

RLB LLP Privacy and Data Policy

THE ACCOUNTING FIRM OF RLB LLP knows how important your privacy is to you. Our commitment to our clients and others is to respect and protect the privacy and confidentiality of personal and business information that is entrusted to us in the course of rendering services to our clients. As Chartered Accountants we are governed by the Institute of Chartered Accountants of Ontario Rules of Professional Conduct, which have always and will continue to protect the privacy and confidentiality of your personal information.

For these reasons, we have created the following privacy and data policy. It confirms our commitment to protecting your privacy and maintaining the trust that you have placed in our accounting firm. In this privacy and data policy we explain how we collect and use personal information and your rights related to its collection and use.

1. ACCOUNTABILITY

Our firm is responsible for the personal information collected and maintained by it and which is under its control. In order to fulfill this responsibility:

- I. We have designated an official to be responsible for the day-to-day care and control of personal information;
- II. Our firm has taken the following measures to ensure compliance with this Privacy Policy:
 - a. Developed procedures to protect personal information;
 - b. Developed procedures to receive and respond to complaints and inquiries;
 - c. Trained our staff on our policies and practices with respect to personal information; and
 - d. Developed and distributed information to our staff and the general public explain our policies and procedures.

2. OUR PURPOSE FOR COLLECTING PERSONAL INFORMATION

Our firm collects personal information for the following limited purposes:

- I. To assist us in providing services pertaining to the preparation of your financial statements;
- II. For the preparation of your taxation and other returns as required for various governmental and other regulatory purpose;
- III. To advise and assist you with personal and financial planning, retirement and succession planning, and other business and personal advisory services;
- IV. To understand your needs and determine the suitability of other services we may be able to offer you; and
- V. To share, as reasonably required, for the purposes stated above, within our group of businesses.

3. CONSENT

Our firm is committed to ensuring that you are aware of how your personal information is used. We will not collect, use, or disclose your personal information without your consent. By providing us with your personal information for the purposes listed above, you consent to our collection and use of the information for those purposes. With respect to personal information that you provide for the preparation of your tax and other returns, you consent to our transmitting such personal information to the appropriate government or regulatory authorities.

If we wish to collect your personal information for purposes other than as stated above, we may request that you consent, verbally or in writing, to such collection. If we wish to use personal information that we have already collected, for a purpose other than as stated above, then we will first seek your consent to such use.

We may periodically request written confirmation from you to ensure that the personal information collected and maintained by us is up-to-date and accurate. We also may ensure that we have your continuing consent to the use and retention of your personal information.

You have the right to refuse or withdraw your consent to the collection, use, and disclosure of your personal information. In some cases such refusal or withdrawal may prohibit or adversely affect the completion of our professional engagement. We will advise you if that is the case.

Our firm will disclose your personal information, for other than the purposes stated above, only if required to do so by law. We will notify you of such disclosure and provide you with the reason that obligates us to release the personal information.

4. LIMITING COLLECTION

Our firm restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

For this reason, our firm does not indiscriminately collect personal information. We collect personal information to fulfill the above-noted purposes only, and for no other purposes.

5. LIMITING USE, DISCLOSURE AND RETENTION

Our firm does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received. We retain personal information only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected.

6. ACCURACY

Our firm is committed to maintaining accurate, complete and up-to-date personal information. If you are aware of changes to the personal information you have given to us, simply inform us of the changes and we will update our records accordingly.

You may check and correct your personal information by contacting our firm and the official assigned to oversee the day-to-day care and control of personal information by writing or emailing your request to the address set out in Appendix 1 below.

7. SAFEGUARDS

Our firm has developed and implemented security safeguards appropriate to the sensitivity of the personal information kept by us. These security safeguards include:

- I. Physical security measures, such as locked cabinet storage and restricted access to areas where personal information is stored; and
- II. Internal employee security measures, including restricted computer access, employee confidentiality agreements, and limited access to where personal information is stored;
- III. We have taken and will continue to take appropriate security measures to protect the confidentiality of electronically transferred personal information. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not guarantee, and you should not expect, that your personal information, searches, or other communications will always remain secure. Users should also take care with how they handle and disclose their personal information and should avoid sending personal information through insecure means.

Each and every one of our employees, partners and associates is responsible for maintaining the confidentiality and security of all personal information to which they have access. Our employees are trained to know and respect our privacy policy, and compliance with our policies and procedures for protecting personal information is a condition of their employment.

Personal information kept by us is disposed of or destroyed once it is no longer needed to meet the purposes for which it was collected. If at any point you wish for us to delete information about you, you can do this by contacting in writing to the address set out in Appendix 1.

8. OPENNESS

Our firm makes information about its policies and practices respecting the collection and maintenance of personal information available to all interested parties.

We are pleased to answer questions that you may have regarding the collection and maintenance of personal information. Please forward questions in writing or email to the address set out in Appendix 1 below.

9. INDIVIDUAL ACCESS

You can request access to your personal information held by us. However, we reserve the right to confirm the identity of the person seeking access to personal information before complying with access requests. In order to comply with your request, we may ask you to provide us with some additional information that we will use to verify your identity. If you fail to provide

such information and the information that you have already given to us is not sufficient to identify you, we may refuse to provide you with information. Please forward your access request in writing or email to the address set out in Appendix 1 below.

Upon verified request, we will inform you if we have your personal information in our care and control, as well as providing you with the details of such personal information in responding to your request.

We are also committed to ensuring that the personal information that is collected and maintained by us is correct, accurate and complete.

11. DATA STORAGE AND SERVICES

In the interest of facilitating our services, we may communicate by facsimile transmission, send data over the Internet, store electronic data via computer software applications hosted remotely on the Internet, or allow access to data through third-party vendors' secured portals or clouds. Electronic data may be transmitted or stored using these methods.

We may use third-party service providers to store or transmit this data, such as providers of tax return preparation software and digital delivery of files. In using these data communication and storage methods, our firm employs measures designed to maintain data security. RLB adheres to industry standards in efforts to keep such communications and data access secure in accordance with our obligations under applicable laws and professional standards. We also require all of our third-party vendors to do the same

12. CHALLENGING COMPLIANCE

Our firm has designated an official who is responsible for the day-to-day care and control of personal information. This official will receive and respond to all information requests regarding our privacy policies or about your personal information under our care and control. Equally, if you wish to be added or removed from any of the lists RLB LLP maintains, please write or email your request to this official.

We investigate all complaints received by us and will respond in writing in a reasonable time frame. If a complaint is found to be justified, then we will take appropriate measures to resolve the matter.

13. CHANGES TO THE PRIVACY POLICY

We constantly review our Privacy Policy and strive towards making it better. That is why we reserve the right to amend this Policy at any time. We will not reduce any of your rights stated in this Privacy Policy without asking for your explicit prior consent to the changes. Each amendment to the Privacy Policy will be signed with the date of publishing and will be effective since that date. You can access previous version by request, see Appendix 1.

APPENDIX 1

HOW TO ADD, REMOVE OR AMEND YOUR PERSONAL INFORMATION

If, at any time, you wish to amend your personal information with us or remove your name from our mailing, or newsletter mailing lists, simply inform us in writing at either of the addresses below or by e-mail at privacyofficer@rlb.ca.

197 Hanlon Creek Boulevard, Unit 103

Guelph, Ontario

N1C 0A1

Tel: (519) 822-9933

Fax: (519) 822-9212

686 St. David Street North

Fergus, Ontario

N1M 2K8

Tel: (519) 843-1320

Fax: (519) 843-3289

650 Riverbend Drive Suite

Kitchener, Ontario

N2V 2C9

Tel: (519) 884-4445

Fax: (519) 884-3858

TOLL FREE: 1-866-822-9992