

Privacy Policy

I recognize the trust you place in me when you share your personal information. I am committed to maintaining the accuracy, confidentiality, and security of your personal information.

This Privacy Policy applies to the personal information of my current, former, and prospective clients

It is my policy to comply with the privacy legislation of Saskatchewan.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact myself for more information.

What Is Personal Information?

For the purpose of the Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications (for example, an individual's business card).

What Personal Information Do I Collect?

I collect and maintain different types of personal information in respect of my current, former and prospective clients. The nature and extent of the personal information collected will depend on the nature of the service that I provide to you. For example, where you have retained me to:

- prepare your tax returns, I may collect the personal information required to complete such returns, including your social insurance number, date of birth, age, gender, marital status, source and amounts of income, deductions and taxes paid and payable, and information concerning your dependents, pensions, RRSP's, charitable contributions and medical deductions;
- provide audit, review, notice to reader, bookkeeping, or consulting services I may collect the personal information required to perform such services, including the information contained in your accounting records, financial statements and transaction records, payroll and employee withholdings records, and corporate, partnership or similar records; and
- provide estate planning, corporate restructuring or valuation services I may collect personal information required to perform such services, including the personal information contained in your personal tax returns, corporate tax returns, accounting records, financial statements,

transactions records, insurance records, wills, codicils and other testamentary documents and corporate, partnership or similar records.

In order to establish and manage your client relationship I may collect your:

- contact information, such as your name, address, business or home telephone numbers
- billing information, such as methods and preferences for billing and payment
- business or other relationship information, such as information related to your agreements, preferences, advisors and decision-makers, and
- feedback and any other information that you may voluntarily disclose to myself.

Generally, I prefer to obtain your information directly from you; however, I may also collect your information from other sources if you have consented to have them provide the information to myself.

From time to time, I may utilize the services of third parties. As such, I may receive your personal information collected by those third parties. Where this is the case, I will take reasonable steps to ensure that such third parties have represented to me that they have the right to disclose your personal information.

Why Do I Collect Personal Information?

I collect your personal information so that I can manage and further develop my business relationship with you. As well, I want to provide you with the services that you have requested (for example, personal or corporate tax preparation, audit, review, notice to reader, bookkeeping or budgeting services, estate or tax planning or other consulting services). In addition, I may collect personal information:

- to be able to review the services that I provide so that I may understand your requirements and be able to work to improve my services;
- to be able to advise you of my services or to provide information that I believe may be of interest to you (for example, I may send you a newsletter from time to time);
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number);
- to allow myself to communicate with you;
- to protect against error, fraud, theft and damage to your goods and property that are in my possession (for example, your financial records); and
- to comply with applicable legal or regulatory process.

How Do I Use and Disclose Your Personal Information?

I may use or disclose your personal information for the purpose described in the Privacy Policy. I may also use or disclose your information for any additional purposes for which I have obtained your consent. Further, your personal information may be used and disclosed:

- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- during emergency situations to protect the safety of a person or group, or to protect my rights and property;
- where the personal information is publicly available; or
- with my contractors, consultants and other parties who require such information to assist me with managing my relationship with you (for example, income tax lawyers);

I will not disclose your information to third parties to enable them to market their products or services to you without your consent.

In addition, personal information may be disclosed or transferred, under your consent, to another party during the course of a change in ownership of all or a part of my firm (for example, sale of selected client files: merger with another chartered accounting firm; or joint venture arrangement with another chartered accounting firm). This disclosure or transfer will only be done with a party that is bound by appropriate agreements and is required to use or disclose your personal information in a manner consistent with this Privacy Policy.

Your Consent Is Important To Me

Generally, your knowledge and consent are required for the collections, use and disclosure of your personal information. Depending on the sensitivity of the personal information, your consent may be:

- implied – consent that can reasonably be inferred from your action or inaction;
- deemed (using an opt-out mechanism) – implied consent to collect, use, retain, and disclose personal information unless the individual explicitly denies permission. For example, when you retain me to provide services, I will assume your consent to the collection, use and disclosure of your personal information for purposes related to the provision of such services; or
- express – consent that is given orally, electronically or in writing.

Typically, I will seek your consent at the time that I collect your personal information (for example, through an engagement letter). In certain circumstances, your consent may be obtained after collection but prior to my use or disclosure of your personal information. If I plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), I will advise you of that purpose before such use or disclosure.

I assume, unless you advise me otherwise, that you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting myself using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to myself. Withdrawal of consent may, however, affect my ability to continue to provide services to you.

I may collect, use or disclose your personal information without your knowledge or consent where I am permitted or required to do so by applicable law or regulatory requirements.

How Is My Personal Information Protected?

I endeavor to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These are designed to protect against loss and unauthorized access, copying, use, modification or disclosure. I follow these processes:

- Hard copy client data (for example, paper records; computer media; etc. are received and stored within my offices in a way that protects them from unauthorized scrutiny. Client data is returned to the client at the completion of the engagement.
- Client data received over the phone is stored within my voice mail system until the intended I retrieve the information. The data may contain personal information. Once the voice mail message is received, it is deleted from the memory system.
- Client data received via e-mail is stored on my stand-alone computer (see comments below), and possibly on my notebook computer. This data may contain personal information. Messages are retrieved either directly from the e-mail or alternatively the message is printed and filed in the client's file. These e-mail messages, once retrieved, are eventually deleted from the stand-alone desktop and notebook computers.
- My working paper files. When not being used they will be stored in a discreet manner within my paper filing system. Files are locked within the paper filing system to prevent unauthorized access.
- My computers files (for example, program files and client data files) are stored within my computer system. This system is password protected. Daily electronic backups are performed on the computer.
- My computer files (for example, program files and client data files) may also be stored on portable notebook computer. The computer is password and finger print protected. Client data files will only be stored on the notebook computer while I am working on your file at an alternative location (for example, at the client's premises). Client data files previously stored on the notebook computers is transferred to the stand-alone computer. This will be done when the I returns to my office. Once the transfer of client data is complete, the files are deleted from the notebook computer.

What If My Personal Information Changes?

I endeavor to ensure that the personal information retained by myself remains accurate, complete and relevant for the purposes identified. If your personal information changes please let me know so that I may update my records. When requesting a change to your personal information, I may request specific information from you to enable myself to confirm your identity and right to update or change the personal information that I hold. In some circumstances, I may not agree with your request to change your personal information and will instead endeavor to append an alternative text to the record in question.

Can I Access My Personal Information?

You may ask to review your personal information held by myself. If you want to review your personal information, please contact myself. Please note that any such communication must be in writing.

When requesting access to your personal information, I may request specific information from you to enable myself to confirm your identity and right to access, as well as to search for and provide you with the personal information that I hold about you. I may charge you a fee to access your personal information; however, I will advise you of any fee in advance. If you require assistance in preparing your request, please contact me.

Your right to access the personal information that I hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require me to refuse to provide some or all of the personal information that I hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that I cannot provide you with access to your personal information, I will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Revisions and Interpretation

I may make changes to this Privacy Policy to reflect changes in my legal or regulatory obligations or in the manner in which I deal with your personal information. I will post any revised version of this Privacy Policy on my website (www.elizabethtorrens.com) and I will encourage you to refer back to it on regular basis. This Privacy Policy was last updated on January 24, 2012.

Any interpretation associated with this Privacy Policy will be made by myself. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word “including” is used, it shall mean “including without limitation”. This Privacy Policy does not create

or confer upon any individual or myself any rights or obligations outside of, or in addition to, any rights or obligations conferred or imposed by Canada's federal and provincial privacy laws, as applicable.