



ABEX CENTRAL FINANCIAL SERVICES LTD.
PRIVACY POLICY – 2006
(revised July 26, 2013)

1.0 GENERAL

- 1.1 Protecting your privacy and maintaining the confidentiality of your personal information has always been integral to the way we do business at ABEX Central Financial Services Ltd.
- 1.2 To learn more about ABEX Central Financial Services Ltd. Privacy Policy, you may access it through our website at www.abexgroup.ca

2.0 OUR TEN PRIVACY PRINCIPLES

- 2.1 Our ten privacy principles comply with the provisions of Canada's Personal Information Protection and Electronic Documents Act. These principles are as follows:

Principle 1: Accountability. We are responsible for and will endeavor to maintain and protect the information we have about you.

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

Principle 3: Consent. We will obtain your consent to collect, hold, use and disclose your information.

- 2.2 *Principle 4: Limiting Collection.* We will limit the information we collect to what is needed for those purposes ABEX Central Financial Services Ltd. has identified. We list these identified purposes in section 3.3.

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

Principle 6: Accuracy. We keep your information as accurate, complete and up to date as is necessary for these purposes.

Principle 7: Safeguards. We protect your information with appropriate safeguards and security measures.

Principle 8: Openness. Upon your request, we will provide you with specific details about our information handling policies and procedures. Section 8.0 provides you with details on who to contact when you have questions regarding your privacy.

Principle 9: Access. We will give you access to the information we have about you. You may check the accuracy of your information and amend it as appropriate.

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

3.0 COLLECTION OF INFORMATION

3.1 **How do we collect information?**

The information collected about you is retained in the “client record”. You provided most of this information when you completed your applications.

3.2 **What information do we collect?**

The personal information in your client record may include your name, address and telephone number, social insurance number, birth date, account holdings, health information, and information regarding your dependants as well as the name, address and social insurance number of your spouse and beneficiary.

Depending on the service you require additional personal information may be held in your client record.

3.3 **How do we use your information?**

We may use your information for the following *identified purposes*:

- Identifying you
- Ensuring the accuracy of information in your client record
- Establishing and administering your account
- To recommend suitable products
- Determining, maintaining, recording and storing account holdings and transaction information in your client record
- Executing transactions through ABEX Central Financial Services Ltd.
- Providing product information, mailings, transaction confirmations and other information which may be requested as needed to service your account
- Meeting legal and regulatory requirements
- Verifying information you have previously given with another organization when necessary for the identified purposes

3.4 **Who else do we collect information from?**

There are times when we may collect information about you from a third party. This information is only used for the identified purposes mentioned in section 3.3. The parties include:

- Insurance or financial advisor/investment representatives
- Financial institutions, mutual fund companies, life insurance companies
- Product suppliers
- Other companies in the ABEX Group of Companies
- Third parties who represent that they have a legal right to disclose the information, for example the executor of an estate

4.0 DISCLOSURE OF INFORMATION

4.1 **Who do we disclose your information to?**

There are times when we may disclose your information to suppliers or other organizations. This information is only used for the identified purposes in Section 3.3. These suppliers and organizations include:

- Insurance or financial advisors/investment representatives
- Financial institutions, mutual fund companies, life insurance companies
- Other companies in the ABEX Group of Companies
- Product suppliers
- Canadian governments and government agencies
- Canada Post
- Mailing companies, courier companies, imaging companies and document storage companies

4.2 When ABEX Central Financial Services Ltd. transfers personal information to its agents, for example, mailing companies, we ensure by contractual means that the transferred personal information is used only for the purposes for which the agent is retained.

4.3 **Disclosing your information when required or permitted by law**

ABEX Central Financial Services Ltd. must provide information in response to a valid demand, search warrant or other legally valid enquiry 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 us collect a debt owed by you.

5.0 CONSENT

5.1 **How do we obtain consent?**

Agreements, Applications and Disclosure documents explain how we collect, hold, use and disclose your information. By signing an application form and/or continuing to do business with us, you are consenting to the use of your information.

5.2 **How can you withdraw all or part of your consent?**

You can withdraw your consent to ABEX Central Financial Services Ltd. use of your information by contacting us. For contact information see section 8.0. In some circumstances, legal requirements may prevent you from withholding consent. Your decision to withhold information may also limit the products or services we are able to provide to you.

6.0 YOUR RIGHTS

6.1 **Your right to access your information**

Except in limited circumstances, we can provide you with the information we have about you so you may verify and amend it. We will provide you with an estimate of the cost to supply the information, and upon acceptance of the cost, requested information will be delivered to you within 30 days of receipt of your request, unless prohibited by law. Please note that we may not be able to provide you with your 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 ABEX Group of Companies
- ❑ If it relates to an investigation of a breach of agreement or contravention of laws
- ❑ If it cannot be disclosed for other legal reasons

7.0 KEEPING YOUR INFORMATION

7.1 **Keeping your information accurate**

Please inform us of any errors in our information about you as soon as you are aware of them so that we may immediately correct your client record. If the accuracy of information is in dispute, we will note it in your client record.

7.2 **Where do we keep our information?**

Your client record is kept in electronic or paper format at the office of ABEX Central Financial Services Ltd. Paper records forming part of your client record may also be kept in off-site storage. Your client record may be transferred to other locations for disaster recovery purposes.

7.3 **How do we protect your information against loss and unauthorized access?**

Our employees and service providers have access to your 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 your information, such as restricting physical access to our offices and using computer passwords and file encryption for on-line activities.

Information in Transit

Paper files, computer laptops, and all portable electronic devices, (including smartphones) that contain personal information must be kept in a secure environment at all times.

- While at the ABEX office and not in use, a secure environment means not in a public area and under separate lock and key
- While outside the ABEX office paper files and all electronic devices will also be kept in a secure environment under separate lock and key
- All portable electronic devices must be password protected
- Paper files, computer laptops, smart phones, and all portable electronic devices should never be left in an automobile unattended.

7.4 **How long do we keep your information?**

We retain your information only as long as it is required for the reasons it was collected. 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 your relationship with us 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.

8.0 WHAT IS A PRIVACY BREACH

A privacy breach occurs when there is unauthorized access, collection, use or disclosure of personal information. This happens when personal information is stolen lost or mistakenly disclosed (e.g. a computer or cell phone containing personal information is stolen or lost).

8.1 **Key Steps in Responding to a Privacy Breach**

- Containment and preliminary assessment
- Evaluation of the risks associated with the breach
- Notification- ABEX Central Financial Services Ltd Compliance Officer is to be notified immediately
- Prevention

For more information contact the Office of the Privacy Commissioner (PIPEDA) at:

www.priv.gc.ca/information/guide

9.0 RESOLVING YOUR CONCERNS

9.1 **If you have any questions, concerns or complaints about the treatment of your information contact:**

STEP 1 Richard Tremblay, President and Director of Compliance.
ABEX Central Financial Services Ltd.
41 King Street, Unit # 1
Barrie, Ontario L4N 6B5

Telephone: (705) 733-2239 Ext 102
Email: richard@abexgroup.ca

STEP 2 If your concerns have not been resolved to your satisfaction please contact the Privacy Commissioner of Canada:

The Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario K1A 1H3

Telephone: (613) 995-8210
Telephone: (800) 282-1376