



Personal Information Protection and Electronic Documents Act, RSC

Effective January 1, 2004

Under this legislation, we are required to establish a privacy policy and maintain safeguards to ensure that personal information is secure, used and disclosed only for those purposes for which it was collected. Our Privacy Notice Statement is attached.

Under our privacy policy, we are required to obtain your consent regarding the collection, use and disclosure of your personal information. By submitting your personal information to us, you are consenting to its collection, use and disclosure in accordance with our Privacy Notice Statement. If at any time you wish to withdraw your consent, please communicate in writing addressed to:

Privacy Officer
Sloan Group
7620 Yonge Street, Suite 400
Thornhill, ON
L4J 1V9



Privacy Policy Statement

Sloan Partners LLP and its affiliated organizations Infologix Inc. and Infonumerix Inc. ("Sloan Group") recognize that protecting your privacy is one of the cornerstones of our business. We are committed to protecting your privacy and safeguarding your personal, business and financial information. We support a general policy of openness about how we collect, use, disclose and protect your personal information. Our policies have been designed to meet your needs and to conform to The Personal Information Protection and Electronic Documents Act, which is Federal legislation.

Regardless of how the range of products and services we offer our clients expands and the technology we use changes, we will always strive to protect the privacy of your personal information, subject to any consent an individual has provided for its use.

Our policies are based on the Canadian Standards Association Model Code for the Protection of Personal Information. In addition our partners and staff are governed by the rules of professional conduct of the following bodies:

The Institute of Chartered Accountants of Ontario
The Society of Management Accountants of Ontario
The Certified General Accountants Association of Ontario
The American Institute of Certified Public Accountants
The Financial Planners Standards Council of Canada

Personal Information

Personal Information is any information about an identifiable person, other than the name, title, business address and business telephone number of a person. It includes such things as a person's home address, date of birth, social insurance number, medical and financial information.

Why We Gather Personal Information

The Sloan Group collects personal information only for the following reasons:

- To provide you with the products or services that you have requested and to maintain commercial relations with you;
- To better understand your needs and recommend products and services and identify opportunities that might be of value to your business or personal affairs;
- To manage our business which includes partnership and employment matters;
- To meet legal and regulatory requirements.

We will not use your personal information for any other reason without your consent.

Sharing of Information

We will share your information with third parties only to assist us in completing the work we perform for you, or as we are required to by law. Any third parties must adhere to our privacy policies.

Our policies are based on the principles set out in the MODEL CODE FOR THE PROTECTION OF PERSONAL INFORMATION, CAN/CSA-Q830-96. These are:

1. Accountability

We have appointed a senior member of our organization to be responsible for compliance with the law and for training staff in its requirements.

2. Identifying Purposes

We identify the purpose for collecting information before collecting it, unless the purpose is obvious. For example, we cannot prepare your tax return and submit it on your behalf without obtaining your Social Insurance Number and providing it to CRA.

3. Consent

We will only collect personal information with your prior knowledge and consent, unless this is impracticable or impossible in the circumstances.

4. Limiting Collection

We will only collect the information we need for the purposes stated in the Privacy Statement. All information collected shall be collected by fair and lawful means.

5. Limiting Use, Disclosure and Retention

We will use or disclose personal information only for the purpose of collection unless we receive consent or are required by law.

We will retain the information only as long as it is required and we will safely destroy the information when it is no longer required.

6. Accuracy

We will use our best efforts to ensure that the information we gather is accurate, complete and is kept up-to-date as may be required.

7. Safeguards

We will safeguard your information against unauthorized access, disclosure, copying, use or modification in a manner appropriate to the sensitivity of the information.

8. Openness

We will make available specific information about our policies and practices relating to the management of personal information readily available to those individuals who are, or may be, affected by the personal information we collect.

9. Individual Access

Upon request, we will inform an individual of the existence, use and disclosure of their personal information. We will provide such individuals reasonable access to their information and correct any personal information if its accuracy and completeness is challenged and found to be deficient. There are limited exceptions to this access, which are set out in the legislation.

10. Provide Recourse

We will investigate all complaints. Complaints must be made in writing to:

Privacy Officer
Sloan Group
7620 Yonge Street, Suite 400
Thornhill, ON
L4J 1V9

or to

privacy@sloangroup.ca

If we do not resolve the issue to your satisfaction you may contact:

The Privacy Commissioner of Canada
112 Kent St
Ottawa, ON.
[K1A 1H3](#)