

# Tonin & Co. LLP Privacy Policy

Tonin & Co. recognizes the importance of maintaining the privacy, security, and accuracy of personal information for our clients.

We are committed to protecting the privacy of all our clients. We protect your information from unauthorized use or disclosure to any unauthorized source.

This Privacy Policy has been designed to provide information about how we safeguard your information. We take this policy extremely seriously. We hold in confidence all information concerning the business and affairs of our clients acquired in the course of our professional relationship.

The terms of Tonin & Co. Privacy Policy are in accordance with applicable laws including the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

## Personal Information

Personal Information, for the purposes of this policy, is any information, which enables an individual to be identified. The type of information we collect may depend upon the services required; information collected may include: name, address, email address, contact information, financial, credit billing and account information, employment, salary, benefit or tax information and other information relevant to the service we are providing or about to provide.

### The Purpose of Collecting Personal Information

Personal Information is collected to assess whether Tonin & Co. is able to enter into a professional relationship with a person or an organization. Other than, at the outset of the business relationship, it may be collected during your relationship with the Firm to ensure up-to-date information, or it may be collected to reflect changes in the law. We use the information to offer and provide you with the services you need and to enable us to gather the information needed to provide the service. The information is held in confidence, and we do not disclose your personal information to any third party unless authorized by you.

We limit the information we collect to that which is needed for the purposes of our business relationship. We will obtain your consent before using your information for any other purpose and before collecting information about you from third parties. From time to time, we may be required to collect information directly from third parties such as; Canada Revenue Agency (CRA), or other government agency or registry or third parties with whom you have had or have a professional relationship and where information from that relationship is relevant to the services we provide to you.

By providing Personal Information to our Firm, you agree and consent that we may collect, use, and disclose your Personal Information in accordance with this Privacy Policy and any other applicable privacy legislation. If you choose not to provide required Personal Information, we may be restricted in the services we are able to offer to you.

To protect their own interests, individuals or organizations should not send confidential information to Tonin & Co. until they have had a direct discussion with a professional at the Firm about Tonin & Co.

We do not disclose Personal Information to organizations, which perform services on behalf of our Firm unless it is specifically relevant to the work we are doing for you. Personal information will only be provided to such organizations if they agree to use such information solely for the purposes of providing services to Tonin & Co. and under the instruction of Tonin & Co. Further, they must agree to act in a manner consistent with the principles articulated in this Policy.

There are circumstances where Tonin & Co. may collect or disclose personal information without your consent, for example, to collect a debt you owe to the Firm, or to comply with legal requirements. Under these circumstances, Tonin & Co. will not disclose more information than is required.

# Business Development and Marketing

From time to time, we may send you information, updates, or marketing materials. We will provide this to you only with your consent. If you prefer not to receive promotional material from Tonin & Co., please email us at <u>general@tonin.ca</u>.

## Accuracy and Access

We maintain a file of your personal information for business purposes. To the extent possible, we ensure that Personal Information is accurate and up to date. Should you wish to access your personal information, please contact our Privacy Officer listed at the end of this policy. If the information may compromise others' right to privacy, we will not provide personal information and the reason for denial of access will be communicated to you. We ask that clients ensure that all relevant personal information and any change to personal information be communicated to the Firm.

# **Retention**

Tonin & Co. keeps Personal Information as long as required by the rules of our profession. This length of time may vary depending on the product, service, or nature of the information. This period may extend beyond the end of our professional services relationship but only for as long as is necessary for us to have sufficient information to respond to any issues that may arise at a later date related to our business with you. Tonin & Co. protects your privacy by making every reasonable effort to keep your personal information in a secure location.

## Security

At all times we endeavor to maintain adequate physical, procedural, and technical security with respect to our office and our information storage facility to prevent loss, misuse, unauthorized access, disclosure, or modification of Personal Information. We are careful to keep Personal Information secure if and when it must leave our office or storage facility.

Related to communication from you to the Firm, please note there is no method of transmitting or storing data that is completely secure. Mail, telephone calls, faxes and transmissions over the internet are susceptible to possible loss, misrouting, interception, and misuse of the information being communicated or transmitted.

We attempt to strike a balance between security and convenience. In communicating with clients and others, we may request the right to use a method of communication that is less secure.

#### Tonin & Co. Website

The only Personal Information we collect on our website is the information you voluntarily provide. We do not employ any electronic means to automatically collect personally identifiable information from any visitor or user of our website or from their computers. We may use your Personal Information collected through our website to respond to your inquiries or to contact you, but unless we are specifically informed by you, we are not aware, nor do we have any information, that you have visited our website.

#### Your Questions

If you have any questions about accessing your Personal Information, our collection, use or management or disclosure of Personal information or this privacy policy, please contact the Firm's Privacy Officer at general@tonin.ca.

By using this website and providing information to Tonin & Co., you approve and agree to the collection and use of your personal information for the purposes listed in this policy. Tonin & Co. will regularly review our Privacy Policy to ensure that it is accurate and reflective of any requirements by law. You may wish to review the privacy policy from time to time.