

Attachment 10.

Privacy Policies and Procedures

Definitions:

Personal Information (Information):

Any information that identifies an individual that is not a business name, business address, business telephone number, or job title.

Commercial Activity

Any activity we perform or provide for our clients or prospective clients.

Consent

For the purposes of this policy, consent includes the client's permission to collect, hold, use, and disclose their personal information in accordance with the Alpha Financial's Privacy Notice.

PIPEDA Principles:

The Policy is based on the ten principles of fair information practices set out in Schedule 1 of the Personal Information Protection and Electronic Documents Act and is as follows:

1. **Accountability:** the Alpha Financial is responsible for personal information in its possession or control, including personal information that the Alpha Financial transfers to service providers to perform functions on the Alpha Financial's behalf. The Alpha Financial has designated a Chief Privacy Officer who is accountable for the handling of such personal information.

Joey Zhang is the Privacy Officer for Alpha Financial. If clients have a concern with how Alpha Financial is applying the provisions of the PIPEDA, the client is to first contact the Privacy Officer directly by email at Joey Zhang, or by telephone at 604-233-2233 ext 233, or by regular mail at 300-4940 No.3 Road Richmond, BC V6X 3A5.

All correspondence and/or contact from clients that is directed to the Privacy Officer will be investigated. Such investigation will include a detailed review of the situation and the Privacy Officer will be given a chance to address the client's concern. Should such efforts fail to rectify the situation the Director responsible for privacy will then get involved directly with the client.

2. **Identifying Purpose:** either before or at the time any personal information is collected, the

Alpha Financial identifies to the individual the purpose for collecting the personal information.

At all times, staff and agents must identify in writing the purpose for obtaining client's consent. The preferred method is the staff and/or agents notes to the client's file properly dated as to when the purpose for collecting the Information was discussed. While a client's signature on any form is clear indication of explicit consent. In order to be deemed to be explicit, notes to the client's file must have the date of the meeting and clear indication that the member gave consent. No signature is necessary.

3. Consent: the collection, use and disclosure of personal information is only done with the knowledge and consent of the individual, except in circumstances permitted or required by law. Every reasonable effort is made to ensure that the individual understands how her or his personal information will be used.

No staff person or representative may conduct business with anyone that has not provided his or her consent. Consent can be given verbally provided it is recorded in the client's file and dated. Further, consent may be implied or explicit. When obtaining consent, all clients should be referred to the Alpha Financial Privacy Notice. If a client does not wish to consent to any part of the Alpha Financial Privacy Notice, then the withdrawal of consent **MUST** be documented in the notes to the client's file with the date and the privacy officer notified as soon as possible. The privacy officer will document the situation and ensure that the staff person or representative has taken the appropriate action to accommodate the client's wishes.

4. Limiting Collection: the collection of personal information is limited to that which is necessary for the Alpha Financial to accomplish the identified purposes.

The reasonable person rule must be adhered to at all times and the purpose for which the personal information was collected must be documented. Documentation can be by: client's written instruction, registration form, notes to the client's file, or similar correspondence. All verbal consent must be documented with the date received in the client's file.

5. Limiting Use, Disclosure and Retention: the Alpha Financial only uses or discloses personal information for the purpose for which it was collected. The Alpha Financial only retains personal information for as long as it is necessary to fulfill that purpose. The Alpha Financial does not disclose an individual's personal information to third parties, except if required in the course of fulfilling the purpose for which it was collected.

Retention Periods:

Once Information is collected, it may only be retained on the client's file for as long as the client has consented to its retention. All collected information is retained in the client's file. This does not apply to credit card information which Alpha Financial does not retain, nor has the ability to retain. The only exception is when a legal requirement dictates that the Information be retained for a specified period of time. For greater clarity, financial information must be retained for CRA audit purposes for a period of 6 years.

Destruction of Information – Electronic Files

In accordance with the aforementioned retention periods, Information must be promptly deleted from all electronic files when the purpose for which the Information was collected, or when consent to hold such Information has expired. External suppliers are bound to the same requirements under PIPEDA or similar provincial legislation.

Destruction of Information – Paper:

All paper files that contain Information must be promptly shredded either on-site at Alpha Financial or by a confidential shredder service.

Information Destroyed In Error:

It is important to note that the Information can be destroyed, but not the consent. Should Information be destroyed, the staff person or representative must determine if the consent to collect, hold, and distribute the Information is still valid. If so, then the Information may be reconstructed, replaced, or collected again provided it is for the same purpose as consented to originally. If the status of consent is uncertain, then the staff person or director must contact the member and ensure that proper consent is obtained before replacing, or reconstructing lost Information.

6. **Accuracy:** personal information is kept as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. An individual may ascertain the accuracy and completeness of the personal information held by the Alpha Financial and have the information amended if it is not accurate or complete.

Updating Information:

Any errors in client Information must be corrected within 14 business days. Any client requests for corrections to Information must be documented in the member's file with the date received and the date the correction was made. All requests to update client Information should be in writing, dated, and filed in the member's file. Verbal requests must be documented with date received in the client's file.

7. **Safeguards:** personal information is protected by security measures appropriate to the sensitivity of the information. Security measures include restricted access to computers and locks on filing cabinets.

Computerized Information - Network:

Client information stored on the Alpha Financial's Network must be protected by secure passwords.

Computerized Information – Desktop and Laptop Computers:

At all times, client Information is the corporate property and responsibility of Alpha Financial and must be stored on the network computers. Copies may be retained on desktop and/or laptop computers for occasional business use. No original Information may be stored solely on desktop or laptop computers. Laptop computers must never be left un-attended for any reason. Once available, security software will be installed on all laptop computers to provide reasonable

protection against unauthorized access to member Information that may be stored on the computer. All password security software will be updated on a continual basis.

Protection Systems for Network Computers:

All network computers have weekly backups to the server for brief power outages, firewalls, and anti-virus software. Access to the Alpha Financial offices is restricted to staff only and protected by an alarm system. Network computers are not left unattended unless protected from access by a locked door or a locked cabinet.

Computers that are no Longer Required:

Any computer that is no longer required at Alpha Financial must first be cleaned of all client Information. The staff or representative is responsible for notifying the Alpha Financial and ensuring that the procedure was completed prior to the computer leaving Alpha Financial.

Portable Data Storage Devices:

If personal data devices such as palm pilots, cellular telephones, and so on contain client Information, they must never be left un-attended unless secured with a locking device such as a door or locked filing cabinet. When taken outside of Alpha Financial, such devices must be password protected and such security protocols enabled.

Client Information stored in Paper Files:

Client Information stored in paper files is protected from un-authorized access by the building security systems, locking room doors, and/or locking filing cabinets. Client files are not left un-attended unless secured.

Client Paper Files Temporarily Removed from the Building:

Client Information stored in paper files must be secured at all times. If temporarily removed from the building (e.g. client meeting), then the Information must be protected from unauthorized access. At a minimum, all Information must be obscured from direct view to avoid unauthorized reading of the material and protected by some sort of locking mechanisms.

8. **Openness:** the Alpha Financial makes readily available to individuals information about its privacy policy and practices related to the Alpha Financial management of personal information.

At all times, staff and representative must be familiar with the Alpha Financial Privacy Notice posted on the website. Any questions with regard to the Notice, or requests for interpretation of the Alpha Financial policies and procedure for compliance with PIPEDA or similar provincial legislation should first be directed to the privacy officer. Full name, address, and other contact information for the Privacy officer as well as a description of the procedure for making a privacy complaint are clearly outlined on the Alpha Financial Privacy Notice.

Procedure for New clients:

The staff and representative must ensure that all new clients are made aware of the Alpha Financial privacy notice. Should the clients not agree with any provision of the Notice, then the staff must document with date the problem and make suggestions as to how to address the client's concern. The Privacy Officer must be notified immediately of any such event in order to

review the notes to file and ensure that the recommended procedure for handling the client's concern is adequate.

Complaint Process:

If a client is not content with how his/or her advisor is complying with the terms and conditions of PIPEDA or similar provincial legislation as detailed in the Alpha Financial Privacy Notice, then he or she may file a complaint with the Privacy Officer as follows:

- by confidential letter mailed to Joey Zhang, 4940 No.3 Road, Richmond BC, V6X 3A5, or
- by email at Joeyzhang@alphafinancial.ca, or
- in person at the mailing address above, or
- by phone at 604-233-2233, ext 233

Should a complaint be filed with the privacy officer, the privacy officer will:

- ensure that complaint is properly documented and signed by the client.
- notify the parties involved in writing that a complaint has been filed and seek a meeting (conference call) to discuss the issues,
- document the discussion with the staff or representative and formulate a plan to deal with the complaint,
- notify the client in writing the results of the meeting and inform them of the proposed solution,
- if required, meet again with the client and/or the parties to mediate a solution to the problem.

9. **Individual Access:** upon the written request of an individual, the Alpha Financial will inform the individual of the existence, use and disclosure of her or his personal information. An individual will be given reasonable access to her or his personal information, and will be able to ascertain its accuracy and completeness except in certain circumstances, consistent with personal information statutes across Canada. Where access is not provided, the Alpha Financial will explain why access was not provided.

Alpha Financial May Refuse Access when:

- solicitor-member privilege,
- non-removable confidential commercial information,
- disclosure could harm the individual life or security, it was collected without the individuals knowledge or consent to ensure accuracy and the collection was required to investigate a breach of an agreement or contravention of a federal or provincial law (the Privacy Commissioner must be notified),
- it was generated as part of a formal dispute resolution (e.g. divorce).

Privacy Officer will determine if a request falls into any of the above.

10. **Compliance:** individuals having questions about how the Alpha Financial handles personal information or wishing to inquire about compliance with the above principles may contact the Alpha Financial's Chief Privacy Officer, as follows:

- by phone at 604-233-2233-233
- by mail to Privacy Officer, Joey Zhang, 300-4940 No.3 Road, Richmond BC, V6X 3A5,
or
- by email to joeyzhang@alphafinancial.ca.