

Privacy compliance policies and procedures

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The federal law also established a **Privacy Commissioner** as an oversight mechanism. Consumers have the right to file a complaint about any aspect of compliance with PIPEDA. Clients are entitled to file a complaint against a financial institution (or dealer's) for its apparent breach of compliance with the measures in the federal law for protecting their personal information. To resolve complaints, clients should initially be encouraged to use a financial institution's (or dealer's) own internal redress body.

The Privacy Commissioner is empowered to:

- receive complaints
- conduct investigations
- attempt to resolve complaints
- audit the personal information management practices of an organization.

Compliance with the Securities Acts

Security

Those engaging in Internet commerce dealing with financial transactions and personal information need to know that the communications are protected. There are many facets to how I protect such information.

Security Measures

I engage in a number of security activities to help ensure the safety and privacy of your personal information. This includes adopting measures to help secure my computer against hacker attacks and virus activities by a number of different means. I monitor our website, servers, email, data and protecting your digital information with the antivirus technology. Keeping my confidential data safe from ransomware and phishing.

Computer Security

My computer in the company is encrypted and has a password to log in.

My computer has firewall and antivirus which are up to date.

All software including Microsoft Windows is updated regularly.

My computer has malware software which is up to date.

The company stores clients' files on a separate paid and encrypted cloud site located in Canada.

The corporate email is paid, server is encrypted and has 2 step authentications.

All clients info is located in Canada.

All passwords the company uses are different from each other and they consist of random letters and

Physical Security

The company has no leased equipment and owns all its hardware.

In case of a theft the stolen computer can be easily disconnected from the server with the clients information, it will prevent an access to the info even if it will be possible to remove the password and un-encrypt it.

Operational Risks are mitigated

The company uses 2 daily backup systems, which are local on separate disks and one is in the cloud. All physical backup disks are encrypted. By unplugging them from the electricity they become inaccessible without a password which is at least 8 characters of random letters and digits

The company has cybersecurity insurance in case it becomes a victim of such attack.

Compliance with Code of Conduct

Acting in compliance with regulations and codes of conducts

Agents have a responsibility to act in compliance with the regulations and requirements applicable to them in the various regulatory documents they will read and sign.

As an insurance agent *, I will:

- Continue to meet professional ethical standards, including acting honestly, with integrity and fairness. I will not intentionally mislead clients in any way.
- Understand my clients' interests to the best of my ability by obtaining, confirming and documenting information about their needs. I will reasonably ensure that I recommend products or services that meet those needs.
- Put my clients' interests before my own or the interests of others. I will always act in good faith.
- Collect enough information about my clients to reasonably determine their identity. I will also collect enough information about my clients' intended transactions to feel certain that they are lawful, and if I have reasonable grounds to suspect the transaction is unlawful, I will report the situation to the appropriate authorities (regulators and/or law enforcement).
- Protect my clients' personal information, ensure it is only used for the purpose for which it was collected, and only share with people who need to see it to meet that

purpose.

- Maintain an appropriate level of education to ensure I am up to date in an everchanging financial marketplace.
- Tell my clients about any conflicts of interest that may be perceived as creating a bias on my part. This advice will be given prior to any financial transactions
- Provide my clients with written disclosure of:
 - the financial companies I do business with;
 - the nature of my relationship with any company I recommend; and,
 - how I am compensated including additional compensation or incentives I may receive.
- Provide, at any time, any additional information my clients' request.

I agree that my responsibilities are not limited to those above.