspondence at your personal addresses and phone numbers, we will not send any further materials.

Do we get your approval?

We collect, use and disclose your personal information with your consent or as permitted by PIPEDA. Your consent may be formally expressed (verbal or written) or implied depending on the circumstances. Implied consent arises when we can reasonably conclude that you have given consent by your action or inaction. Before deciding what form of consent is appropriate, McIntosh Perry will consider the sensitivity of the personal information we need, the reason for its use or disclosure and the type of contact that is involved.

By providing personal information to McIntosh Perry, you agree and consent that we may collect, use and disclose your personal information in accordance with this Privacy Policy. If you do not agree, we request that you do not provide any personal information to us.

The choice to provide McIntosh Perry with personal information is yours. If you do not consent to a certain use or disclosure of information, or if you withdraw your consent, we will explain the consequences of refusing or withdrawing consent, and your options.

Who do we share personal information with?

McIntosh Perry uses and discloses various types of personal information as necessary and appropriate for the purposes previously outlined. The disclosure of personal information may occur as part of McIntosh Perry fulfilling its obligations and/or conducting everyday business. This includes disclosure of personal information:

Clients	Employees
To experts, consultants or other firms we retain on your behalf	To third parties that provide products or services to McIntosh Perry, including consultants and software providers, only to the extent necessary to allow them to provide services to our company
To government agencies or regulatory bodies having jurisdiction to the extent they can oblige us to do so	To government agencies or regulatory bodies having jurisdiction to the extent they can oblige us to do so
To all other persons authorized or required by law to the extend they can oblige us to do so	To all other persons authorized or required by law to the extend they can oblige us to do so
When it is necessary to establish or collect monies owing to McIntosh Perry	To a person who, in the reasonable judgement of McIntosh Perry, is seeking information as your agent or attorney
When it is necessary to McIntosh Perry to pursue available remedies or limit any damages that McIntosh Perry may sustain	When you consent to such disclosure or it is otherwise permitted or required by law
To a person who, in the reasonable judgement of McIntosh Perry, is seeking information as your agent or attorney	
When you consent to such disclosure or it is otherwise permitted or required by law	

Personal information may be subject to transfer to another organization or person in the event of a merger or change of ownership of all or part of McIntosh Perry, but this will only occur if the parties have entered into an agreement under

which the collection, use and disclosure of the information is restricted to the purposes that relate to the business transaction, including a determination of whether to proceed with the business transaction.

Under no circumstances do we disclose your personal information to third parties to enable them to market their products or services to you without obtaining express consent from you.

Your personal information shall only be retained by McIntosh Perry for as long as is necessary for the fulfillment of the identified purposes. Some personal information may be kept indefinitely.

How is personal information protected?

McIntosh Perry is responsible for your personal information that is within our control and each of our employees is responsible for the personal information within his or her control. Our employees are informed about the importance of privacy and receive information periodically to inform them of our Privacy Policy. We have appointed a Privacy Officer who is accountable for our compliance with applicable privacy laws in Canada and with this Privacy Policy. Your personal information is secure with McIntosh Perry and we use safeguards and security measures that are appropriate to the sensitivity of the information to protect against non-authorized access, use, alteration, duplication, destruction, or disclosure of your personal information.

McIntosh Perry maintains personal information in a combination of paper and electronic formats. While recent paper records are kept at our offices, older records containing personal information may be stored at offsite storage facilities.

Our computer systems are constructed in such a way as to ensure that only authorized individuals can access secure systems and databases. If you send us an e-mail message containing personal information, please remember that e-mail is not necessarily secure against interception.

What is the process for getting information corrected or finding out what has been collected and how it has been shared and used?

McIntosh Perry endeavours to maintain personal information that is accurate, complete and up-to-date as is necessary for the purposes for which it is used and disclosed. We rely on individuals to inform us of any relevant changes. If you have any reason to believe your personal information in our control is inaccurate, please contact us by discussing the correction with your typical McIntosh Perry point of contact, or in writing to our Privacy Officer at the address listed below. We will investigate and, where appropriate, update our records accordingly.

We will give you access to the personal information we retain about you within a reasonable period of time.

We will investigate and respond to your concerns or complaints about our handling of your personal information and/or compliance with applicable privacy law or this Privacy Policy. If the issue is not resolved to your satisfaction, we will provide information on other complaint procedures that may be available to you.

Responsibilities of McIntosh Perry Staff

Employee of McIntosh Perry may be required to request and handle client's personal information in the course of doing business. They are responsible for being familiar with our Privacy Policy, which is posted on our external website, and

handling the collection and use of personal information appropriately. When collecting client personal information, company employees responsible for the following.

- Identifying the purposes of collecting the personal information;
- Limiting collection to only that which is required;
- Disclosing what the personal information will be used for;
- Obtaining client consent to collect and use the personal information;
- Ensuring personal information is safeguarded and disposing of it appropriately when it is no longer required; and
- Providing contact information for our Privacy Officer for clients to contact if they have a complaint or would like to make a request for information.

Who do you contact for more information or to file a complaint?

Whether you are an employee or a client, to stop the delivery of information to you or for further information about this Privacy Policy, to address any concerns you have, to review or verify your personal information in our control or to find out how we have used it or to whom we have disclosed it, please contact our Privacy Officer at privacy@mcintoshperry.com.

Amendments to Our Privacy Policy

We may add, modify or remove portions of this Privacy Policy at any time when we feel it is appropriate to do so. Policy changes will apply to information from the date of posting of the revised Privacy Policy to our website as well as to existing information held by McIntosh Perry.