

# **Privacy Policy**

## **Our Commitment**

The Famiquity provides a range of services to users. The Famiquity recognizes the importance of privacy and the sensitivity of personal information. Famiquity is committed to protecting any personal information we hold. This Privacy Policy outlines how we manage the personal information and safeguard the privacy of our users, service providers and other individuals ("you").

It is important for you to be aware that from January 1, 2004, all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. PIPEDA gives you rights concerning the privacy of your personal information.

Famiquity is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this Privacy Policy, and trained our support staff about our policies and practices.

## **Personal Information**

For the purposes of this Privacy Policy, personal information is given the same meaning as it is given in applicable privacy legislation from time to time. As defined currently in Canadian privacy legislation, personal information is defined as any information that identifies an individual, or any information by which an individual's identity could be deduced. In general, personal information does not include what is generally considered to be business contact information, including your name, title or position, business address, telephone number or facsimile number.

The types of personal information that we may collect from you include your name, e-mail address, information about your finances, information about your relationships with spouses and/or partners, activities, contact information of people you refer to us, family members, beneficiaries, directors, officers, employees, adverse parties, parties-in-interest, investigators, decision makers, experts, other professional advisors, and our clients' business partners, investors, shareholders, and customers whom are individuals.

## **Collecting Personal Information**

In terms of how we collect your personal information, we collect information only by lawful and fair means and not in an unreasonably intrusive way. We seek whenever we can to collect your personal information directly from you, through online forms, over a period of time.

## **Reasons for Collecting Personal Information**

In terms of why we use your personal information, we use your personal information to provide you Reports, for you to seek independent legal and professional advice. In terms of direct marketing activities this can include providing you with information about our services or about new developments from time to time. If you inform us that you no longer wish to receive information about our services or about new developments, we will not send any further material. Our specific purposes for collecting your personal information include, but are not limited to: Establishing and managing client relationships; providing reports; Developing and managing our knowledge-management precedent systems and databases; Detecting error, negligence, breach of contract, fraud, theft and other illegal activity and protecting the Famiquity from the same; Any purpose required to comply with any legal or regulatory requirements or provisions; and sharing your reports with third parties you agree to release the reports, and for any other purpose for which your consent has been obtained.

## **Consent**

By way of submitting answers to questions on our digital products (websites, mobile etc), and/or by clicking that you agree to our Terms, you have consented for Famiquity to collect, use or disclose your personal information. In some cases, your consent will be implied through your conduct.

We will re-obtain your consent where we intend to use your personal information for a purpose, which varies from the purpose for which the personal information was initially obtained.

## **Disclosure of Personal Information Under Certain Circumstances**

The Famiquity will disclose your personal information under certain circumstances. These circumstances include by are not limited to the following: When required or authorized by law to do so; When your consent for the disclosure has been obtained; When disclosure is required for the delivery of products or services wherein you consent is implied; Where it is necessary to establish or collect fees; If we introduce you to a third party, bound by this Privacy Policy, to provide administrative services to us; If the information is already publicly known.

The Famiquity does not disclose your personal information to any third party to assist the third party in marketing their products or services.

## **Protection of Personal Information**

The Famiquity takes reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access and disclosure, and modification. Reasonable precautions taken include: Premises security; Restricted file access to personal information;

Technological safeguards to prevent hacking, viruses and unauthorized computer access; and Implementing and employing internal password and security policies.

You may ask for access to any personal information we hold about you after our fees are paid in full. More detailed requests that require archive or other retrieval costs may be subject to our standard professional and disbursement fees. Contact information is provided below.

Since Famiquity uses your information to provide you with Reports, it is important that this information be accurate and up-to-date.

Your right to access your personal information is not absolute. Famiquity may deny you access to your personal information in certain circumstances, including: When you have not paid our fees in full; When denial of access is required or authorized by law; When the information is prohibitively costly to provide; When the personal information requested relates to existing or anticipated legal proceedings against you; When granting you access would have an unreasonable impact on another person's or other people's privacy; For legal, security or commercial proprietary reasons and to protect the Famiquity rights and property; Where the request for access is frivolous or vexatious.

If Famiquity denies your request for access to your personal information, or denies your request to correct your personal information, the Famiquity shall provide reasons.

The Famiquity does not use Social Insurance Numbers, account numbers, addresses, as a way of identifying or organizing the personal information we hold.

Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name, for example, by accessing general information on our web-site.

All complaints will be investigated by our Privacy Officer or by any other individual or individuals to whom the Privacy Officer has delegated this responsibility. We will respond to your request or inquiry within a reasonable time and at minimal or no cost to you. Appropriate measures will be taken where the complaint is justified, including amendments to this Privacy Policy.

The Famiquity regularly reviews all of its policies and procedures and reserves the right to change this Privacy Policy at any time, without notice to you.

### **Internship and Employment or Independent Contractor Position**

If you apply to Famiquity for a job or internship, your personal information is required as part of our review process. We normally retain information, including personal information, from our candidates after a decision has been made for one (1) year, unless you ask us not

to retain the information. If we offer you a job or internship, which you accept, your information, including your personal information, will be retained in accordance with our privacy procedures for employee or internship records. Information, including personal information, regarding our employees is securely retained on site and securely on cloud servers.

## **Links and Privacy**

Our digital products (Web-sites, mobile sites) may contain links to other sites which are not governed by this Privacy Policy. Our website monitors traffic patterns, site usage, and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

## **Scope of Privacy Policy**

Please be advised that this Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore, where the word 'including' is used, it shall mean 'including without limitation'.

## **Applicable Privacy Laws**

This Privacy Policy is governed by the laws of the Province of Ontario and the Federal laws of Canada applicable therein. This Privacy Policy does not create or confer upon any individual any rights or impose upon the Famiquity any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's Federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to and comply with such privacy laws.