



Privacy Issues – Questions and Answers

Q1. Is my privacy protected by Assante?

Assante follows the fundamental principles of privacy protection contained in the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”). These standards ensure that you have control over your personal information by requiring that we obtain your consent to collect, use or disclose information about you.

Q2. What exactly is PIPEDA?

PIPEDA is federal legislation that sets out the ground rules for how organizations may collect, use or disclose information about you in the daily course of business. It will come into effect for securities and mutual fund dealers on January 1, 2004. It gives you the right to see and ask for corrections to information an organization may have collected about you. It also sets out the right to complain if you think an organization covered by the Act is not living up to its responsibilities under the law.

Q3. What is personal information?

"Personal information" under PIPEDA means information about an "identifiable individual." Assante will only collect the information we require. But under PIPEDA, certain information from other groups may include:

- name, age, weight, height
- medical records
- income, purchases and spending habits
- race, ethnic origin and colour
- blood type, DNA code, fingerprints
- marital status and religion
- education
- home address and phone number

"Personal information" does **not** include the name, job title, business address or office telephone number of an employee of an organization that is covered by the new law.

Q4. Why does Assante need to collect and use personal information about me?

We collect a lot of information every time we open an account. Our regulators require that we have a complete understanding of each client's personal and financial circumstances to open an account and make suitable investment recommendations. We are also required to keep additional information on file to comply with anti-money laundering and tax reporting requirements. Because we need to have access to certain fundamental personal information about every client to operate an account within the boundaries of regulatory restrictions, we require consent to the collection and use of this



information before we can open the account. A more detailed list of purposes and uses is set out in the Assante Privacy Policy on our Web site at www.assante.com.

Q5. How is consent for the collection and use of information given?

Consent may be express or implied and may be obtained in a variety of different ways under the legislation – in writing or verbally. We collect most of the information we require at the time an account is opened through the completion of the Assante New Client Application Form. By signing the New Client Application Form, clients consent to Assante collecting and using the information to make the most suitable investment decision we can for you. In some cases, we may require additional personal information and we will ask for your written consent for the use and collection of this at the time it is collected.

Q6. What protections are available under PIPEDA?

PIPEDA gives you the right to:

- know why an organization collects, uses or discloses your personal information;*
- expect an organization to collect, use or disclose your personal information reasonably and appropriately, and not use the information for any purpose other than that to which you have consented;*
- know who in the organization is responsible for protecting your personal information;
- expect an organization to protect your personal information by taking appropriate security measures;
- expect the personal information an organization holds about you to be accurate, complete and up-to-date;
- obtain access to your personal information and ask for corrections;*
- complain about how an organization handles your personal information.

PIPEDA requires all organizations to:

- obtain your consent when they collect, use or disclose your personal information;*
 - collect information by fair and lawful means;
 - have personal information policies that are clear, understandable and readily available.
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- Exceptions to these principles may exist where, for example, the information is required by law or is being compelled by an enforcement agency for an investigation.



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Q. 7 Are there other rules on privacy issues?

PIPEDA will apply federally, unless provincial legislation that is substantially similar to it has been enacted. At present, Quebec is the only province with a personal data protection law in effect that applies to the provincially regulated private sector. This law, in addition to regulating the collection, use and disclosure of personal information held by commercial enterprises, also provides Quebecers with a general right of access to and correction of personal information. The provinces of British Columbia and Alberta have advised that they also intend to put privacy legislation into effect in the near future.

There are also some sector-specific privacy rules that apply to certain types of information, such as medical information. We will also observe these rules as they apply to information we obtain at Assante.

Q8. How do I have any concerns about privacy issues addressed?

We have appointed a Chief Privacy Officer to deal with any concerns you may have on privacy issues. You may contact this individual in writing at the following address:

Assante Privacy Office
Suite 600
800 Bay St.
Toronto, Ontario
M5S 3A9

Attn.: Chief Privacy Officer

Alternatively, you may contact us by phone at 1-800-268-3200 or e-mail at privacyoffice@assante.com.

Q9. How can I see the personal information Assante has about me?

Send a written request addressed to our Chief Privacy Officer. You should provide enough detail to allow us to identify the information you want. For example, include dates, account numbers, and the names or positions of people you may have dealt with at Assante.

Q10. How can I correct errors or omissions in my personal information?

Again, send a written request to our Chief Privacy Officer and explain the correction you are requesting. Supply copies of any documents that support your request, if you have them.