

SCB Connect Ltd. Privacy Policy

Commitment to Privacy

SCB Connect Ltd. is committed to protecting the privacy of our customers. We are dedicated to providing you with superior service while protecting your privacy and safeguarding your personal information. Your personal information is fundamental in the way we conduct our business.

SCB's Privacy Policy provides the principles in which we will adhere to protect your personal information. Our Privacy Policy is built upon the provisions set out by the Canadian *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 ("PIPEDA"). PIPEDA acknowledges the need to protect an individual's right to privacy and also addresses the necessity of collecting private information for businesses in the conduct of their business affairs. The act provides guidelines and principles for businesses for the accountability, purpose, obtaining of consent, disclosure, accuracy, safeguarding, openness of policy and access to personal information that was entrusted to its care.

"Personal Information" is defined in PIPEDA as information about an identifiable individual. Personal Information, includes, without limitation, information relating to identity, nationality, age, gender, address, phone number, e-mail address, social insurance number, date of birth, marital status, education, employment, health history, assets, liabilities, payment records, credit records, loan records, income and information relating to financial transactions as well as certain personal opinions or views of an individual. Personal Information, however, does not include the name, business title, business address or telephone number of employees of organizations.

Our Privacy Policy and Principles

Under PIPEDA, we are obliged to demonstrate to our customers, and to any individual, our commitment in protecting one's personal and private information.

As part of this commitment, we have adopted the following ten principles, based on the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's PIPEDA.

1. Accountability: Each company in Canada is responsible for maintaining and protecting the personal information under its control and shall designate one or more individuals to be accountable for that company's compliance with these principles.

2. Identifying Purposes: The purposes for which personal information is collected shall be identified before or at the time the personal information is collected.

3. Consent: Individual's consent will be obtained for the collection, use or disclosure of personal information, except where the law provides an exemption.

4. Limiting Collection: The personal information we collect shall be limited only to that which

is necessary for the purposes identified.

5. Limiting Use, Disclosure and Retention: Personal information shall only be used or disclosed for the purposes for which it was collected, unless an individual has otherwise consented or when it is required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

6. Accuracy: We shall keep personal information as accurate, complete and up-to-date as may be necessary to fulfill the purposes for which it is to be used.

7. Safeguards: We shall protect personal information using security safeguards that are appropriate to the sensitivity level of the personal information received.

8. Openness: We will provide information to individuals about our policies and procedures relating to the management of personal information that is under our control.

9. Individual's Access: On written request to our Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information that is under our control, and may be given access to that personal information as required and permitted by law. Individuals are entitled to challenge the accuracy and completeness of that personal information and request that it be amended, if appropriate.

10. Handling Enquiries or Complaints: Any questions or enquiries concerning compliance with our privacy policies and procedures may be addressed to our Privacy Officer, as set out below.

Why Do We Collect Your Personal information?

Collecting personal information about you is essential to our being able to provide the products and services that best meet the needs of both yourself and/or authorized third parties. While the personal information we collect may come directly from you, it may also be provided by our affiliates or other third parties (such as employers, insurance companies, insurance brokers or agents, credit organizations, motor vehicle and driver licensing authorities, financial institutions, medical professionals, etc.). If you are an ADP, LLC (“ADP”) customer that has accessed our [name of application] through ADP’s application marketplace, we may also collect your personal information from ADP’s WFN platform via our application program interface and import interface.

Personal information collected by us may be used for the following purposes:

- (a) to determine eligibility for products and services;
- (b) to process applications and provide requested information, products or services;
- (c) to understand and assess your ongoing needs, as well as those of authorized third parties
- (d) to establish and maintain responsible commercial relations with you and provide you with ongoing service;
- (e) to obtain information for billing and accounting services relating to our products and services;
- (f) to enroll you in your insurance program;
- (g) to provide advice on insurance and investment related products;

- (h) to provide HR related services;
- (i) for communication, service and administration;
- (j) for internal, external and regulatory audit purposes;
- (k) to meet insurance requirements;
- (l) to manage and develop our business and operations to provide our customer the highest level of satisfaction; and
- (m) to meet legal and regulatory requirements.

Personal information may also be used for other purposes, subject to obtaining your prior consent for such use.

We Need Your Consent

Consent is required for the collection of personal information and the subsequent use or disclosure of this information. We may obtain your express consent or we may determine that consent has been implied by the circumstances. Express consent could be in writing (for example in a signed consent, e-mail or application form), or verbally in person or over the telephone. We may imply consent when information is provided and submitted to us via an application or form on our website, or by access or use of our website and the services provided thereon.

When we receive personal information from you in order to allow us to provide you with a requested product or service, your consent to allow us to use that personal information in a reasonable manner is implied. If you need to provide personal information about other individuals (such as employees, dependents, etc.), you must first obtain their consent for these purposes prior to your disclosure to us.

Providing us with your personal information is always your choice. When you request services from us, we ask that you provide information that enables us to provide those services to the best of our abilities. You will be authorizing us to use and retain this personal information for as long as it may be required for the purposes described above.

Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. By withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you or an authorized third party (such as an employer) with the products or services desired.

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. You can contact us at [647-715-2708] to express your intention to withdraw your consent. You may also contact us for more information regarding the implications of withdrawing consent.

This policy does not cover statistical data from which the identity of individuals cannot be determined. We retain the right to use and disclose statistical data as we determine appropriate.

We Will Only Use Your Personal Information for the Purpose We Mentioned

We can only use your personal information for the purposes we have stated in this Privacy Policy, any forms signed or completed by you, and any purposes that may be outlined and agreed to verbally, as well as within the limits of the PIPEDA.

In the event that we want to use your personal information for a purpose not previously identified, consent with respect to use or disclosure may be sought but before it is used.

We may, however, in accordance with PIPEDA collect personal information without your knowledge or consent for a variety of reasons. These include collection solely for journalistic, artistic or literary purposes; information that is publicly available; collection that is clearly in the interests of the individual and consent cannot be obtained in a timely way, or it is required by law.

We are not in the business of selling client lists or personal information to others. Under no circumstances will we sell, distribute or otherwise disclose personal information to other parties. In providing our services, we may need to disclose the personal information we collect to affiliates, subsidiaries, successors and other service providers or agents who perform various functions for us, but only with the understanding that these parties obey and abide by this Privacy Policy.

In certain circumstances, we may be required to provide personal information to third parties for legal or regulatory purposes.

Keeping Information Accurate

It is important that your personal information is accurate and complete. Having accurate information about you enables us to give you the best possible service. You have the right to access, verify and amend the information we have about you. We rely on you to keep us informed of any changes, such as a change of address, telephone number or any other circumstances.

Despite our best efforts, errors sometimes do occur. If you identify any personal information that is out-of-date, incorrect or incomplete, let us know and we will make the corrections promptly and use every reasonable effort to communicate these changes to other parties who may have inadvertently received incorrect or out-of-date personal information from us.

How Long Do We Keep Your Personal Information?

We maintain your personal information until the purpose we have mentioned has been fulfilled. We also take into consideration the amount of time required by law to maintain such records and personal information.

In accordance with our industry standards, any information that we collect that is classified as financial information must be retained for a period of ten (10) years. All administrative, correspondence, salary changes or termination notices must be kept for two (2) years (or one (1) year if an electronic history is available) from the date of the correspondence or event. Active enrolment cards must be retained indefinitely, and terminated enrolment cards are retained for ten (10) years from the date of termination.

After such time, your personal information will be properly disposed according to our guidelines in the destruction of personal information.

Our Commitment to Data Security

We are committed to protecting your personal information with the appropriate security measures, physical safeguards and electronic precautions. Access to personal information will be authorized only for the employees and authorized third parties who need to know this information in order to perform their respective job duties and for the purposes set out in this Privacy Policy.

The methods of protection include:

- (a) physical measures, for example, locked filing cabinets and restricted access to offices;
- (b) organizational measures, for example, security clearances and limiting access on a “need to know” basis;
- (c) technological measures, for example, the use of passwords and encryption; and
- (d) investigative measures where required to safeguard our interests or our customers.

We make the effort to train our employees and make them aware of the importance of maintaining the confidentiality of personal information. Our employees are required to maintain confidentiality, and may not use the information for any unauthorized purpose. Only SCB’s employees and affiliates with a business need to know, or whose duties reasonably so require, are granted access to your personal information.

We store personal information only for the period of time and to the extent required for its use and to meet the period of time required by law. After this period, your personal information will be properly disposed of according to our guidelines in the destruction of personal information.

For more information on our commitment to data security, please review our Information Security Policy www.myscbconnect.com/login

How Do We Dispose of Your Private Information?

We shall destroy, erase, or make anonymous personal information that is no longer required to fulfill the identified purposes and meeting the required period by law.

We will shred paper documents containing personal information and properly dispose of them through a federally approved disposal company.

We will delete personal information from our files.

In the event that the personal information cannot be deleted, we would then make the information anonymous to make sure that the identity of the person having that personal information is not compromised.

Your Right to Your Personal Information We Collect

We recognize your right to your personal information we have collected. We will make an effort to inform you of what information we have on you. Should you wish to review to verify what personal information we hold, or to whom the information has been disclosed (as permitted), you may make a request for access in writing. Upon verification of your identity, we will respond within thirty (30) days.

If you find that your personal information is inaccurate, or have a question on our Privacy Policy, you can contact our Privacy Officer at 647-715-2708 or e-mail at nella.stavropoulos@sterlingcapitalbrokers.com.

In accordance with PIPEDA, we will not give an individual access to personal information if doing so would likely reveal personal information about a third party and the information is not severable from the record containing the information about the individual or the third party will not consent to the disclosure of their personal information.

Privacy and the Internet

We may collect user information from our websites (for example, via cookies which are alphanumeric identifiers transmitted from a website to a visitor's browser and IP address). This information is used solely for enabling us to provide you with a customized online experience and to find ways to improve our site. Although cookies are widely used, it may be possible to disable cookies via your browser settings. However, in so doing, some Web sites may not function properly or optimally.

Websites may contain links to other third party sites that are not governed by this privacy policy. Although we endeavor to link only to sites with high privacy standards, our Privacy Policy will no longer apply once you leave this website (<http://myscbconnect.com>). We are not responsible for privacy policies employed by other third parties or any foreign affiliates, since they would be governed by privacy legislation applicable in their country of residence. We suggest, therefore, that you examine the privacy statements of those sites to learn how personal information may be collected, used and/or disclosed.

Changes to this Privacy Policy

We may from time to time change or update this Privacy Policy as new services and uses are added or laws change. Changes to this Privacy Policy will be effective when notice of such change is posted on our website. Please check this Privacy Policy regularly for updates.

Contacting Us

Should you have any questions or concerns about our Privacy Policy, please feel free to contact us at 647-715-2708 and ask for the Privacy Officer.

We will make the effort to respond to all inquiries within the required period provided by PIPEDA. We have put in place a Privacy Officer to look after the implementation and compliance with PIPEDA.

Complaints/Recourse

If an individual has a concern about SCB's personal information handling practices, a complaint, in writing, may be directed to us.

Upon verification of your identity, we will act promptly to investigate the complaint and provide a written report of the investigation's findings.

Where we make a determination that the complaint is well founded, necessary steps will be taken to correct the offending information handling practices and/or revise our privacy policies and procedures.

Where we determine that the complaint is not well founded, we will notify the complainant in writing.

If you are dissatisfied with the finding and corresponding action we take, you may bring a complaint to the Federal Privacy Commissioner at the address below:

The Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario
K1A 1H3
Tel. 1-800-282-1376