



# Privacy Policy

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## **SECTION 1 INTRODUCTION**

Advocis is a voluntary membership association for professional financial advisors in Canada.

Since its founding in 1906, Advocis has always taken the issue of privacy very seriously in the promotion of its objectives:

(a) *Protection of Consumers Interests through Professionalism*

- To protect by all lawful means the interests of consumers by promoting the professionalism of its Members in Canada;

(b) *Excellence among Members*

- To promote excellence among its Members in the efficient practice of life insurance and personal financial planning by establishing best practices, regulating standards of practice and encouraging basic and continuing education; and

(c) *Public Awareness*

- To improve public awareness and understanding of personal financial planning.

## **SECTION 2 DEFINITIONS**

**"Act"** means the Personal Information Protection and Electronic Documents Act, R.S.C. 2000 c.C.32 as amended or re-enacted from time to time, or any act that may be substituted for it.

**"Advocacy"** means the Personal Information that is collected by Advocis and utilized for input for submissions for various forms of government and media coverage.

**"Advocis"** means the corporation without share capital formed under the laws of Canada under the name The Financial Advisors Association of Canada and carrying on business under the brand "Advocis."

**"Chapter"** means one of the organizations of Advocis established by the Board of Directors of Advocis pursuant to its General By-laws.

**"Communications"** are any non-confidential and/or non-proprietary communications information, except for Personal Data, that you transmit to the Site by electronic mail or otherwise, including data, questions, comments and/or suggestions.

**"Customer"** means an individual who purchases our products or services and who is not a member or an individual who purchases our products and services and is also an Advocis member and is entitled to privileges available to members.

A corporation that may be a corporate or education partner that maintains an agreement with Advocis for specific discounts to members for Advocis products or services.

**"Education Courses"** means all of Advocis' formal training programs including the following:

- Life License Qualification Program (LLQP);
- Chartered Life Underwriter program (CLU);
- Certified Financial Planner education program (CFP);
- Registered Health Underwriter program (RHU);
- Segregated Funds Course;

- Level II Licensing Manual and Training Course;
- Continuing Education programs including
- Best Practices;
- Compliance;
- Advocis schools;
- Knowledge Bureau;
- CLU/CFP Update;
- ICB continuing education modules;
- Other continuing education seminar;

**“Expressed Consent”** -- Personal information, such as name, address, telephone number, and other information voluntarily provided to Advocis during user registration process will not be distributed to third parties without the expressed and formal consent of the member or customer either in writing, orally, or in electronic update by the member on the web.

**“Implied Consent”** means the consent assumed by past practices and does not include specific written or oral consent.

**“Member”** means a person who has applied for and been accepted into membership of Advocis and has paid their annual membership fees.

**“Non-Personal Information”** is any Communication derived from your connection to the Site, such as your Internet browser, domain name and referring link. All Communications, except for Personal Data, will be treated as non-confidential and non-proprietary will become the property of Advocis and may be used for the purposes described herein.

**“Persistent Cookie”** is also called a permanent cookie, or a stored cookie. It’s a cookie that is stored on a user’s hard drive until it expires (persistent cookies are set with expiration dates) or until the user deletes the cookie. Persistent cookies are used to collect identifying information about the user, such as Web surfing behavior or user preferences for a specific Web site.

**“Person”** means an individual or any business entity including a partnership, or corporation.

**“Personal Information”** means information about an identifiable individual that is recorded in any form including, without restricting the generality of the foregoing,

- information relating to the race, national or ethnic origin, colour, religion, age or marital status of the individual,
- information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- any identifying number, symbol or other particular assigned to the individual,
- the address
- correspondence sent to a government institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to such correspondence that would reveal the contents of the original correspondence,
- the views or opinions of another individual about the individual,
- the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual by an institution or a part of an institution referred to in paragraph, but excluding the name of the other individual where it appears with the views or opinions of the other individual, and

- the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual,

“**Policy**” means this Privacy Policy as may be amended from time to time.

“**Product**” means all goods and services offered by Advocis from time to time and includes affinity products or services, political, legislative or regulatory Personal Information or advice, goods, intellectual property, etc. These may include commercial books, periodicals and articles sold through the Advocis store; forms and documents required to be completed by the agent including replacement and disclosure forms; Advocis published textbooks; Advocis courses and continuing education programs; Errors and Omissions Insurance.

“**Services**” means the services sold by Advocis to Members and Customers. Special privileges offered by membership in Advocis including; Affinity discounts, Advocacy services including communication of members needs to government and industry overseeing bodies.

“**Session Cookie**” is also called a transient cookie, a cookie that is erased when the user closes the Web Browser. The session cookie is stored in temporary memory and is not retained after the browser is closed. Session cookies do not collect information from the user’s computer. They typically will store information in the form of a session identification that does not personally identify the user.

“**Suppliers**” means any organization or person that makes goods or services for Advocis, its Members and Customers. Any organization providing products and services to Advocis including consultants providing education program content; computers, printers, photocopiers and fax machines; furniture and equipment; communication services including telephone and internet, printing services. Legal and insurance etc.

“**Volunteer**” means a Member of Advocis who serves on a Board, Committee Task Force or individually in some other capacity to perform work for Advocis without payment. A member of an Advocis chapter who offers his or her services without compensation to support chapter initiatives by serving on chapter committees, moderating education study groups and / or representing the chapter with Advocis national and other organizations.

“**You**” means a Member of Advocis, a Customer of Advocis, or other interested stakeholder.

“**We or Us**” means Advocis.

### **SECTION 3 APPLICATION OF THE PRIVACY POLICY**

(a) *Applies to the Members, Chapters and Staff of Advocis*

The terms and conditions of this Policy are applicable to all directors, officers, employees, chapters, contract staff, consultants, and Members of Advocis in relation to Personal Information of Members, Customers and other stakeholders.

(b) *Applies to Suppliers*

Advocis shall endeavour to ensure that the terms and conditions of this Policy are adhered to by all Suppliers of Advocis, its Members and Customers.

- (c) *Does not apply to Clients of Members*

This Policy does not apply to clients of Members or Corporate Partners or extends to the business of Members as they may carry it on in one or more provinces.

#### **SECTION 4 TEN PRIVACY PRINCIPLES**

- (a) *Principle 1 Accountability*

Advocis has appointed an individual or individuals who are accountable for its compliance with the ten principles.

- (b) *Principle 2 Identifying Purposes*

The purpose for which Personal Information is collected shall always be clearly identified before or at the time the Personal Information is collected.

- (c) *Principle 3 Consent*

The knowledge and Expressed Consent of the Member, Volunteer, or Customer are required for the collection, use, or disclosure of Personal Information except where required or permitted by law.

- (d) *Principle 4 Limiting Collection*

The Personal Information collected shall be limited to those details necessary for the purposes identified, and Personal Information will only be collected by fair and lawful means.

- (e) *Principle 5 Limiting Use, Disclosure and Retention*

Personal Information may only be used or disclosed for the purpose for which it was collected unless the Member, Volunteer or Customer has otherwise given Expressed Consent, or when it is required or permitted by law. Personal Information shall only be retained for the period of time required to fulfill the purpose for which it was collected.

- (f) *Principle 6 Accuracy*

Personal Information shall be maintained in as accurate, complete and up to date form as is necessary to fulfill the purpose for which it is to be used.

- (g) *Principle 7 Safeguarding Members Personal Information*

Personal Information shall be protected by security safeguards that are appropriate to the sensitivity level of the Personal Information.

- (h) *Principle 8 Openness*

Advocis shall make available to any Member, Volunteer or Customer the policies and practices that apply to the management of Personal Information.

(I) *Principle 9 Member Access*

Upon request, a Member, Volunteer or Customer shall be informed of the existence, use and disclosure of Personal Information. The Member, Volunteer or Customer shall be given access to Personal Information. A Member, Volunteer or Customer may verify the accuracy and completeness of his or her Personal Information. A Member, Volunteer or Customer may request that his or her Personal Information be amended, if appropriate.

(j) *Principle 10 Handling Complaints and Suggestions*

A Member, Volunteer, or Customer may direct any question with respect to the privacy principles or the privacy practices to the individual or individuals accountable for privacy.

## **SECTION 5 PRIVACY PROTECTION IN CANADA**

(a) *Personal Information Protection and Electronic Documents Act*

This Policy was developed to meet the standards established by *Personal Information Protection and Electronic Documents Act* enacted by the federal government of Canada in 2000.

(b) *Response to New Realities*

The Act is the first response of a government in Canada to recognize the incredible capacity of computers to collect, store, analyze and disclose Personal Information with incredible speed. The Act is an attempt to balance the right of a Person to a level of privacy with the needs of business for Personal Information to run the business. The issues have been with us for centuries, but the growing awareness that our Personal Information can be easily and cheaply collected, stored and analyzed and used for purposes for which it was never intended has led to the political action by the federal government. This is not just a Canadian initiative. It is world wide.

(c) *Doing Business Differently*

The Act will force businesses to do business differently. Businesses can no longer assume that Personal Information once given can be treated as if the Personal Information was owned by the business that was given the Personal Information. Business will have to respect the giver of the Personal Information. The giver of the Personal Information has been given some rights as to the method of collection, the storage of the Personal Information and the use and disclosure of it.

(d) *Provincial Involvement*

It being Canada there is a constitutional question. The federal government does not have the right to regulate trade and commerce. This power is given to the provinces. Accordingly, the Act provides that if a province does not enact its own privacy legislation before January 1, 2004, the federal Act will apply in that province. At the time of writing this Policy some of the provinces have enacted their own privacy legislation.

## **SECTION 6 WHAT PERSONAL INFORMATION IS COLLECTED**

### *(a) For Membership and Volunteers*

Advocis collects Member Personal Information to provide you with the services and benefits to which you are entitled as members of Advocis. Much of the information that we have about you comes from you at a time when you register for products and services we provide. When you perform transactions or volunteer, (volunteers may include proctors, committee members, board members, chapter staff etc.) You may provide us with such information as your name, address, email, employer etc.

We keep information about the types of services you purchase from our affiliates and our organization. Examples of this include membership applications, course registrations, payment history, awards, and designations.

We may collect information from our web site. This includes your activity while using our site and information from online collecting devices known as "cookies".

### *(b) For Education*

Advocis collects Customer Personal Information to provide you with the Education services and benefits that you have purchased from Advocis. We collect personal information from you in order to provide you with appropriate education programs and provide you with access to testing services.

We may request such information as ;

Name, address, telephone, fax address, email address, employer, and employment information, education history. We also capture and retain records of your test and exam results in order to provide appropriate transcripts to other organizations requiring confirmation of your educational achievements, such as the Financial Planners Standards Council (for CFP) the CLU Institute and regulators for licensing purposes. We will not release information for any other purpose without your written consent.

Advocis also collects customer information to provide you with study leaders and/or moderators who may help and guide you through your courses either in the classroom or online.

Advocis Corporate partnership group may use all types of information both personal and business to promote the benefits of Advocis membership (and also, the benefits of a company's corporate partnership with Advocis) as well as for statistical / research purposes. Both business and personal information is collected in person at meetings / events though business cards, question forms and attendance listings.

Any information collected from promotional events i.e.: new product launch, new partner launch or Conference data is collected as enrollment data .

### *(c) For Advocacy*

Advocis collects Personal Information to provide you with the services and benefits that Advocacy provides. This information is not disclosed nor individually used for Advocacy although derived statistics and general demographics would be used. In certain instances, we will use identifiable information for submissions to various levels of government and media articles that reflect information specific to a member. In those

cases, we would obtain verbal consent to convey information to the government and to the media.

*(d) For Products and Services*

Advocis collects Customer Personal Information to provide you with the products and services that you expect as well as any other products and services that other suppliers might provide that we think might be of interest to you as a Member of Advocis.

If you purchase books, materials, CDs etc from the Advocis Store the registration information you provide is used to process the transaction and ship the goods to the purchaser.

*(e) Your choice*

It is always your choice whether you give Advocis Personal Information. Most of the Personal Information, which we collect, comes directly from you and you give it to us with your consent. You can opt-out of mailings by logging into the members website and filling out the privacy form.

*(f) Types of Personal Information*

The types of Personal Information, which we collect, depend on the nature of your interaction with Advocis. For the most part the Personal Information, which we ask you for, consists of your name, mailing address, facsimile, email addresses; phone numbers, your Advocis identification number, Designations, Awards, Payments, Registrations activity, Birth date etc. (see attached listing)

*(g) Web site*

When you visit an Advocis Web site Personal Information is not collected that could identify you personally, unless you choose to provide it voluntarily. You are welcome to browse the Web sites anonymously and privately without revealing any Personal Information about yourself. The public can surf our "public access" web sites anonymously. Member only access portions require a login process and therefore cannot be anonymous. Any non-personally identifying information collected via the Advocis Web site is used only for statistical reporting purposes. If you login to the member's site and make changes to your record, we will be tracking those transactions and any changes you make to your record.

## **SECTION 7 TYPES OF PERSONAL INFORMATION WE COLLECT**

*(a) General statement*

At Advocis, we collect two types of Personal Information. We collect Personal Information. We may also collect anonymous non-personal Information.

*(b) Anonymous/Non-Personal Information*

At Advocis, we collect anonymous/non personal information. Anonymous/non personal information is information that cannot be associated with or traced back to a specific individual or business entity. For example, our Web servers collect certain anonymous/non-personal information automatically when you visit our Web Site.

Gathered electronically, this information may include the pages you visited, the type of web browser you are using, the level of encryption your browser supports and your Internet Protocol address. The anonymous/non-personal information collected may be used for research and analytical purposes. For example, we are able to determine how many times our online privacy policy has been visited but we do not know any specific information about those visitors.

To help us better understand our markets, we may also gather information for analytical purposes by conducting anonymous customer surveys *and by extracting demographic information from existing files.*

*(c) Personal Information*

The choice to provide us with personal information is always yours. In dealings involving insurance and related financial services, however, your decision to withhold particular details may limit or prevent us from providing the products or services you have asked for. It may also make it more difficult for us to advise you or suggest appropriate alternatives.

Different activities will call for various levels of information. If we are unable to accommodate your request based on the information that has been provided, we may ask for additional details in order to identify other ways we can be of assistance. Occasionally we may also maintain a file containing contact history that is used for customer inquiry purposes.

Personal Information is information that refers to you specifically. With your consent, we may collect Personal Information from you in person, at a Chapter, over the telephone, or by corresponding with you via mail or the internet. The type of Personal Information that Advocis usually collects and maintains in our files includes the following Personal Information.

(i) Personal - General

- Member ID
- Member Status
- Member Type
- Full Name,
- Designations
- Employer
- Residential and Employment mailing address,
- Residential and Employment Email addresses,
- Residential and Employment Telephone #
- Residential and Employment Fax #
- Functional Title
- Billing Category
- Paid Thru Date
- Join Date
- Birth date
- Social Insurance Number (inaccessible but archived on-site)

(ii) Business Personal Information

- Business name
- Contact
- Business Address
- Business Telephone number
- Business email address

(iii) Personal Non-Identifiable Information

- Branch ID
- CAFP Estimated completion date
- CAFP ID
- Chapter
- Corporate Partner ID
- Date record added
- E&O Insurance & Policy #
- Insurance & Jurisdictions
- Level 2 & Jurisdictions
- License Date
- Log of changes and who changed record
- Mutual Funds & Jurisdictions
- Securities & Jurisdictions
- Why joined

(iv) Personal - Financial Information

- Bank #, Account #, Transit #
- Credit Card#, Expiry Date, Name
- Hold on Credit Card , reason and date
- Hold end date
- Payment Amount
- Payment status
- Payment Type
- # Declines count
- Initial Payment Date
- Last Payment Date
- Next Payment Date
- PAP Status

(v) Personal - Education Information

This information is collected on student records and will be used to provide feedback to the students regarding marks on assignments and exams, to inform student of exam location, to ensure that students are receiving the proper courses ordered and to assist students in tracking their CE (Continuing Education) credits.

- # courses passed
- # courses required
- Assignment mark
- CE Registrations
- Course Enrollment info
- Course marks
- Courses taken

- Credit Limit
- Credits
- Enroll date
- Enrollment type
- Exam date, location, marks, type
- Mark
- Mark Adjustment
- Final Mark
- Graded by and date
- Last result & Status
- Material purchases
- Conference registrations
- School registrations
- CE registrations

(vi) Goods & Services

- Affinity programs (we do not maintain any information)
- Books and materials and transactional information
- Promotional events enrollment information

(vii) Professional Liability Insurance

- Professional Liability insurance enrollment
- Professional liability insurance premium payments
- Professional Liability insurance claims
- Insurer
- Insured Amount
- Policy #

(d) *Choice and withholding*

The choice to provide us with Personal Information is always yours. By filling out an application form, you are voluntarily providing us with identifying information. However, your decision to withhold Personal Information may limit the Education, Services, Products and Advocacy information and services that we are able to provide you.

(e) *Additional Personal Information*

If we are unable to accommodate your request for Education, Services, Products or Advocacy, based on the Personal Information that has been provided, we may ask for additional Personal Information.

Random various surveys are delivered that may ask additional information regarding a members stage of career, how they are finding the benefits of membership etc. We use this information to analyze and improve our value offerings.

(f) *Contact Personal Information*

We may also maintain a file on contact Personal Information.

## **SECTION 8 HOW YOUR PERSONAL INFORMATION IS USED**

At Advocis, we use three types of Personal Information.

(a) *Personal Information*

Advocis collects and uses your Personal Information to communicate with you, and effectively provide the Education, Services, Products, and Advocacy you have requested.

We use your personal information for the following purposes:

- To deliver services, such as newsletters, events, training that you request or purchase.
- To help us create and publish content most relevant to you.
- To alert you to special offers, updated information and other new services from Advocis.
- To allow you access to limited-entry areas of our site as appropriate.
- To allow you to access online tests and exams through a third part provider in order to complete the education programs offered by Advocis.
- To chapters for updated mailing lists, exam results etc.

We occasionally hire other companies to provide limited services on our behalf, including packaging, mailing, and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

Advocis will not disclose this information to suppliers unless there is an agreement or a registration that needs to be completed on your behalf. Some of the suppliers we deal with are Knowledge Bureau, Paradigm Bridge, and Everett Kent & Associates.

Any corporate partner company may provide Advocis with a complete or partial list of their advisors and/or employees (such as branch managers and regional directors) for the purpose of an Advocis communication. For example: our FORUM mailing offer, for the Company of the month meetings and to promote the benefits of Advocis Membership and corporate partnership.

Advocis provides all corporate partners and national conference exhibitors with a list of attendees for that event (we have an opt-out clause on the registration form).

Advocis did also provide our Errors and Omissions Carrier AON Reed Stenhouse with a list of all active members of Advocis. AON does contact us to confirm your active membership with our organization.

For non-members we keep your personal and transactional history on file and may want to communicate the benefits of membership to such targeted groups as non-members in our CFP program.

If authorized by yourself (the member) we may allow a 3<sup>rd</sup> party i.e.: Members Assistant to access your personal information and process transactions on your behalf. We will require this authorization in writing or by your authorization on the Members Web site.

From a membership recruitment perspective we use your personal information to win back members and contact them to conduct exit surveys, to target nonmembers who have had activity recently, to recruit nonmembers at a local level through promotional campaigns, letters, events, email blasts, phone calls using all the information we have on file.

(b) *Transactional Personal Information*

The majority of Personal Information, which we collect and keep, is facts about you in relation to the Education, Services, Products, and Advocacy transactions that you do with us. We maintain such information as your personal addressing information, credit card or banking information, as well as any other relevant data required during the registration process.

(c) *Anonymous Non-personal Personal Information*

The anonymous non-personal information collected from the Advocis Web sites are used primarily for technical; research and analytical purposes (technical – type of browser and operating system you use; research and analysis – which are the most frequently downloaded documents, and the most popular viewing times). This information does not contain any personally identifiable Personal Information.

One of our goals is to better serve our Members and we use non-personal information gathered from a number of sources to better understand our Members, Volunteers, Customers, and other Stakeholders who use our Education, Services, Products and Advocacy.

## **SECTION 9 DISCLOSURE OF PERSONAL INFORMATION TO OUTSIDE PARTIES**

(a) *General – Confidential*

At Advocis, we keep your Personal Information secret or confidential except under the following circumstances.

(i) *Authorized by You*

Suppliers and other organizations such as our Education partners contact us for Personal Information about you. To comply with these requests, we require your Expressed Consent. We usually obtain this permission in an agreement, which you expressly agree to in one of many places: for example, the application for membership, the order form for Education the agreement to volunteer, the customer Order form.

A Member, Volunteer or Customer Agreement outlines the terms and conditions associated with Members, Education Services and Products or Advocacy at Advocis. In general, it establishes the rights and obligations of both parties as they relate to Membership, Education, Services or Products or Advocacy.

With respect to the matter of privacy, the Member, Customer, or Volunteer agreement authorizes us:

- Unless you instruct us otherwise, your Personal Information will be used to communicate information to you on other Education, Services, Products and

Advocacy matters, from Advocis or other suppliers, which we think might be of interest to you.

- Unless otherwise instructed, you hereby authorize us to collect, use and disclose personal information about you for Membership, Education, Services, Products and Advocacy from yourself or whatever other source, suppliers, competent regulatory authorities, as may be appropriate to the Membership, including the disciplinary Procedures, Education, Services, Products and Advocacy
- to disclose same, in whole or in part, to such third parties as may be necessary to deliver to you the Membership, Education, Services, Products and Advocacy.
- When you purchase goods and services that are provided by a third party;
- when you register for education programs that are delivered by a third party;
- When your results for education courses taken with Advocis are reported to regulators, your employer or sponsoring company, or any party identified by you to receive such information.
- When you volunteer your services on behalf of Advocis to facilitate or lead study groups or committees.
- When required to notify suppliers for CE, Paradigm Bridge for CFP/CLU Update seminar, Everett Kent & Associates for Compliance Seminar, Institute of Canadian Bankers – for CE Self Study modules and mutual funds course, The Knowledge Bureau for CE modules

In some cases, such as when you apply for membership or Education or Volunteer over the telephone, your Expressed Consent to the collection, use and disclosure of your Personal Information will be obtained orally.

In other cases such as when you apply for a membership or Volunteer over the Internet, your Expressed Consent will be obtained electronically through the registration process. (Surveys, Web Poll, Focus Groups)

(ii) Required By Law

We may be compelled by legal proceedings or court order to disclose certain Personal Information. Only the specific Personal Information requested is ever disclosed. Further, we ensure that the request for Personal Information is legitimate, and that the court or other body has the competence to request the Personal Information.

Advocis may disclose your personal information if required to do so by law or in the good-faith belief that such action is necessary to:

- (a) conform to the edicts of the law or comply with legal process served on Advocis or the site;
- (b) protect and defend the rights or property of Advocis and its family of Web sites, or
- (c) act in urgent circumstances to protect the personal safety of Advocis employees, users of Advocis products or services, or members of the public.

(iii) When Permitted by Law

There are some circumstances where we are permitted to disclose Personal Information, including medical emergency or illegal activities. These are highly remote circumstances in terms of our daily business.

## **SECTION 10 WITH WHOM WE SHARE YOUR PERSONAL INFORMATION**

(a) *Outside Service Suppliers*

At Advocis, we sometimes contract with outside organizations to perform specialized services such as affinity programs, corporate partners, developers of CE programs, consultants for design and creation and web hosting companies. Our trusted outside service suppliers may at times be responsible for processing and handling some of the Personal Information we have received from you. We provide our corporate partners with lists of participants in our conferences and schools.

When we contract with an outside supplier it is given only the Personal Information necessary to perform those services. Additionally, each such service supplier is prohibited from storing, analyzing, or using that Personal Information for purposes other than to carry out the service it has been contracted to provide. Our service suppliers are bound by strict contractual obligations that are in conformity with this Policy that have been designed to protect the privacy and security of your Personal Information.

We will share your personal information with third party suppliers of products and services that you request through Advocis, including: testing services for our educational programs; books and periodicals; personalized items such as pens, clothing, mementos, etc, purchased through Advocis and provided by third party suppliers.

Affinity Programs – members are directed to partners directly for registration for their products and services. Advocis does not administer nor share any information with Affinity Partners.

(b) *Employees*

In the course of daily operations, access to your Personal Information is restricted to those employees who are authorized to and who have a legitimate business purpose and reason for looking at your Personal Information. For Example, when you call us, the Membership Services Rep that handles your call has access to your file and can see your Personal Information on Education, Services, Products, and Advocacy.

As a condition of employment, each Advocis employee, , and director is required to abide by the privacy standards that Advocis has put into place in this Policy and the administrative practices of Advocis. Each employee is also required to work within the ethical rules that Advocis has established. Finally, each employee must sign a confidentiality agreement that prohibits disclosure of any Personal Information obtained while an employee of Advocis.

Unauthorized access to or disclosure of Personal Information by a director, officer or employee is prohibited. All directors, and employees are expected to maintain the privacy of all Personal Information. Failure to do so will result in appropriate disciplinary measures including dismissal or removal from the Board of Directors.

## **SECTION 11 OUR OPT-OUT POLICY**

### *(a) Consent for Promotional Material*

In order to provide you with the best Education, Services, Products and Advocacy, Advocis with your consent may share your name, address and phone number with other businesses or suppliers in order that you may receive promotional materials.

### *(b) Revocation of Consent and Consequences*

If you do not wish to receive such promotional materials from other businesses or suppliers, you may contact Advocis to revoke your consent. Revocation of your consent will cause any and all promotional material not to be delivered to you.

Advocis will assume that you want to continue receiving mailings, materials etc. as you have had unless you indicate that you do not wish to do so. Members will have the ability to login on the web and deselect the items that they do not wish to receive.

Mailing groupings will be broken into:

1. Advocis Professional Development/Educational information materials
2. Government/Industry Advocacy Materials
3. Advocis Information and News Broadcast Material
4. Forum Magazine
5. Advocis 'Find An Advisor' online directory
6. National Conference Sponsor Materials
7. 3rd Party information distributed by Advocis
8. 3rd Party Information distributed by Advocis Partners/Affiliates
9. Permission to disclose information to your employer

You can update your record to reflect which mailings you do not wish to receive. Advocis will continue to send you all mailings unless you modify your record through the Web to remove the mailing type.

To opt-out of mailings please fill in the privacy form on the members website at [www.advocis.ca](http://www.advocis.ca)

## **SECTION 12 HOW WE SAFEGUARD YOUR PERSONAL INFORMATION**

### *(a) General statement*

At Advocis we use best of breed technologies and maintain security standards to ensure that your Personal Information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

### *(b) Member and Customer Files*

Electronic Member and Customer files are kept in a highly secured environment with restricted access in an off-site location at Q9. Q9 is a state-of-the-art data centre that provides a highly secure physical infrastructure, including the latest in biometric authentication, video surveillance, and round-the-clock security officers, while at the same time permitting unannounced 7 x 24 customer access. The centres are engineered to eliminate any single point of failure, with multiple layers of redundancy in power systems, HVAC, and fire detection and suppression. All systems are monitored 7/24 through a Q9 Network Operations Centre (NOC).

Paper based files are stored in locked fire resistant secured filing cabinets at Advocis. All visitors are signed in and do not have general access to the storage areas.

(c) *On-line Security*

Advocis uses multiple layers of security controls to ensure that all recorded information in our files and computers systems are protected from unauthorized access and dissemination. Our systems are secured with combinations that may include layers of encryption, firewalls, and filtering routers monitoring outside access to our systems. It is equally important to Advocis that internal/remote user access is strictly controlled and monitored. We use multiple level password verification to ensure user authorization to our information systems. As additional security requirement if authorization attempts fail three times the user is locked out of our systems and can only be reactivated by an internal system administrator.

## **SECTION 13 HOW YOU CAN PROTECT YOUR PERSONAL INFORMATION**

(a) *Identification Number*

Advocis provides you with a personal identification number to aid in dealing with you. This ID is personal and should not be handed out as it allows access to your personal identifiable information. We will be using the identification ID, mailing address, and Birth City to validate you prior to handing out any information. We will ask you for your birth city or you can add it to your record on the members website.

(b) *Personal Information*

You should not share Personal Information with others unless you clearly understand the purpose of their request for Personal Information, and you know with whom you are dealing.

(c) *Online Security*

- When visiting web sites, locate the sites/company's Privacy Policy to determine how they will or will not use any information supplied by you.
- Use different passwords for different sites. A single password that became known or 'hacked' would easily provide access to all other sites where you use that password.
- When using the Internet use a secure browser that complies with recent/updated security protocols such as SSL (Secure Socket Layer) technology that encrypts or scrambles purchasing/transactional information.

(d) *Suspicious Solicitations*

From time to time Advocis will engage in promotional campaigns via telephone, mail, or email. If you are unsure that the promotion material that you receive is from Advocis, please call 1 800 563-5822 to verify that the campaign is a legitimate Advocis activity.

## SECTION 14 ACCESSING AND AMENDING YOUR PERSONAL INFORMATION

### (a) General

At Advocis, decisions are often based on the personal information which we have. Therefore it is important to ensure that your Personal Information is accurate and complete. As a Member, Customer, or Volunteer, you have the right to access, verify and amend the Personal Information held in your files either in person, or via telephone or by updating your record on the web

### (b) Accessing Your Personal Information

You may access and verify any of your regular Membership, Educational, Services, or Advocacy transactional Personal Information. You may not access and verify any of your Personal Information relating to a Disciplinary Procedure. Your membership, educational and transactional Personal Information is available for review as listed below:

	<b>IN PERSON</b>	<b>TELEPHONE</b>	<b>ON WEB</b>
Membership	X	X	X
Education	X	X	X
Transactional	X	X	N/A
Advocacy	X	X	N/A
Disciplinary	N/A	N/A	N/A
Purchases	X	X	N/A
Registrations	X	X	X

Should you have any questions regarding a decision that we have made, we will inform you of the reasons for the decision, if we are permitted to do so by law. If for some reason you are refused access to Personal Information held in your files, you may contact the Privacy Compliance Officer at Advocis. We will endeavour to the best of our ability to provide you with the information you require.

### (c) Amending your Personal Information

To help Advocis to keep your Personal Information up to date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our best efforts, errors do occur. Should you identify any incorrect or out-of-date Personal Information in your files, we will make the proper changes and provide you with a copy of the corrected Personal Information if so requested. Where appropriate, we will communicate these changes to other parties who may unintentionally have received incorrect Personal Information from Advocis.

You also have the ability to update your personal records by logging into the Members only area on the Advocis site.

### (d) To Make a Change

To make a change to the Personal Information contained in your file, please call Advocis at 1 800 563 5822 or email us at [info@advocis.ca](mailto:info@advocis.ca)

If you are a Member you may review and correct your membership Personal Information such as your name, address and contact Personal Information on line. To do so, go into the Advocis Web site [www.advocis.ca](http://www.advocis.ca) and login to the member's only area.

## **SECTION 15 ABOUT COOKIES**

### *(a) What is a Cookie?*

A cookie is a small text file containing a unique identification number that a Web site sends to your computer's web browser. While you visit a particular site, a cookie may be used to track the activities of your browser as well as provide you with a consistent, more efficient experience. There are two common types of cookies: persistent and non-persistent.

Persistent cookies are stored on your computer's hard drive where they remain resident until they are either deleted or they reach a predetermined expiration date. Persistent cookies are most commonly used to provide visitors with a customized experience by recording preferences such as how a visitor prefers to have his/her Web pages displayed. Additionally, cookies are commonly used to gather statistical Personal Information such as the average time spent on a particular page. This kind of Personal Information is valuable for several reasons, including providing insight on how to improve the design, content and navigation of a Web site.

Non-persistent cookies do not permanently record data and they are not stored on your computer's hard drive. Rather, non-persistent cookies are stored in memory and are only available during an active session. Once a session ends, the cookie disappears. Non-persistent cookies are used primarily for technical reasons such as providing seamless navigation. For example, secure Advocis Web sites use non-persistent cookies in order to permit visitors to navigate through the pages without requiring them to log on to each additional page they wish to visit.

### *(b) Why Were Cookies Created?*

The World Wide Web used the Hypertext Transfer Protocol (HTTP) to govern how files such as graphics, text and sound are exchanged over the internet. This protocol treats every action (e.g. mouse clicks) independently making the nature of the Web 'stateless'. This means that every time you click on a new page for instance, a new connection is established and all previous activity is forgotten.

To provide visitors with a more uniform experience, cookies were used originally to maintain relevant Personal Information as visitors viewed various pages of a Web site. In effect, cookies were created to bring state and consistency to the 'stateless' environment of the internet.

## **SECTION 16 COOKIES AND ADVOCIS**

### *(a) How Cookies are Used by Advocis*

Cookies may be used by Advocis Web sites to improve functionality and in some cases, to provide visitors with a customized online experience. The following section describes how cookies may be used by Advocis Web sites.

#### *(i) To improve functionality*

Advocis Web sites may use non-Persistent Cookies to improve operations and functionality. For example, these cookies improve navigation, maintain connectivity, and ensure online service sessions are secured. They do not contain

personal or financial Personal Information and they are not permanently stored for future use.

(ii) Site Personalization

Some Advocis Web sites use Persistent Cookies as a means of offering visitors a personalized experience if the user should specifically choose such an option on the web site. This currently is not available on Advocis.ca but is /will be available on cluinstitute.ca.

(b) *How Cookies are Not Used at Advocis*

Although Cookies have the capability of accomplishing a variety of undertakings, Advocis Web sites only use cookies when they provide an obvious benefit to you. The following describes how Advocis Web sites do not use cookies.

(i) Web Site Tracking (What sites you go to)

Cookies or other Personal Information tracking technologies are not used to follow the surfing behavior of visitors once they leave Advocis Web sites. Additionally, tracking Personal Information that may be gathered during a visit to an Advocis Web site will not be used for promotional purposes.

This may not preclude other web sites which may or may not be directly affiliated with Advocis in tracking from or to where you surf either coming to or leaving the Advocis web site.

(ii) User IDs and Passwords

For added security, cookies are not used to remember usernames and passwords when accessing highly secured pages like Member access only pages. You will be required to provide this Personal Information each time you log-on to a secured online service page.

(iii) Aggregated Analysis Attributable to an Individual Account

Advocis does not associate any of the Personal Information collected via cookies with your Personal Information.

(c) *Maintaining Personal Information in a Cookie*

Cookies are not designed to identify you personally; rather they are intended to enhance navigation and the security of your session.

We will only ask that you provide Personal Information if it is required to provide you with the Education, Services, Products or Advocacy you have requested. This type of Personal Information is collected only with your expressed consent, and it is not used for any purpose other than what was originally disclosed to you.

(d) *What are your choices in Relation to Cookies?*

Advocis does not use cookies to gather personal information about your or data residing on your computer. If and when cookies are employed by Advocis web sites they are not designed to identify you.

If you would like to browse the Advocis Web sites, you may do so without accepting cookies. However, you should understand that if you choose not to accept cookies, some Advocis Web sites may not function properly or optimally and you will not be permitted to access certain secured sites. For example, if you would like to use a service such as Member Only Access, you may be required to accept the cookies that have been engineered to sustain session integrity and enhanced security before proceeding.

Cookies are widely used and most Web browsers are configured initially to accept cookies automatically. If you prefer not to accept cookies, you may adjust your browser settings to alert you when a cookie is about to be sent, or you may configure your browser to refuse cookies automatically. If you would like to learn more about how to set your cookie options, please refer to your browser's documentation or online help for instructions.

## **SECTION 17 QUESTIONS, CONCERNS COMPLAINTS**

### *(a) Questions*

If you have a question about the privacy policies please call us at 1-800 – 563-5822.

### *(b) Concerns*

If you have a concern or complaint about privacy, confidentiality, or the Personal Information handling practices of Advocis, our employees officers or directors, please contact the Privacy Compliance Officer at Advocis whose name, address and phone number may be obtained by calling Advocis at 1-800-563-5822. or by visiting our Web site and clicking on Privacy.

### *(c) Complaints*

If you are not completely satisfied with our response you may contact the regulatory authority dealing with Privacy in your province, and if your province does not have a privacy law the federal authority dealing with privacy.

## **SECTION 18 UPDATING THE PRIVACY POLICY**

### *(a) Right and Obligation to Change*

Advocis may add, modify, or delete portions of this Policy when we think that it is appropriate to do so. Any change to the Policy or the way that it is administered must be incorporated into this Policy as soon as possible after the change in the policy or the administration of same is changed.

### *(b) Obligation to inform you of the Date of Change*

Advocis will inform you of the date of the change by noting the effective date of the change in the lower left hand corner of the Policy, and in the case of the Web sites in the lower left hand corner of the PDF file on each page.