

Introduction

As of January 2004, SFP is subject to Part 1 and schedule 1 of the Personal Information Protection and Electronic Documents Act (Canada) (“**PIPEDA**”), in regards to collection, usage or disclosure of “personal information” in the course of business activities.

[Shah Financial Planning Inc., - hereinafter called “*SFP, our, us, or we.*” Whereas Client(s), Client’s spouse or companion, Client’s dependants - hereinafter called “*you, your, or client(s)*” and/or addressed individually.]

Privacy Procedures

SFP’s aim is to be the premier provider of enduring services for clients. In fulfilling our aim, we are committed to protecting your privacy and maintaining the confidentiality of your personal information.

When asked to provide Personal Information, you may choose not to provide any or all information. As a result, we may not be able to offer you certain products and services without necessary Personal Information as the information allows us to execute business activities in order to offer you products and services objectively.

1. **Personal Information:** Personal Information refers to the information we require from you to understand your needs to provide products and ongoing services. This includes information provided to us by you:
 - **Client Information:** This information is about an identifiable individual client, his or her spouse or companion, and dependants. This includes their names, telephone numbers, home addresses, dates of birth, marital status, employment history, social insurance number, driver licence and etc.
 - **Financial Information:** This information is about client and spouse or companion’s financial matter. This includes their salary, registered and non-registered investments, savings, financial institutions/banking information, house, auto and other assets owned. Also, includes any short and long term debts - mortgage, loans, credit cards and personal line of credit payments, and other debts.
 - **Risk Management Information:** This information about client and spouse or companion’s insurance on their house, mortgage, auto, life, critical illness, disability, long care, and health.
 - **Other Information:** This information about client and spouse or companion’s account information, such as beneficiaries, trading authorization, power of attorney, and other individuals with financial interest, for their accounts we managed. Also, investment information, such as their financial objectives, and investment knowledge, objectives, time horizons, risk tolerance, return expectation.
2. **Methods for Collecting Your Personal Information:** Personal information as stated in item #1 is collected directly from you when requesting products and services we offered. With you we prepared KYC - Account Profile, known as “Know-Your-Client” form, account application form, account transfer form, and other forms and documents for SFP’s services.
3. **Use of Your Personal Information:** SFP may use your personal information for these stated purposes:
 - Identifying you;
 - Establishing and managing your account;
 - Ensuring the information in our records is accurate;
 - Analyzing the information to identify and/or understanding your needs;
 - To recommend solutions and suitable products;
 - To offer and/or provide you products and ongoing services offered by SFP;
 - Executing business activities for servicing you;
 - Verifying previously given information when necessary;
 - Providing you account statements and other account related information;
 - Communicating with you regarding service offering or products which may be of interest to you;
 - Meeting legal and regulatory requirements.

We do not sell your personal information. We may use your information for general research in an effort to enhance our services and product offerings.

4. **Disclose of Your Personal Information:** We disclose your information to our vendors or other organization only for the purpose h that set out in this Privacy Policy and for no other purpose. Third parties (other than the SFP) who may be provided with your personal information are:
 - Financial institutions including mutual fund companies and the carrying dealers with whom we have to execute business activities to offer you products and services.
 - Canadian governments, government agencies and regulators.
 - Third parties who perform services for us such as B.O., auditing, mailing, courier deliveries, imaging and document storage.
 - Entities to whom we are legally obliged to provide information.

We may disclose your personal information when we believe in good faith that such disclosure is required by and in accordance with the law. We may also disclose your information in connection with corporate reorganization, a merger or and amalgamation with another entity, or a sale of all or a substantial portion of your assets. In this case, we would ensure that the information disclosed continues to be used only for the purposes permitted by this Privacy Policy and by the entity acquiring the information.

5. **Protection of Your Personal Information:** SFP is as concerned with protecting your personal and confidential information as you are. We have taken all appropriate measures and put in place controls aimed at safeguarding your personal information. These measures include restricted physical access to our office beyond the reception area, and records, passwords and file encryption for on-line activities. SFP’s employees/agents and service providers have access to your personal information only for the purposes set out in this policy to enable them to perform their duties in servicing clients.

6. **Retention of Your Personal Information:** We only keep your personal information for as long as it is required (whether to provide you with services or as required by law or regulations). How long we keep your information depends on the reasons for which it was collected. The type of product or service and the kind of information also affects the length of time for which we retain information. Your information may be kept even if you are no longer a client with the SFP so long as it is legally necessary for us to have sufficient information to respond to any issues that may arise at a later date. Once your personal information is not required, it is destroyed in accordance with a norm of business practice.
7. **Access and Update Your Personal Information:** We provide you access to your personal information on your written request. You may view or verify your personal information by the SFP's authorization or in presence of the SFP's employees/agents. Our verification procedures help to minimize risk that such information is released to anyone not authorized to receive it. We will provide you with the requested information within due time of receipt of your written request, unless prohibited by law. Except under limited circumstances, you may ask us to amend or update your personal information at any time. Upon an annual review or on request consultation meeting your personal information may be amended. SFP reserves the right to charge you for our costs incurred in providing the information requested. SFP may not be able to provide you with full access to your information if:

- It contains references to other persons;
- We would have to disclose proprietary information confidential to the SFP or its affiliates;
- It has been destroyed;
- It is too costly to retrieve;
- It cannot be disclosed for legal or regulatory reasons;

We would give you an explanation, if we were unable to provide you with access to your personal information.

8. **Resolution of Your Concerns:** Your issue or concern may be easily resolved by contacting the person involved:

Telephone: (416) 298-4900, Fax: (416) 298-9759

If speaking to the person involved does not resolve your concern, you may contact the general manager who is the appointed Chief Privacy Officer of the SFP, at the above numbers.

9. **Change in this Privacy Policy:** In future, if necessary or desirable to change the SFP Privacy Policy, we will notify you of changes in our correspondence, and/or our news letter to clients, or notify of it on our website as soon as they go into effect. You have a right to know at all times what information we collect, how it is used, and under what circumstances we can disclose it. Any change to this policy will become effective on the date the change is notified. You will be able to see the effective date on the top right corner of the first page of this Privacy Policy. We recommend that you print a copy of the updated policy for your reference and revisit it from time to time to ensure you are aware of the changes.

10. **Consent or Withdraw Your Consent - to Use or Disclose of Your Personal Information:** In providing information to us and continuing to conduct business with the SFP, you are consenting the use of your personal information.

You may object or withdraw your consent to use or disclose your Personal Information already on file at any time by contacting us at (416) 298-4900. Otherwise, it is considered you agreeing in tacit, or "deemed" consent. In the case of your objection or withdrawal of your consent, you may limit the services or products we are able to offer you.