

TRG GROUP BENEFITS & PENSIONS INC.
PRIVACY POLICY (May 1, 2018)

OUR COMMITMENT TO PRIVACY

TRG Group Benefits and Pensions Inc. (TRG Group) is committed to maintaining the security, confidentiality and privacy of your personal information. As an ethical employee benefits and pension plans consultant, TRG Group has always respected your privacy and has strived to be an open and accessible organization. This Privacy Policy documents our on-going commitment to our clients and has been developed in compliance with the British Columbia *Personal Information Protection Act* (“PIPA”).

TRG Employees are covered under a separate privacy policy contained in the TRG Employee Handbook.

SCOPE OF POLICY

In accordance with *PIPA*, this Policy addresses personal information about individuals and does not apply to information collected, used or disclosed with respect to corporate or commercial entities. However, corporate and commercial information is protected by other TRG Group policies and practices and through contractual arrangements.

This Policy does not impose any limits on the collection, use or disclosure of the following information by TRG Group:

- your business contact information; or
- publicly available information recognized under *PIPA*.

DEFINITIONS

In this Policy:

“**TRG Group**” means TRG Group Benefits & Pensions Inc., a British Columbia company.

“**collection**” means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

“**consent**” means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent may be given orally or in writing, if it is unequivocal and does not require any inference on the part of TRG Group. Implied consent exists when TRG Group can reasonably infer consent based upon your action or inaction.

“**disclosure**” means making personal information available to a third party.



“personal information” means information about an identifiable individual but does not include his or her business contact information. Personal information does not include information concerning corporate or commercial entities. It also does not include information that cannot be associated with a specific identifiable individual.

“PIPA” means the British Columbia *Personal Information Protection Act*, S.B.C. 2003, c.63; as amended.

“third party” means an individual or organization other than TRG Group and you.

“Privacy Officer” means an individual designated by TRG Group who is accountable for compliance with this Policy by TRG Group and whose contact particulars are set forth at the end of this Policy.

“use” means the treatment and handling of personal information by and within TRG Group.

1. ACCOUNTABILITY

TRG Group is accountable and responsible for personal information under its control. TRG Group has designated a Privacy Officer who is accountable for TRG Group’s compliance with this Policy. Ultimate accountability for TRG Group compliance rests with the TRG Group’s Board of Directors who delegate day-to-day accountability to the Privacy Officer. Other individuals within TRG Group may be accountable for the day-to-day collection and processing of personal information or to act on behalf of the Privacy Officer.

TRG Group will adopt procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies and procedures and communicate policies and procedures to you.

2. PURPOSES

When collecting information, TRG Group will state the purpose of collection, unless the purpose is obvious, and will provide, on request, contact information for the Privacy Officer who can answer questions about the collection.

TRG Group collects, uses and discloses your personal information as authorized or required by applicable law and for the following purposes:

- to provide and administer products and services requested by you and to use and disclose the information for any purpose related to operation of accounts and provision of requested products and services;
- to determine your potential needs and financial capabilities, including obtaining health claims and other relevant reports;



- to determine which products and services may meet your potential needs;
- to evaluate applications and determine insurance risks;
- to share personal information with third party suppliers of the products and services you have requested (such as mutual fund companies, custodians, trustees, financial institutions, benefit administrators, claims assessors, insurance companies, brokers and others engaged in the financial products and services industry) in order to provide you with advice regarding products and services requested by you;
- to update your personal information with third party product and service providers (such as those listed above);
- to detect and to protect TRG Group, yourself and others from fraud and error and to safeguard the financial interests of TRG Group;
- to authenticate your identity;
- to provide personal information to our associate brokers (and anyone else contracting with or otherwise involved with TRG Group) in order to obtain quotations for and to order products or services (or both) requested by you, and to obtain recommendations and opinions of associate brokers on related matters;
- to issue invoices, process payments and collect debts owed to TRG Group;
- to manage or transfer assets or liabilities of TRG Group, for example in the case of an acquisition or merger, the provision of security for a credit facility or the change of a carrier; and
- to comply with legal and regulatory requirements.

TRG Group is required by law to obtain your social insurance number to report interest or investment income to the Canada Customs & Revenue Agency.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with TRG Group.

Other uses:

- TRG Group may use your personal information to offer additional or alternate products and services to you (e.g. newsletters, blogs, updates and events) and may, with your consent, add your personal information to client databases which they prepare and use for this purpose;
- TRG Group may contact you for survey or seminar invitation purposes and for newsletter delivery.



You may instruct TRG Group to refrain from using or sharing your personal information in any or all of the other ways described above at any time by providing written notification to our Privacy Officer. TRG Group acknowledges that the sharing of your personal information in any or all of the other ways described above is at your option and confirms that you will not be refused access to any product or service merely because you have advised TRG Group to stop using or sharing your personal information in any or all of the other ways shown.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is authorized or required by *PIPA* or other law.

3. CONSENT

TRG Group will obtain your consent to collect, use or disclose personal information except where TRG Group is authorized or required by *PIPA* or other law to do so without consent. For example, TRG Group may collect, use or disclose personal information without your knowledge or consent where:

- TRG Group is collecting or paying a debt;
- TRG Group is obtaining legal advice; or
- TRG Group reasonably expects that obtaining consent would compromise an investigation or proceeding.

Your consent may be express or implied, or given through an authorized representative such as a lawyer, agent or broker.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify TRG Group that you do not wish your personal information collected/used/disclosed for optional purposes following reasonable notice to you) or otherwise. For example, oral consent could be expressed over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application form.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided reasonable written notice of withdrawal of consent is given by you to TRG Group (see contact information for Privacy Officer below). Upon receipt of your written notice, TRG Group will inform you of the likely consequences of the withdrawal, which may include the inability of TRG Group to provide certain products or services for which the delivery of that information is a prerequisite.

4. LIMITS ON COLLECTION OF PERSONAL INFORMATION

TRG Group will not collect personal information indiscriminately and will limit its collection of your personal information to what is reasonably necessary to provide a product or service and which is



reasonably necessary for the purposes consented to by you. TRG Group may also collect information as authorized by *PIPA* or other law.

5. LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purposes set out above and as authorized by *PIPA* and other law.

TRG Group will keep personal information used to make a decision affecting an individual for at least one year after using it to make the decision.

TRG Group will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes. TRG Group will take due care when destroying personal information so as to prevent unauthorized access to such information.

6. ACCURACY

TRG Group will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. In most cases, TRG Group will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

If you demonstrate the inaccuracy or incompleteness of personal information, TRG Group will amend the information as required. If appropriate, TRG Group will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, TRG Group will annotate the personal information under its control with a note that a correction was requested but not made.

7. SAFEGUARDING PERSONAL INFORMATION

TRG Group protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

TRG Group will take reasonable steps, through contractual or other reasonable means, to ensure that its suppliers and agents who assist in providing products and services to you implement a comparable level of personal information protection. Some specific safeguards include:

- physical measures such as fire-resistant filing cabinets and relevant office shelving which are locked during non-business hours;



- organizational measures such as restricting employee access to files and databases as appropriate;
- electronic measures such as passwords and firewalls;
- investigative measures where TRG Group has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.
- confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication.
- TRG Group will not be responsible for any loss or damage suffered as a result of a breach of security or confidentiality when you transmit information to TRG Group by e-mail or other wireless communication or when TRG Group transmits such information by such means.

8. OPENNESS

TRG Group is open about the policies and procedures it uses to protect your personal information. Disclosure of our policies and procedures will be made available in writing and electronically. However, to ensure the integrity of our security procedures and business methods, TRG Group will not disclose sensitive information about its policies and procedures.

TRG Group will make available a description of the type of personal information held by TRG Group, and a general description of its use and disclosure.

9. PROVIDING ACCESS

You have a right to access your personal information held by TRG Group.

Your personal information, which is or will be contained in files, statements, transaction slips and account agreements will be provided upon request and authentication of identity.

Upon written request and authentication of identity, TRG Group will provide you with your other personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom such information has been disclosed.

TRG Group may charge a reasonable fee for providing personal information in response to a *PIPA* access request and will provide an estimate of any such fee upon receiving a written access to personal information request. TRG Group may require a deposit for all or part of the fee. TRG Group will make personal information available within 30 days or provide written notice where additional time is required to fulfil the request.

In some situations, TRG Group may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about



another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation or where disclosure of the information would reveal confidential commercial information that, if disclosed, could harm the competitive position of TRG Group. TRG Group may also be prevented by law from providing access to certain personal information.

Where an access request is refused in whole or in part, TRG Group will notify you in writing, giving the reason for refusal and outlining further steps which are available to you.

10. COMPLAINTS

TRG Group will, on request, provide information regarding its complaint response procedure. Any inquiry, complaint or question regarding this Privacy Policy must be directed in writing to the TRG Group Privacy Officer.

Contact Information:

Privacy Officer

TRG Group Benefits & Pensions Inc.

Suite 800 – 1177 West Hastings Street Vancouver, BC V6E 2K3

Phone: 604-714-4400

Facsimile: 604-714-4401

E-mail: ljandali@trggroup.com

