

Privacy Policy Statement

Policy

Ward & Uptigrove is committed to protecting the privacy of its staff, clients/customers and business information. All staff members are obligated to ensure private information, to which they may have access, remains confidential, and is only used for the purposes for which it was collected. Staff shall adhere to this policy and associated procedures regarding collection, use, and disclosure of private information.

W&U commits to respect and protect the privacy and confidentiality of clients', Partners', Principals', and staff members' personal and business information that is entrusted to us in the course of rendering services

As Professionals within our respective fields, we are governed by the ethics and Rules of Professional Conduct of the Chartered Professional Accountants of Ontario, the Human Resources Professional Association, the Board of Canadian Registered Safety Professionals, and other applicable governing bodies.

This policy adheres to the ten principles as established by the Personal Information Protection and Electronic Documents Act (PIPEDA).

Staff members who violate this policy will be subject to disciplinary action, up to and including termination for cause. All Partners, Principals, and staff members are responsible and accountable for compliance with and the implementation of this policy. All questions or concerns regarding this policy shall be directed to our Privacy Officer, Pat Downey at privacy@w-u.on.ca.

Private Information Protection Principles

Accountability

Ward & Uptigrove is accountable for private information under its control that is received directly or indirectly from clients, Partners, Principals, staff members, and any other third party. We are also responsible for private information under our control that is disclosed to third parties for processing, as per legislated requirements, or other administrative functions.

W&U has zero tolerance for any reprisal or denial of benefit to staff, who act in good faith related to their legislated duties and a, b, and c listed below:

- a) Disclosure to the Privacy Commissioner of Canada that Ward & Uptigrove or any other person has contravened or intends to contravene a provision of PIPEDA related to the protection of personal/private information;
- b) Refusal or intent to refuse to contravene any provision of PIPEDA related to the protection of private information;
- c) Acts or intends to act in accordance with the provisions and requirements of PIPEDA related to the protection of private information not to be contravened.

Purpose

Partners, Principals, and staff members, may receive personal, privileged and/or confidential information which may concern other staff members, company operations or Clients. This policy preserves the privacy of Partners, Principals, staff members, clients and Ward & Uptigrove, by describing the obligations of applicable parties and the procedures for managing private information.

Consent

Ward & Uptigrove shall inform individuals and obtain their consent prior to the collection, use, and/or disclosure of private information. Subject to certain legal and contractual restrictions, and reasonable notice, individuals may withdrawal consent at any time.

Limiting Collection

Ward & Uptigrove shall only collect private information for the identified and consented purpose; by fair and lawful means.

Limiting Use, Disclosure and Retention

Private information shall only be used and/or disclosed for the identified and consented purpose, unless additional consent is obtained or as required by law. Ward & Uptigrove has established retention periods for private information; dictated when such information shall be deemed obsolete and destroyed.

Client Information

Personal, privileged and/or confidential client information shall only be collected, used, disclosed, and retained for the identified and consented purposes; only after such purposes are disclosed to said clients. The purpose(s) shall be identified prior to, or at the time of, collection.

Client information may be disclosed internally and with other affiliated companies, including: Ward & Uptigrove Wealth Management, Independent Accountants' Financial Group (IAFG), Independent Accountants' Investment Council (IAIC), Independent Accountants' Life Insurance Agency Inc., and Independent Accountants' Investment Group (IAIG). Clients have the right to refuse or withdraw



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P.O. Box 127, 145 Main Street East
Listowel, ON N4W 3H2
Tel: (519) 291-3040 Fax: (519) 291-1850
Email: results@w-u.on.ca
www.wardanduptigrove.com

consent to the collection, use, and/or disclosure of private information: however, withdrawal may prohibit or adversely affect the success of our professional engagement. W&U shall notify clients of such concerns.

All W&U Partners, Principals, and staff members shall ensure that private information is only disclosed with client consent and if security procedures are satisfied.

Private information requested by an individual or Privacy Commission shall be retained as necessary to facilitate exhaustion of all applicable recourses as per PIPEDA.

Accuracy

Private information collected shall be as accurate, complete, and current as necessary to fulfill the identified purpose(s).

Clients are encouraged to contact Ward & Uptigrove to update their private information.

Partners, Principals, staff members, and Employment Candidates shall contact Deborah Good, the Human Resources Manager to update private/personal information.

Safeguards

Ward & Uptigrove has implemented safe guards to protect private information against loss, theft, and unauthorized access. This includes locked cabinets and storage, restricted access, and use of passwords/encryption for electronic files.

Scope

This policy applies to all Partners, Principals, staff members, and applicable contractors/subcontractors of Ward & Uptigrove, and any other parties granted access to personal, privileged, and/or confidential information.

Challenging Compliance

Ward & Uptigrove shall respond to all complaints and questions relating to privacy, and the designated Privacy Officer shall investigate and endeavor to establish resolutions.

Submit all privacy concerns or complaints, in writing, to Pat Downey, Privacy Officer: privacy@w-u.on.ca. The Privacy Officer shall investigate, determine a reasonable resolution, and report the findings to the complainant within 30 days.

If the resolution is deemed unsatisfactory or ineffective, or there are further related complaints, contact the Office of the Privacy Commissioner of Canada, 112 Kent Street, Ottawa ON K1A 1H3.