

RLB LLP Privacy and Data Policy

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Version: 5.0

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 Chartered Professional Accountants of Ontario Code 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.

If you have any questions regarding this Privacy Policy, you can reach our privacy office by email at privacyofficer@rlb.ca. You can also contact us by mail at:

RLB LLP ATTN: PRIVACY OFFICER

197 Hanlon Creek Blvd. Unit 103
Guelph, Ontario, Canada, N1C 0A1

1. WHEN DOES THIS PRIVACY POLICY APPLY?

This Privacy Policy applies to a wide range of activities, including when you:

- visit our websites: rlb.ca, people.rlb.ca, digital.rlb.ca, wealth.rlb.ca and any websites which we operate from time to time;
- submit your personal data for an employment opportunity or join our community;
- subscribe to, use or access our online services;
- register for conferences, educational activities and events which we organize;
- participate in a survey or research initiative;
- download resources from our websites, such as tax information; and
- otherwise interact with us (together, our "Services").

This Privacy Policy does not apply to third party websites, applications, or services, even where they may be linked to our Services. For example, our websites may include links to the websites of other organizations that we collaborate with; if you click on a link to another website, that website is not covered by this Privacy Policy. We encourage you to

review all third-party privacy policies and notices prior to using third party websites, applications or services.

2. DEFINITIONS

What is Personal Data?

In this Privacy Policy, when we use the term "personal data", we mean any information that relates to you, as an identified or identifiable natural person. The personal data that we collect depends on the circumstances (see Section 3 "What personal data do we collect about you, and for what purposes?").

Some of the information which we consider as personal data for the purpose of this Privacy Policy may not be protected under applicable laws, and you may not be entitled to the same rights regarding such personal data.

Personal data may include information collected about you through cookies and tracking technologies such as beacons and web pixels (together, the "cookies"). Cookies are small blocks of data which are installed on a browser or a device during a session, and which remembers preferences or information about you. Learn more about our practices regarding the use of cookies and interest-based advertising in Sections 16-17 of this Policy.

3. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU, AND FOR WHAT PURPOSES?

Our firm collects personal information for the following purposes:

- I. To provide, maintain, improve, and enhance our services to you;
- II. To understand and analyze how you use our services and develop new products, services, features, and functionality;
- III. To facilitate purchases of products or services that you order;
- IV. To advise and assist you with personal and financial planning, retirement and succession planning, and other business and personal advisory services;
- V. To understand your needs and determine the suitability of other services we may be able to offer you;
- VI. To process job applications;
- VII. To conduct marketing and advertising, including developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you;

VIII. To share, as reasonably required, for the purposes stated above, within our group of businesses; and

IX. To comply with legal and regulatory obligations.

Examples of personal data collected: Identification data, contact information, professional information, affiliation data, financial information, responses to surveys, forms, questionnaires, marketing preferences, website usage data (including through cookies), and number of visits.

4. CONSENT TO COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION

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, unless required by law.

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 or other services, 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.

Right to Withdraw Consent: 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.

Disclosure Required by Law: Our firm will disclose your personal information, for other than the purposes stated above, only if required to do so by law or by professional regulatory obligations. We will notify you of such disclosure and provide you with the reason that obligates us to release the personal information, where permitted by law.

5. LIMITING THE COLLECTION OF PERSONAL INFORMATION

Our firm restricts the collection of personal information only to that information that is necessary for the limited purposes noted in Section 3. We are committed to collecting personal information in a fair, open and lawful manner.

6. DO WE SHARE PERSONAL DATA WITH THIRD PARTIES?

We do not rent or sell your information or share it with any third party unless it is necessary to fulfill a request or inquiry from you, or as otherwise described in this Policy.

Service Providers: We may share your personal information with trusted third-party service providers who assist us in operating our business, including:

- Cloud storage and data hosting providers
- IT support and cybersecurity services
- Professional advisors (lawyers, auditors, consultants)
- Software and technology providers (accounting software, client portal systems)
- Marketing and communications platforms

These service providers are contractually obligated to protect your personal information and may only use it for the purposes we specify.

Legal Requirements: If required by law, court order, or professional regulatory requirements, we reserve the right to disclose your personally identifiable information.

RLB LLP data practices and privacy policy comply with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation in Ontario.

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

Our firm has developed and implemented security safeguards appropriate to the sensitivity of the personal information kept by us. These security safeguards include but are not limited to:

- Physical security measures, such as locked storage, restricted access to areas where personal information is stored, and secure disposal protocols;
- Technical security measures, including encryption, firewalls, secure servers, multi-factor authentication for client portals, and regular security assessments;
- Internal employee security measures, including restricted computer access, employee confidentiality agreements, employee training, background checks, and limited access to where personal information is stored; and
- Organizational measures, including privacy impact assessments, vendor security reviews, and incident response procedures.

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.

Employee Responsibilities: 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.

Data Disposal: Personal information kept by us is disposed of or destroyed securely once it is no longer needed to meet the purposes for which it was collected, or as required by professional standards and legal obligations (for example, CRA requirements to retain tax records for seven years). If at any point you wish for us to delete information about you, you can do this by contacting us in writing at the address set out in Section 15 "How Can You Unsubscribe From Our Communications."

Your Responsibilities: We may also require you to assist us to safeguard your personal data. For instance, if you use an account on our client portal, you should use unique and strong passwords, not share your passwords with others, enable multi-factor authentication where available, and promptly alert us if you believe your password has been compromised. You should only connect to our website or client portal via a safe network.

8. DATA BREACH NOTIFICATION

In the event of a data breach involving your personal information that poses a real risk of significant harm, we will:

- Notify affected individuals as soon as feasible;
- Report the breach to the Office of the Privacy Commissioner of Canada and any other applicable regulators;
- Provide details about the breach, the personal information involved, the steps we are taking to mitigate harm, and the steps you can take to protect yourself; and
- Maintain records of all breaches and our response measures.

If you believe there has been unauthorized access to your personal information, please contact our Privacy Officer immediately at privacyofficer@rlb.ca.

9. WHO HAS ACCESS TO YOUR INFORMATION?

In order to provide the best service possible, RLB LLP employees are permitted to access the information they need to perform their jobs. However, we maintain strict internal policies against unauthorized disclosure or use of client information.

Access to personal information is limited to employees, partners, and authorized service providers who require it to fulfill their duties. All individuals with access to personal information are bound by confidentiality obligations.

10. WHERE DO WE STORE YOUR PERSONAL INFORMATION?

Generally, we retain your personal data at our offices in Ontario, Canada and data centres elsewhere in Canada.

In addition, unless prohibited by law, we may rely on service providers who are outside Canada who assist us with the Services, in which case your personal data may be stored in or accessed from the country where the service providers operate. In cases where data is stored in the United States, your personal data will be subject to United States laws and may be subject to disclosure to United States governments, courts or law enforcement or regulatory agencies, pursuant to those laws.

Subject to those laws, RLB LLP uses reasonable measures to protect your personal data as it would be protected in Canada. If you would like more information about our policies and practices regarding processing of personal data outside of Canada, please send us an email at privacyofficer@rlb.ca.

11. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your personal data for as long as required for the purpose for which it was collected, or longer if we are required or permitted to do so under applicable laws.

Examples of retention periods: Tax records and supporting documentation are retained for a minimum of seven (7) years in accordance with Canada Revenue Agency requirements. Corporate records may be retained for the duration of the corporate entity's existence plus applicable limitation periods. Employment applications are retained for a reasonable period following the hiring decision.

12. WHAT ARE YOUR PERSONAL DATA RIGHTS?

The law provides you with rights regarding your personal data. These rights may change depending on where you are located, and they may not apply to all types of personal data.

Access: You have the right to access your personal data that we hold. You may request a copy of your personal information by contacting our Privacy Officer.

Correction: You have the right to request corrections to your personal data under certain circumstances, such as if the personal data is inaccurate or outdated.

Withdrawal of Consent: You have the right to withdraw your consent to the use and disclosure of your personal data. In some cases, withdrawal of your consent may mean that we will no longer be able to provide you with our Services.

Data Portability: Where technically feasible, you may request that we provide your personal information in a structured, commonly used, and machine-readable format.

Complaint: You have the right to file a complaint about our privacy practices. If you have concerns about how we handle your personal information, please contact our Privacy Officer first. You also have the right to file a complaint with the Office of the Privacy Commissioner of Canada at www.priv.gc.ca or by calling 1-800-282-1376.

To exercise any of these rights, please contact our Privacy Officer at privacyofficer@rlb.ca. We will respond to your request within thirty (30) days or as otherwise required by law. There is no fee for making a request, though we may charge a reasonable fee for processing complex or repetitive requests.

13. CHILDREN'S PRIVACY

Our Services are not directed at children under the age of 18. In the course of providing accounting and financial planning services to families, we may collect personal information about minor children (such as dependents for tax purposes). Such information is collected with parental or guardian consent and is used solely for the purposes of providing services to the family.

We do not knowingly collect personal information directly from children without parental consent. If you believe we have inadvertently collected information from a child without proper consent, please contact our Privacy Officer immediately.

14. AUTOMATED DECISION-MAKING

We do not use automated decision-making systems that would produce legal effects or similarly significantly affect you without human intervention. Any risk assessments, financial analyses, or recommendations are prepared or reviewed by qualified professionals.

If our practices change in the future to include automated decision-making, we will update this Privacy Policy and seek your consent where required by law.

15. HOW CAN YOU UNSUBSCRIBE FROM OUR COMMUNICATIONS?

We provide clients and subscribers with various communications, such as electronic newsletters, event notifications, tax updates, and other marketing materials.

Canada's Anti-Spam Legislation (CASL): Our marketing communications comply with Canada's Anti-Spam Legislation. We only send commercial electronic messages to individuals who have provided consent or with whom we have an existing business relationship.

You can unsubscribe at any time from such communications by:

- Using the "unsubscribe" link included in our electronic messages;

- Contacting us at marketing@rlb.ca; or
- Writing to us at the address provided at the beginning of this Policy.

Please note that even if you unsubscribe from marketing communications, we may still need to send you service-related communications regarding your account or our professional engagement.

16. DO WE USE COOKIES?

We may install our own cookies and third party cookies on your browser or device through our websites. Some of these cookies are uninstalled automatically at the end of your browsing session.

We use cookies for our websites to function as intended, to conduct marketing, to analyze our performance and to ensure that our websites are secure. Cookies are also useful to identify bugs and errors.

We collect cookies in each of the following categories:

Essential Cookies: Essential cookies are necessary to operate the core functions of our websites. These include login cookies, session ID cookies, language cookies as well as security cookies.

Functional Cookies: Functional cookies are used to provide you with certain website functionality, and to remember website preferences, consents and configurations.

Analytical Cookies: Analytical cookies are used to generate aggregated statistical data about traffic and behavior of our websites' users. For instance, we use Google Analytics to determine how visitors use our websites, such as the number of visitors, from where our visitors come from on the web, the pages they visited and how much time was spent on our websites. We only see this data in an aggregated and traffic-based format, and we cannot see each visitor's data individually.

17. HOW CAN I MANAGE MY COOKIE PREFERENCES?

From time to time, when you arrive at one of our Sites, you will be given the opportunity to allow all cookies, to accept only some cookies or to reject all cookies (via a cookie banner). The latter option may result in certain personalized services not being provided and you may not be able to take full advantage of all the features offered by our Sites.

You can also manage cookies through your browser settings. Most browsers allow you to refuse or accept cookies, delete existing cookies, or be notified when new cookies are installed. Please refer to your browser's help documentation for specific instructions.

18. PROFESSIONAL REGULATORY OBLIGATIONS

As Chartered Professional Accountants, we are subject to the Code of Professional Conduct established by the Chartered Professional Accountants of Ontario (CPA Ontario).

These rules impose confidentiality obligations that align with and, in some cases, exceed the requirements of privacy legislation.

There are limited circumstances where we may be required to disclose client information without consent, including:

- In response to a court order or subpoena;
- When required by professional regulatory bodies in the course of practice reviews or investigations;
- When required by law enforcement agencies pursuant to lawful authority;
- To comply with tax authority requirements; and
- In the context of the sale or transfer of our practice, subject to appropriate confidentiality safeguards.

Where possible and permitted by law, we will notify you before making such disclosures.

19. DO WE UPDATE THIS PRIVACY POLICY?

Yes, we will update this Privacy Policy from time to time. There are many reasons why we may change this Privacy Policy, such as a legislative change, a change in how we collect, use, or disclose your personal data, or changes to our business practices.

When we make material changes to this Privacy Policy, we will:

- Post the updated policy on our website with a new "Last Updated" date;
- Notify active clients via email or through our client portal;
- For significant changes that affect how we use your personal information, seek your renewed consent where required by law.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your personal information. Your continued use of our Services after changes are posted constitutes your acceptance of the updated Privacy Policy.

Questions or Concerns?

If you have any questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact:

Privacy Officer

RLB LLP

197 Hanlon Creek Blvd. Unit 103

Guelph, Ontario, Canada, N1C 0A1

Email: privacyofficer@rlb.ca

Office Hours: Monday to Friday, 9:00 AM to 5:00 PM EST

Expected Response Time: Within 5 business days for initial acknowledgment