PARTNERS IN PLANNING

Privacy Policy

Protecting privacy and maintaining the confidentiality of personal information has always been integral to the way we do business at Partners In Planning Financial Group Ltd. ("PIPFG") and at our affiliated companies Partners In Planning Financial Services Ltd. ("PIPFS") and Partners In Planning Insurance Services Inc. ("PIPIS"). We continue to protect privacy and an individual's right to control the collection, use and disclosure of his or her personal information. We have procedures in place that guide Partners In Planning employees and Advisors in maintaining confidentiality. PIPFG and its affiliates have adopted the Investment Funds Institute of Canada (IFIC) Privacy Code, established related policies and procedures, and appointed a Privacy Officer. Our employees understand the importance of the policies and procedures and follow them carefully. Privacy protection is essential to providing excellent service.

Our Privacy Principles:

Our Privacy Principles comply with the provisions of Canada's *Personal Information Protection and Electronic Documents Act (PIPEDA)*. These principles are as follows:

Principle 1: *Accountability.* PIPFG is responsible for maintaining and protecting the personal information we collect.

Principle 2: *Identifying Purposes.* The purpose for which personal information is being collected will be explained either before or when it is collected.

Principle 3: *Consent.* PIPFG will obtain consent to collect, hold, use and disclose personal information. This is done by providing a Privacy Protection Notice when an account is first opened or alternatively if an account currently exists by providing notice in a separate communication.

Principle 4: *Limiting Collection*. PIPFG will limit the information collected to what is needed for those purposes PIPFG has identified. We list these identified purposes in the section entitled "How Do We Use Personal Information."

Principle 5: *Limiting Use, Disclosure and Retention.* PIPFG will use and disclose information only for the purposes identified, or when it is required or permitted by law. We retain information only for as long as is necessary for the fulfillment of these purposes.

Principle 6: *Accuracy.* PIPFG keeps personal information as accurate, complete and up to date as is necessary for these purposes.

Principle 7: *Safeguards.* PIPFG protects personal information from unauthorized access, disclosure and use with appropriate safeguards and security measures.

Principle 8: *Openness.* Upon request, PIPFG will provide specific details about PIPFG information handling policies and procedures.

Principle 9: *Access*. PIPFG will provide access to the personal information collected. An individual may check the accuracy of his or her personal information and request that it be amended as appropriate.

Principle 10: *Challenging Our Compliance.* PIPFG will investigate and respond to concerns about any aspect of our handling of personal information.

How We Collect Personal Information

The information collected is retained in the "Client Record." Most of this information is provided by the client or his or Partners In Planning Advisor when a product or service application form is completed or an account is opened.

Information We Collect

The personal information in a Client Record may include a client's name, address, telephone number, Social Insurance Number, birth date, driver's license, passport number, medical information, income, net worth, account holdings and the name, address and Social Insurance Number of a client's spouse and/or beneficiary. Depending on the investment or service requested, additional personal information may be held in a Client Record. For example, if a pre-authorized payment plan is established, a financial institution account number is recorded, or if completing an insurance application, personal health information may also be held in the Client Record. Partners In Planning is required by law to collect Social Insurance Numbers to facilitate required tax reporting to the Canada Revenue Agency.

How We Use Personal Information

PIPFG may use personal information for the following identified purposes:

- Identifying individuals and ensuring the accuracy of information in the Client Record;
- Establishing, administering and servicing all accounts;
- Determining, maintaining, recording and storing account holdings and transaction information in a Client Record;
- Executing transactions or processing applications, including transferring funds by electronic or other means;
- Providing clients and their Partners In Planning Advisor with account statements and other account or policy information which may be requested in order to service an account;
- Protecting clients, Partners In Planning Advisors and PIPFG against error and fraud;
- Meeting the legal and regulatory requirements of various statutes including provincial securities legislation and federal money laundering regulations; and
- Verifying information previously given by a client with any other organization when necessary for the purposes provided in this policy.

Who We Collect Information From

There are times when information is collected from a third party. This information is only used for the purposes identified within this policy. These parties include:

- A Partners In Planning Advisor;
- Other financial institutions, mutual fund companies and life insurance companies; and
- Other companies within the Partners In Planning group of companies and third parties who represent that they have a legal right to disclose the information, for example, the Executor of an estate.

Who We Disclose Information To

There are times when we may disclose your information to Partners In Planning Advisors, suppliers or other organizations. This information is only used for the identified purposes. These Advisors, suppliers and organizations include:

- A PIPFS or PIPIS Advisor;
- Other financial institutions, mutual fund companies and life insurance companies;
- Other companies within the Partners In Planning group of companies;
- Canadian governments and government agencies;
- Canada Post; and
- Account statement preparation and mailing companies, courier companies, imaging companies and document storage companies.

For regulatory purposes, self regulatory organizations such as the Mutual Fund Dealers Association of Canada, of which we are a member, require access to personal information of current and former clients, employees, representatives, directors, officers, partners and others that has been collected or used by regulated persons. These self regulatory organizations collect, use or disclose such personal information obtained from regulated persons for regulatory purposes, including:

- Surveillance of trading-related activity;
- Sales, financial compliance, trade desk review and other regulatory audits;
- Investigation of potential regulatory and statutory violations;
- Regulatory databases;
- Enforcement or disciplinary proceedings;
- Reporting to securities regulators; and
- Information sharing with securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

Sharing information with these third parties is essential to providing excellent service. When Partners In Planning transfers personal information to third parties, for example mailing companies, we ensure by contractual means that the transferred personal information is used only for the purposes for which the third party is retained.

Disclosing Information When Required or Permitted By Law

PIPFG must provide information in response to a valid demand, search warrant or other legally valid inquiry or order. We may disclose information to an investigative body in the case of a breach of an agreement or contravention of laws. We may also disclose information to help PIPFG collect a debt owed by a client.

How We Obtain Consent

A Privacy Protection Notice (see New Client Information booklet) is provided at the time a Partners In Planning product or service application form is completed or an account is otherwise established. The Privacy Protection Notice may also be sent in a separate communication. The Privacy Protection Notice explains how we collect, hold, use and disclose personal information. By completing and signing a New Account Application Form/Know Your Client (NAAF/KYC) form and continuing to do business with Partners In Planning and our Advisors, an individual is consenting to the use of personal information.

PIPFG may possess personal information that we collected prior to implementation of our current Privacy Policy, for which we do not yet have express or implied consent to use. We will continue to use that information for the purposes set out in this policy, unless requested in writing to stop using that information. This is considered implied consent. Personal information will not be shared with sales representatives of any other company without express consent.

How To Withdraw All or Partial Consent

Withdrawal of consent for Partners In Planning's use of personal information can be done by contacting Partners In Planning's Privacy Officer at 1-877-967-4357 (Ext. 4453) or e-mail: privacy@pipfs.com.

In some circumstances, legal requirements may prevent an individual from withholding consent. A decision to withhold personal information or consent may also prevent Partners In Planning from opening an account or it may limit the products or services we are able to provide. The collection of personal information and its disclosure to certain third parties is a necessary and, in certain instances, a legally required part of making the product or service available to clients.

Right To Access Information

Except in limited circumstances, we can provide the information we have in a Client Record to the client in order to verify and amend it. We will provide requested information within 20 days of receipt of a written request, unless prohibited by law. Please note that we may not be able to provide personal information in the following circumstances:

- If it contains references to other persons and the references are subject to legal privilege;
- If it contains confidential information proprietary to the Partners In Planning group of

companies;
- If it relates to an investigation of a breach of agreement or contravention of laws; or
- If it cannot be disclosed for other legal reasons.

Keeping Information Accurate

Accuracy is essential to providing excellent service. PIPFG is to be informed of any errors in a Client Record as soon as possible so that we may immediately correct the Client Record. If the accuracy of information is in dispute, we will note it in the Client Record.

Where We Keep Information

The Client Record is kept in electronic or paper format at the offices of PIPFG and Partners In Planning Advisors. Paper records forming part of a Client Record may also be kept in offsite storage. The Client Records may be transferred to other locations for disaster recovery purposes.

How We Protect Information Against Loss and Unauthorized Access

Partners In Planning employees, Advisors and third party service providers have access to personal information provided the information is required for the identified purposes, and access is permitted only to the extent necessary for such purposes.

In addition, we have taken several measures to protect information, such as restricting physical access to our offices and using computer passwords and file encryption for online activities and electronic storage.

Email transmissions between a client and a PIPFG Advisor are generally sent unencrypted and consequently may be intercepted or received by “hackers” or other unauthorized persons.

PIPFG representatives may only send unencrypted email transmissions containing client personal information to clients after first obtaining the client’s expressed written consent to do so.

How Long We Keep Information

We retain information only as long as it is required for the reasons it was initially collected and legal statutory requirements. The length of time we retain information varies depending on the product or service and the nature of the information. This period may extend beyond the end of an individual’s relationship with PIPFG but only for so long as it is legally necessary for us to have sufficient information to respond to any issues that may arise at a later date.

Password Protection

In order to ensure the overall protection and privacy of personal information, under the guidelines of the PIPEDA, Partners In Planning will exercise the following policy in regards to the distribution of password information for the dealer and Managing General Agency (MGA) back office systems:

- New User Password Requests—When a new user is set up on the dealer and/or MGA back office system, the log-in and password information will only by forwarded via email to the person for whom the system access is established. It must be clear that the email address being used belongs to the person who has made the request for system access. This information will be forwarded in two emails, with the log-in information being separate from the password.

- Request for Password Resets—When a request is received for a password to be reset on the dealer and/or MGA back office system, the PIP employee processing this request will make best effort to ensure that the changes are being provided to the appropriate user of the system based on the user ID. Should the request for password reset be made by someone other than the system user, the new password information will be forwarded via email to the person for whom the system access is established. It must be clear that the email address being used belongs to the person who has a user ID set up on the back office system.

Resolving Concerns

For any questions, concerns or complaints about the treatment of personal information, please follow these steps:

Step 1 In most cases, a concern is resolved simply by discussing it with the appropriate Partners In Planning Advisor.

Step 2 If concerns have not been resolved at that point, please contact:

Privacy Officer
Partners In Planning Financial Group
700, 2010 – 11th Avenue
Regina, Saskatchewan S4P 0J3
Phone: 1-877-967-4357 (Ext. 4453)
Fax: 306-347-4498
Email: privacy@pipfs.com

Step 3 If after contacting the PIPFG Privacy Officer concerns remain unresolved, contact may be made to the following:

Mutual Fund Dealers Association of Canada (MFDA)
121 King Street West, Suite 1000
Toronto, Ontario M5H 3T9
Phone: 416-361-6332 or 1-888-466-6332
www.mfda.ca

The Privacy Commissioner of Canada
112 Kent Street
Place de ville, Tower B, 3rd Floor
Ottawa, Ontario K1A 1H3
Phone: 613-995-8210 or 1-800-282-1376
www.privcom.gc.ca

Or in Quebec **The Commission d'acces a l'information**
575, rue Saint-Amable
Bureau 1.10
Quebec City, Quebec G1R 2G4
Phone: 418-528-7741 or 1-888-528-7741
www.cai.gouv.qc.ca

Questions About Privacy

For any questions about how PIPFG handles personal information, please contact:

Privacy Officer
Partners In Planning Financial Group
700, 2010 – 11th Avenue, Regina, Saskatchewan S4P 0J3
Phone: 1-877-967-4357 (Ext. 4453)
Fax: 306-347-4498
Email: privacy@pipfs.com

Partners In Planning or the Partners In Planning group of companies includes Partners In Planning Financial Group Ltd., Partners In Planning Financial Services Ltd., Partners In Planning Insurance Services Inc. and any affiliate or successor company of each of them. Personal information may be disclosed to Partners In Planning affiliates provided that such disclosure relates to one of the identified purposes in this policy.

Partners In Planning appreciates your business and promises to handle any questions or input regarding personal information in a prompt and courteous manner.