

Scrivens Insurance and Investment Solutions is in business to provide you with a broad variety of insurance and financial services. To meet your needs and serve you well, Scrivens Insurance and Investment Solutions requires your personal information, the details of which can differ depending on the types of insurance and financial services you require.

You, as an individual, have a right to know how we collect, use and disclose personal information. You have a right to expect that, to the best of our ability, your personal information held by us remains accurate, confidential and secure.

Scrivens Insurance and Investment Solutions is proud of their reputations in maintaining the confidentiality and security of personal information. We provide the following information to explain how we protect the privacy of individual client's personal information.

THE NEED FOR CONFIDENTIALITY

As professionals we are committed to holding our clients' personal information in strict confidence, and we shall not disclose any such information unless authorized by our clients, required by law to do so, or required to do so in conducting negotiations with underwriters or insurers on behalf of the client.

Except as outlined below, a record is kept each time personal information is disclosed, noting the nature of the disclosure, the date and the identity of the party to whom the disclosure was made. Individual records of disclosure are not maintained for regular or routine actions such as transfers of information to insurers, underwriters and claims adjusters.

A copy of the brokerage's Privacy Declaration is available on request.

THE NEED FOR TRUST

Trust comes with confidence. The more you know about us, the more confident you can feel about dealing with Scrivens Insurance and Investment Solutions. Similarly, the more we know about you, the better we can serve you.

Scrivens Insurance and Investment Solutions collects and uses information about you for only the following purposes:

- To understand your needs.
- To analyze the suitability of our insurance and financial products or services for you.
- To determine your eligibility for our products and services.
- To set up, manage and offer products and services that meet your needs.
- To provide you with ongoing service.
- To meet our legal and regulatory requirements.
- To facilitate the underwriting process and insurance claims.

Because it is important that we keep your trust, we will only ask for information which we need and when we ask you for information, we'll let you know why we need it.

Subject to legal and contractual requirements, you can refuse to consent to our collection, use or disclosure of information about you, or withdraw your consent to our further collection, use or disclosure of information at any time by giving us reasonable notice.

If you refuse or withdraw your consent to the collection, use or disclosure of information about you, we may not be able to provide or continue to provide you with some products, services or information of value to you.

With your consent and where the laws allow, a broker may share your personal information (other than health information) with other brokers within the brokerage so that they may directly tell you about their products and services.

THE NEED FOR ACCURACY

While Scrivens Insurance and Investment Solutions tries to ensure that the information we hold about you is accurate, complete and up-to-date, it is in your obligation to inform your broker, promptly of a change of name, address or any other relevant information.

If you believe that personal information in your records may be inaccurate, we make it easy for you to access, verify and update it. If information has been provided to third parties, we will convey the corrected information to them, if necessary.

If we do not agree to change your personal information, you may challenge our decision. We will make a record of this challenge and, if necessary disclose the challenge to third parties who also possess the information.

THE NEED FOR ACCESS

To review the personal information, which Scrivens Insurance and Investment Solutions has about you, simply notify your account manager. Basic personal information can be verified on the spot, at no charge.

If you wish to review more extensive information, you'll be asked to provide details regarding the nature of the information you wish to check.

The information will be obtained from our files and will normally be provided within 30 days of your request. There may be a charge for retrieving this information, in which case you will be notified in advance and may, if you like, withdraw your request. You may also challenge the reasonableness of the charge.

Sometimes we may not provide you with information about you that is within our control. This can occur if your right of access is constrained pursuant to the provisions of the Federal Personal Information Protection and Electronic Documents Act.

For example, we will not provide you with personal information in our control if:

- It would reveal personal information about another party and your personal information cannot be separated.
- The information is subject to solicitor/client or litigation privilege.
- It contains the brokerage's confidential commercial or proprietary information, or if it cannot be disclosed for legal reasons.

- The information is used for the detection and prevention of criminal activity and dealings in the proceeds of crime.

If we deny your request for access to personal information, you will be told why, unless prohibited by law. You may challenge that decision.

Once you have the information, all you must do is check it for accuracy and let us know if there are any corrections required. We will correct our records or make note of any differences. If information has been provided to third parties, we will convey the corrected information or the note of any differences to them, if necessary.

THE NEED FOR SECURITY

Every Scrivens employee, as a condition of employment, takes responsibility for protecting client privacy, confidentiality and security. This obligation remains in effect even after an employee leaves the Scrivens office.

Suppliers of services to the brokerage such as software vendors are required to sign contracts obligating them to protect the privacy and confidentiality of personal information provided to them to enable them to perform their function.

Appropriate controls are in place over computer systems and data processing procedures and these controls are reviewed on an ongoing basis to ensure compliance with our security and privacy policies.

The brokerage destroys or erases any personal information when it is no longer needed. When information is destroyed or erased, the brokerage takes care that there is no unauthorized access.

In short, our people are committed, and our systems are designed, to protect your privacy and confidentiality.

QUESTIONS OR CONCERNS

Questions or concerns about personal information held by the brokerage, or brokers compliance with the Brokerage Privacy Code, can be answered readily by the brokerage privacy officer who can be reached at (613) 236-9101. However, should the privacy officer be unable to resolve your concerns you may contact the:

Federal Privacy Commissioner
112 Kent Street
Ottawa, Ontario
K1A 1H3
Tel: 1-613-995-8210
Toll free: 1-800-282-1376