

NORTHSTAR WEALTH ADVISORY

Comprehensive Firm Policy Manual

Client Intake, Lead Qualification, Suitability Assessment,
Compliance Standards & Communication Guidelines

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Approved by: Chief Compliance Officer & Managing Partner

1. Firm Overview & Mission

1.1 About NorthStar Wealth Advisory

NorthStar Wealth Advisory is a registered investment advisory firm headquartered in Toronto, Ontario, specializing in comprehensive financial planning and wealth management for Canadian individuals and families. Founded on the principle that every client deserves personalized, fiduciary-level guidance, NorthStar serves clients across Ontario, British Columbia, Alberta, and Quebec.

Our advisory team comprises four licensed professionals with combined expertise spanning tax planning, retirement strategy, estate planning, wealth management, education funding, and debt optimization. Each advisor maintains active registrations with the Canadian Investment Regulatory Organization (CIRO, formerly MFDA/IIROC) and adheres to all provincial securities regulations.

1.2 Investment Philosophy

NorthStar follows a goals-based investment philosophy grounded in Modern Portfolio Theory, adapted for Canadian tax structures. Our approach emphasizes long-term wealth accumulation through diversified, low-cost investment vehicles while managing risk through strategic asset allocation aligned with each client's unique circumstances, time horizon, and risk tolerance.

Core principles that guide our investment recommendations include: evidence-based decision-making over market timing, tax-efficient account structuring (RRSP, TFSA, RESP, non-registered), fee transparency and minimization, behavioral coaching to prevent emotional decision-making, and regular rebalancing discipline.

1.3 Fiduciary Standard

All NorthStar advisors operate under a fiduciary standard, meaning they are legally obligated to act in the client's best interest at all times. This duty supersedes any business consideration, commission structure, or firm revenue objective. When assessing leads and recommending service tiers, the fiduciary standard requires that we only accept clients we can genuinely serve well and recommend services proportional to their actual needs.

2. Service Tiers & Client Eligibility

2.1 Tier Definitions

Tier 1: Financial Planning

Designed for clients with investable assets between \$100,000 and \$250,000. This tier focuses on foundational financial planning including retirement projections, basic tax optimization, RRSP/TFSA contribution strategy, and goal-setting frameworks. Typical engagement duration is 6-12 months with quarterly review meetings. Annual advisory fee: 1.25% of assets under management.

Ideal client profile: Early-to-mid career professionals, first-time investors transitioning from DIY platforms, individuals who have recently received an inheritance or insurance payout and need structured guidance. Common financial goals: retirement planning, education funding for children, first investment property planning, emergency fund optimization.

Tier 2: Wealth Management

For clients with investable assets between \$250,000 and \$500,000. This tier includes comprehensive wealth management with advanced tax planning, insurance needs analysis, estate planning coordination, and multi-account optimization across registered and non-registered accounts. Clients receive monthly portfolio reviews and semi-annual in-depth strategy sessions. Annual advisory fee: 1.00% of assets under management.

Ideal client profile: Mid-career professionals and business owners with growing complexity in their financial picture, dual-income households approaching peak earning years, individuals contemplating early retirement or career transitions. Common goals: tax minimization across multiple income sources, inter-generational wealth transfer planning, business succession integration, charitable giving strategy.

Tier 3: Executive Wealth

For clients with investable assets exceeding \$500,000. This tier delivers white-glove executive wealth management including dedicated advisor access, sophisticated estate planning, cross-border tax coordination (for clients with US exposure), executive compensation optimization (stock options, RSUs, deferred compensation), and philanthropic planning. Clients receive weekly portfolio monitoring and on-demand strategy consultations. Annual advisory fee: 0.80% of assets under management.

Ideal client profile: C-suite executives, successful entrepreneurs, high-net-worth individuals approaching or in retirement with complex asset structures, professionals with significant equity compensation. Common goals: estate freeze strategies, family trust establishment, multi-generational wealth preservation, tax-efficient charitable foundations, cross-border compliance.

2.2 Minimum Asset Threshold

The firm's minimum investable asset threshold is \$100,000 CAD. This threshold exists not as a barrier to access but as a practical determination of where our fee structure provides genuine value. Below this level, the advisory fees would represent a disproportionate percentage of the client's assets, and lower-cost alternatives (robo-advisors, DIY platforms like Wealthsimple Invest, or group financial education programs) would likely serve the client better.

When disqualifying a lead below the asset threshold, communication should be respectful, acknowledge their financial journey positively, and include specific referrals to appropriate alternatives. The rejection should never imply the person's financial situation is inadequate; rather, it should frame the mismatch as our services being designed for a different scale of complexity.

2.3 Service Tier Assignment Criteria

Service tier assignment during lead enrichment must consider all of the following factors, not just investable assets. A client with \$200,000 in assets but complex cross-border tax obligations may warrant Tier 2 service. Conversely, a client with \$400,000 in a straightforward RRSP rollover may be well-served by Tier 1 initially.

Factor	Tier 1 Indicator	Tier 2 Indicator	Tier 3 Indicator
Investable Assets	\$100K-\$250K	\$250K-\$500K	\$500K+
Income Complexity	Single source (employment)	Multiple sources, small business	Executive comp, equity, trusts
Tax Situation	Standard T4 employment	Self-employment, rental income, capital gains	Cross-border, corporate holdings, estate freeze
Family Structure	Single or couple, young children	Dual income, aging parents, education needs	Multi-generational, family trusts, foundations
Time Horizon	20+ years to retirement	10-20 years, multiple horizons	Near/in retirement, legacy planning
Goal Complexity	1-2 primary goals	3-4 competing goals	5+ interconnected goals, philanthropic
Current Advisory	Never had/DIY	Previously had, switching	Currently has, seeking upgrade
Risk Tolerance	Conservative to moderate	Moderate	Moderate to aggressive, sophisticated

3. Geographic Coverage & Regulatory Requirements

3.1 Served Provinces

NorthStar is currently registered to provide advisory services in four Canadian provinces: Ontario (ON), British Columbia (BC), Alberta (AB), and Quebec (QC). Registration in each province carries specific regulatory obligations, and we may only accept clients who are residents of these jurisdictions.

Leads from provinces where we are not registered (Manitoba, Saskatchewan, Nova Scotia, New Brunswick, Newfoundland and Labrador, Prince Edward Island, Northwest Territories, Yukon, Nunavut) must be automatically disqualified. This is a hard regulatory requirement, not a business preference. Accepting a client from an unregistered jurisdiction could result in regulatory sanctions, fines, and potential loss of registration in all provinces.

3.2 Quebec-Specific Requirements

Clients resident in Quebec require additional considerations due to the province's unique regulatory framework under the Autorite des marches financiers (AMF). All client communications for Quebec residents must be available in French upon request. The initial outreach email should acknowledge this right. Quebec's civil law system affects estate planning recommendations differently from common law provinces; advisors matched to Quebec clients must have specific Quebec estate planning expertise.

When enriching leads from Quebec, risk flags should include a note about language preference requirements and any estate planning implications of civil law versus common law structures.

3.3 Cross-Border Considerations

During lead enrichment, the system should flag any indicators of cross-border tax obligations, which include but are not limited to: US citizenship or green card status mentioned in free text, references to US property ownership, mention of US-based employment income or retirement accounts (401k, IRA), and any reference to cross-border business operations. These leads require Tier 2 or Tier 3 service regardless of asset level, as cross-border tax compliance adds significant complexity.

4. Lead Qualification & Scoring Framework

4.1 Automatic Disqualification Rules

The following conditions result in immediate, automatic disqualification. These are deterministic rules applied before any AI enrichment occurs. No AI judgment should be used for these decisions.

1. Province not in served list (ON, BC, AB, QC): Regulatory prohibition.
2. Investable assets below \$100,000 CAD: Fee structure mismatch.

3. No overlap between stated financial goals and firm's offered goal types (retirement_planning, tax_optimization, estate_planning, education_funding, wealth_management, debt_management): Service mismatch.

These rules must never be overridden by AI. They are implemented as deterministic if/switch logic in the intake workflow, prior to any AI processing. A human administrator may override a disqualification through the dashboard, which triggers re-enrichment.

4.2 Priority Scoring Model

After a lead passes disqualification filters, the AI enrichment agent assigns a priority score (HIGH, MEDIUM, LOW) based on a weighted assessment of the following factors:

HIGH Priority Indicators

- Investable assets in Tier 2 or Tier 3 range (\$250K+)
- Currently switching from another advisor (indicates active buying intent)
- Multiple complex financial goals (3+ goals indicates high engagement potential)
- Aggressive or moderate risk tolerance with long time horizon (high growth potential)
- Free text indicates urgency (recent life event, inheritance, retirement within 2 years, business sale)
- Province is Ontario (proximity to headquarters enables in-person meetings)
- Annual income above \$200,000 (indicates capacity for ongoing advisory fees)

MEDIUM Priority Indicators

- Investable assets in Tier 1 range (\$100K-\$250K) with growth indicators
- Previously had an advisor (understands the value, but needs to be re-engaged)
- 1-2 financial goals with moderate complexity
- Moderate risk tolerance with 5-10 year horizon
- Standard financial planning needs without unusual complexity

LOW Priority Indicators

- Assets near the minimum threshold (\$100K-\$130K)
- Never had an advisor and conservative risk tolerance (may need more education before engaging)
- Single, simple financial goal (e.g., basic RRSP optimization only)
- Very long time horizon (20+ years) with low current complexity (may be better served by low-cost robo-advisory initially)
- Free text is minimal or generic (lower engagement signal)

4.3 Risk Flag Identification

During AI enrichment, the system must identify and flag any risk indicators that require advisor attention. Risk flags do not disqualify a lead; they inform the advisor's review. Categories of risk flags include:

Regulatory Risk Flags

- Potential cross-border tax obligations (US/international mentions)
- Quebec civil law estate planning complexity
- References to cryptocurrency or unregulated investments (requires additional KYC)
- Mention of Power of Attorney or capacity concerns for family members
- Politically Exposed Person (PEP) indicators (government roles, diplomatic positions)

Suitability Risk Flags

- Mismatch between stated risk tolerance and financial goals (e.g., aggressive tolerance with 2-year timeline)
- Unrealistic return expectations mentioned in free text
- Signs of financial distress combined with aggressive goals (may indicate desperation rather than informed risk-taking)
- Very high concentration in a single asset or sector
- Request for specific investment products rather than planning (may indicate product shopping rather than advisory need)

Behavioral Risk Flags

- Language suggesting past negative advisory experience (trust rebuilding needed)
- Extremely detailed free text with strong opinions about markets (may resist advisor guidance)
- References to day trading, options, or highly speculative strategies alongside conservative stated tolerance
- Mention of family pressure or conflict around financial decisions
- Indicators of potential vulnerability (recent bereavement, divorce, job loss mentioned alongside large asset figures)

4.4 Advisor Match Ranking

The AI enrichment system ranks all four advisors for each lead, producing an ordered list with match reasoning. The ranking algorithm must consider the following factors in order of importance:

1. **Specialization alignment:** The advisor's listed specializations must overlap with the lead's stated financial goals. An advisor specializing in tax_planning and estate_planning should rank higher for leads seeking those services than one specializing in debt_management.
2. **Capacity:** Advisors near their caseload maximum should be deprioritized. An advisor at 22/25 capacity represents a higher risk of inadequate service than one at 8/20. However, do not completely eliminate a near-capacity advisor if they are the only specialization match; instead, flag the capacity concern.
3. **Service tier experience:** Match the lead's likely tier with the advisor's typical client profile. Michael Torres (tax/wealth/estate) and David Kim (estate/wealth/retirement) handle more Tier 2-3 clients. Priya Sharma and Rachel Nguyen handle more Tier 1-2 clients.
4. **Geographic/cultural factors:** For Quebec leads, advisors with French language capability should rank higher. For leads indicating cultural or language preferences in free text, weight accordingly.

Current Advisor Roster

Advisor	Specializations	Current Caseload	Typical Tier
Michael Torres	Tax Planning, Wealth Mgmt, Estate Planning	18/25	Tier 2-3
Priya Sharma	Retirement Planning, Education Funding, Tax Planning	14/20	Tier 1-2
David Kim	Estate Planning, Wealth Mgmt, Retirement Planning	22/25	Tier 2-3
Rachel Nguyen	Debt Management, Retirement Planning, Education Funding	8/20	Tier 1

When generating advisor match rankings, the output must include a brief rationale for each advisor's ranking position. This rationale is displayed to the human reviewer on the dashboard and informs their override decision. Example: 'Ranked #1: Priya Sharma — retirement planning specialization aligns with primary goal, moderate caseload (14/20) allows adequate attention, Tier 1 experience matches asset level.'

5. Client Profiling & Enrichment Standards

5.1 Profile Summary Requirements

The AI-generated profile summary is the single most important enrichment artifact. It serves as the advisor's first impression of the prospective client and must accomplish several objectives in 3-5 sentences: communicate the client's financial situation clearly, highlight the most relevant planning opportunities, identify the primary emotional or motivational driver behind their inquiry, and flag anything unusual that warrants attention.

Profile summaries must be written in professional, third-person language. They should avoid jargon that the admin reviewer might not understand and should never include speculative financial advice. The summary describes the lead's situation and opportunities; it does not recommend specific actions.

5.2 Profile Summary Examples

Example 1 (Tier 1, MEDIUM priority): Sarah Chen is a 34-year-old marketing professional in Toronto with approximately \$150,000 in investable assets across a TFSA and employer RRSP. Her primary goals are retirement planning and education funding for her two children (ages 3 and 5), with a 20+ year horizon and moderate risk tolerance. She has never worked with a financial advisor and appears motivated by a desire to move beyond her current DIY approach on Wealthsimple Invest. The combination of dual savings goals and multi-decade horizon presents a strong foundation for comprehensive financial planning at the Tier 1 level.

Example 2 (Tier 3, HIGH priority): Robert Blackwell is a VP of Engineering at a publicly-traded technology company in Vancouver, reporting approximately \$750,000 in investable assets plus significant unvested RSUs. He is switching from his current advisor due to dissatisfaction with tax optimization, particularly around equity compensation. His financial goals span wealth management, tax planning, and estate planning, with a moderate-to-aggressive risk tolerance. The RSU complexity, cross-border potential (tech sector), and high asset level warrant Tier 3 Executive Wealth service. Note: his free text mentions upcoming IPO at a subsidiary, suggesting the asset figure may increase substantially.

Example 3 (Tier 1 with flags, MEDIUM priority): Diane Tremblay is a recently divorced teacher in Montreal with \$120,000 from a pension division settlement. She is seeking retirement planning guidance and has never had an advisor. While the asset level suggests Tier 1 service, several factors require attention: Quebec residency means civil law estate implications, recent divorce indicates potential emotional vulnerability around financial decisions, and the pension source means these assets represent her primary retirement vehicle. Language preference may be French. Recommend pairing with an advisor experienced in sensitive life transitions.

5.3 Conversation Starters

The enrichment system generates 3-5 conversation starters designed to help the advisor build rapport in the initial consultation. Effective conversation starters are specific to the lead's

situation (not generic), demonstrate that the advisor has reviewed their information, open dialogue rather than closing it (questions, not statements), and avoid premature advice or product suggestions.

Good conversation starters reference the lead's specific goals, timeline, or life situation. They should feel like a knowledgeable colleague asking an insightful question, not a salesperson reading a script.

Conversation Starter Examples

- 'You mentioned education funding as a priority alongside retirement. With your children at ages 3 and 5, we have a really interesting window for RESP optimization. Have you started contributing to RESPs yet, or is that something you'd like to explore together?'
- 'I noticed you're currently managing your investments through a DIY platform. What prompted you to start looking for professional guidance at this point? Understanding that trigger helps me make sure we're addressing the right priorities.'
- 'Your RSU situation sounds complex, especially with the timeline you mentioned. Could you walk me through how your equity compensation is currently structured? That will help us identify the biggest tax optimization opportunities.'
- 'You mentioned you previously had a financial advisor but are now looking for a new one. What worked well in that relationship, and what would you want to see done differently? I want to make sure we start off on the right foot.'

5.4 Prohibited Profile Content

AI-generated profiles must never include:

- Specific investment recommendations (e.g., 'should invest in index funds')
- Projected returns or specific numerical forecasts
- Diagnoses of financial problems (e.g., 'is in financial trouble')
- Assumptions about income, wealth, or lifestyle beyond what is stated
- Judgmental language about financial decisions or situation
- References to race, ethnicity, religion, gender identity, or sexual orientation
- Medical, health, or disability assumptions
- Political affiliations or opinions
- Guarantees or promises about outcomes
- Comparison to other clients or prospects

6. Know Your Client (KYC) & Suitability Requirements

6.1 KYC Obligations

Under CRO regulations, all registered advisors must complete a thorough KYC process before making any investment recommendations. While the intake form and AI enrichment are not a substitute for formal KYC, they represent the first stage of information gathering. The enrichment process should identify KYC-relevant information early to streamline the formal process during the first consultation.

KYC factors that the enrichment system should extract and highlight from available intake data include: investment knowledge and experience level (inferred from current advisor situation and free text), time horizon for each stated goal, risk tolerance (stated), apparent risk capacity (inferred from asset level relative to goals), sources of investable assets if mentioned (employment savings, inheritance, business sale, pension), and any existing investment holdings mentioned.

6.2 Suitability Assessment Framework

The suitability assessment determines whether our services are appropriate for the lead's situation. During AI enrichment, the system performs a preliminary suitability assessment that the human reviewer validates. Key suitability considerations include:

Risk Tolerance vs. Risk Capacity Alignment

A lead may state 'aggressive' risk tolerance but have a 2-year investment timeline and limited assets. The AI should flag this misalignment. Conversely, a lead may state 'conservative' tolerance but have a 30-year horizon and high income; this may indicate an education opportunity rather than a true conservative mandate.

Stated Tolerance	Short Horizon (0-3y)	Medium (3-10y)	Long (10+ y)
Conservative	Aligned	Review: may be too cautious	Review: growth opportunity missed
Moderate	Flag: timeline too short	Aligned	Aligned
Aggressive	Flag: high risk of loss	Review: volatility tolerance needed	Aligned

6.3 Vulnerable Client Indicators

The enrichment system must identify potential client vulnerability indicators to ensure advisors approach initial consultations with appropriate sensitivity. Vulnerability does not disqualify a lead; it informs how the advisor engages. Indicators include:

- Recent major life event mentioned in free text (death of spouse, divorce, job loss, serious illness)
- Very elderly client (inferred from retirement timeline or mentions of age) without mention of Power of Attorney or estate planning
- Large sudden influx of assets (inheritance, insurance payout, business sale) with no prior investment experience

- Language suggesting confusion, overwhelm, or desperation about financial situation
- Mention of family pressure to invest or change financial arrangements

When vulnerability indicators are present, the profile summary should note them discretely and the conversation starters should be adapted to be more supportive and less transactional in tone.

7. Client Communication Standards

7.1 Email Communication Principles

All outbound email communications, whether AI-generated or human-composed, must adhere to the following principles. These apply to scheduling outreach, confirmation emails, follow-up sequences, rejection/nurture emails, and pre-meeting nurture emails.

Tone & Voice

- Professional but warm; authoritative but approachable
- First-person plural ('we' / 'our team') for firm references, first-person singular ('I') when the specific advisor is writing
- Active voice preferred; avoid passive constructions that obscure who is doing what
- Concise paragraphs; no paragraph longer than 4 sentences in an email
- No exclamation marks in the first email; use sparingly thereafter
- Never use 'Dear [Name]' as a salutation; use 'Hi [FirstName]' for initial outreach and 'Hello [FirstName]' for formal communications

Mandatory Compliance Elements

- Firm name must appear in email signature: 'NorthStar Wealth Advisory'
- Advisor's full name, title, and registration number in signature
- Firm phone number and physical address in footer
- Unsubscribe language for marketing/nurture emails: 'If you no longer wish to receive these communications, please reply with UNSUBSCRIBE'
- No performance promises, return projections, or guarantees
- No urgent or pressure language ('limited time', 'act now', 'don't miss out')
- No disparaging references to other advisors, firms, or financial products
- No use of superlatives about firm capabilities ('best', 'guaranteed', 'top-rated', '#1')

7.2 Prohibited Language in AI-Generated Communications

The following words and phrases must never appear in AI-generated client communications. The guardrails system checks for these before any email is sent:

Financial Promise Language

- 'guaranteed returns', 'risk-free', 'no-loss', 'safe investment', 'certain profit'
- 'beat the market', 'outperform', 'alpha generation', 'market-beating'
- Any specific percentage return mentioned as expected or typical
- 'double your money', 'get rich', 'financial freedom' (when implying guaranteed outcome)
- 'once-in-a-lifetime', 'can't lose', 'sure thing', 'no-brainer investment'

Pressure & Urgency Language

- 'limited time offer', 'act now', 'don't wait', 'before it's too late'
- 'spots are filling up', 'only X slots remaining', 'exclusive opportunity'
- 'you can't afford not to', 'every day you wait costs you', 'time is money'

- Any artificial deadline not tied to a real scheduling constraint

Regulatory Violation Language

- Comparative claims vs. other firms without documented evidence
- Testimonial-like language ('our clients love us', 'everyone who works with us...')
- Claims of unique capability ('only firm that...', 'no one else offers...')
- Tax advice in email (should only be discussed in formal consultation)
- Any suggestion that the lead's current advisor is doing something wrong

7.3 Email Template Standards

All AI-generated emails should follow these structural guidelines:

- Subject line: Clear, specific, no caps lock, under 60 characters, mentions their name or goal
- Opening: Acknowledge who they are and why you're reaching out (reference their intake)
- Body: 2-3 short paragraphs covering the purpose, what happens next, and what they need to do
- Closing: Clear call-to-action (exactly one), warm sign-off
- Signature: Advisor name, title, firm, contact info, compliance footer

7.4 Follow-Up Cadence Rules

The automated follow-up system operates on a strict cadence for leads in OUTREACH_IN_PROGRESS status who have not responded:

- Follow-up 1: 48 hours after initial outreach. Gentle reminder, reference original email, offer alternative scheduling.
- Follow-up 2: 96 hours after initial outreach. Brief, acknowledge they may be busy, provide direct link or phone number as alternative contact.
- Final notice: 168 hours (7 days) after initial outreach. Professional close, leave door open for future contact, mark lead as UNRESPONSIVE.

Maximum email frequency: No more than 10 emails per hour per lead across all workflows. This rate limit applies to all outbound email (outreach, follow-up, nurture, confirmation). Emails that would exceed this limit are queued and sent in the next available window.

After marking a lead as UNRESPONSIVE, no further automated emails are sent. The lead remains in the system and can be manually re-engaged by an advisor through the dashboard.

8. Consultation Scheduling & Booking Policies

8.1 Business Hours

NorthStar operates Monday through Friday, 9:00 AM to 5:00 PM Eastern Time (America/Toronto). All consultation appointments must fall within these hours. The system should not offer, confirm, or book appointments outside this window.

Appointments require a minimum 30-minute buffer between the end of one consultation and the start of another. Standard initial consultation duration is 60 minutes. Advisors may have additional blocked time for preparation, lunch, or internal meetings that reduces their available slots.

8.2 Preferred Time Handling

During intake, leads provide a preferred consultation date/time and an optional backup date/time. The availability pre-check system (WF3) verifies these against the matched advisor's calendar. Three outcomes are possible:

5. **PREFERRED_AVAILABLE:** The lead's first choice is open with their top-matched advisor. Outreach email confirms this time directly.
6. **BACKUP_AVAILABLE:** Preferred time is taken but backup time is available. Outreach email presents the backup time as a recommendation.
7. **SCHEDULING_REQUIRED:** Neither time is available. Outreach email presents 3 alternative time slots within the same week, selected by the system based on advisor calendar availability.

When presenting alternative slots, the system should offer times that are spread across different days and both morning/afternoon when possible, to maximize the chance of finding a convenient option.

8.3 Booking Confirmation Requirements

Every booked consultation must generate: a Google Calendar event on the advisor's calendar with lead details in the event description, a confirmation email to the lead with date/time/advisor name/what to prepare, an Airtable record update with booking details (datetime, advisor, calendar event ID), and a Redis state update changing status to BOOKED.

Cancellations must be processed immediately: remove the Google Calendar event, send acknowledgment email, update Airtable status to CANCELLED_BY_LEAD, and log the cancellation reason if provided.

9. Data Privacy & Information Security

9.1 Personal Information Handling

All lead data is considered Personally Identifiable Information (PII) and must be handled in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation (including Quebec's Law 25).

AI-generated content (profile summaries, enrichment data, email drafts) must not be used for any purpose other than the lead's intake and advisory process. This data must not be shared with third parties, used for marketing analytics beyond the individual lead's journey, or retained beyond the applicable retention period.

9.2 Data Retention

- Active leads (SUBMITTED through BOOKED): Full data retained in Airtable and Redis
- Completed clients (COMPLETED): Data migrated to long-term CRM, Redis cache cleared after 30 days
- Rejected/Disqualified leads: Retained for 90 days for audit purposes, then anonymized
- Unresponsive leads: Retained for 180 days, then archived with anonymized enrichment data

9.3 Consent Requirements

The intake form must obtain explicit consent for: collection and processing of financial information for advisory assessment purposes, AI-assisted analysis of their information (transparency about AI use), email communication regarding their inquiry and follow-up scheduling, and data retention as described above.

The consent checkbox on the intake form must use clear, plain language. Pre-checked boxes are not permitted under PIPEDA. The consent text should be: 'I consent to NorthStar Wealth Advisory collecting and processing the information provided above for the purpose of assessing my financial advisory needs. I understand that AI-assisted tools may be used to analyze my information and that I will be contacted via email regarding my inquiry. I can withdraw consent at any time by contacting privacy@northstarwealth.ca.'

9.4 AI Transparency

NorthStar is committed to transparency about AI use in our client intake process. While we do not need to disclose every technical detail, clients should understand that: initial assessment of their intake form involves automated analysis, the advisor they meet has reviewed AI-generated summaries of their information (not just raw form data), the final decision to accept them as a client is always made by a human advisor, and any AI-generated communications (scheduling emails, follow-ups) are sent on behalf of a named advisor who has reviewed and approved the communication.

Advisors should be prepared to answer questions about AI use in the intake process honestly. The recommended response framework: 'We use AI tools to help us understand your financial picture more quickly and match you with the right advisor. Think of it like an advanced assistant

that helps me prepare for our conversation. All important decisions about your advisory relationship are made by me personally.'

10. Rejection Handling & Nurture Strategy

10.1 Rejection Reasons & Communication

When a human reviewer rejects a lead, they must provide a reason. The AI rejection email generator uses this reason to craft an appropriate, personalized response. Rejection should never feel like dismissal; it should feel like responsible guidance toward better-fit alternatives.

Rejection Reason	Email Tone	Include
capacity_full	Apologetic, hopeful	Waitlist offer, timeline estimate, referral to partner firm
not_a_fit	Respectful, helpful	Specific reason why, alternative resources, invitation to reapply if situation changes
insufficient_info	Encouraging, specific	What additional info is needed, how to resubmit, why we need it
goals_outside_scope	Honest, directional	What we do offer, referral to appropriate specialist, educational resources
timing_not_right	Understanding, warm	Acknowledgment of their situation, invitation to reconnect, timeline suggestion

10.2 Rejection Email Requirements

- Must acknowledge the lead by name and reference their specific situation
- Must not use form-letter language or feel automated
- Must include at least one specific, actionable alternative (a referral, resource, or next step)
- Must leave the door open for future engagement without creating false expectations
- Must not include any language that could be interpreted as financial advice
- Must not reveal internal scoring, priority ranking, or AI assessment details
- Tone calibration: err on the side of warmth and helpfulness

10.3 Pre-Meeting Nurture Emails

For leads with booked consultations, the system generates a pre-meeting nurture email sent 24-48 hours before the appointment. This email serves multiple purposes: reinforce their decision to book, set expectations for the consultation, provide any preparation instructions, and build anticipatory rapport.

The nurture email should reference specifics from their intake (their stated goals, the advisor they'll be meeting) and provide practical value (what documents to have ready, what questions to think about). It should not be a sales pitch; the client has already committed to the meeting. The nurture email requires advisor approval before sending.

10.4 Nurture Email Prohibited Content

- No fee discussion (fees are discussed in the consultation, not in advance emails)
- No specific investment recommendations or market commentary
- No pressure language about commitment ('we're excited to get started' implies they've already decided)
- No reference to other clients or social proof
- No excessive length; keep under 250 words excluding signature

11. Error Handling & Escalation Procedures

11.1 AI Failure Modes

When AI enrichment or generation fails, the system must never silently drop the lead. Failure handling follows this hierarchy:

8. Retry once with a 30-second delay (transient API errors)
9. If retry fails, use fallback template (pre-written generic versions of all AI outputs)
10. Send error alert to admin dashboard and admin email
11. Log error details including: workflow ID, node name, lead ID, error message, timestamp, and input data that caused the failure

Fallback templates exist for every AI-generated artifact: a generic profile summary template, a generic email template for each outreach type, and default conversation starters. These fallbacks are functional but lack personalization; they ensure the lead continues through the pipeline while flagging for human attention.

11.2 State Machine Violations

If a workflow attempts an invalid state transition (e.g., SUBMITTED directly to BOOKED, or REJECTED to OUTREACH_IN_PROGRESS), the transition must be blocked, the error must be logged, and an admin alert must be sent. Valid state transitions are enforced at the code level, not by AI. The valid transition map is defined in the system specification and must not be modified without compliance review.

11.3 Escalation Matrix

Situation	Auto-Response	Escalation Target	SLA
AI enrichment failure (single lead)	Retry + fallback template	Admin email alert	Immediate
AI enrichment failure (>3 leads/hour)	Pause enrichment pipeline	Admin + engineering	15 minutes
Email delivery failure	Retry once, then queue	Admin dashboard flag	1 hour
Calendar booking conflict	Prevent double-book, alert	Advisor direct notification	Immediate
Data integrity error (missing lead)	Block all processing	Admin + engineering	Immediate
Rate limit exceeded	Queue and delay	Admin dashboard warning	Auto-resolves

12. Glossary of Terms

AUM (Assets Under Management): The total market value of investments that an advisor or firm manages on behalf of clients.

CIRO (Canadian Investment Regulatory Organization): The national self-regulatory organization overseeing investment dealers and mutual fund dealers in Canada, formed from the merger of MFDA and IIROC.

Fiduciary Standard: A legal obligation to act in the client's best interest, with loyalty and care, above the advisor's or firm's own interests.

KYC (Know Your Client): Regulatory requirement to gather detailed information about a client's financial situation, investment knowledge, risk tolerance, and objectives before making recommendations.

Lead: A prospective client who has submitted an intake form but has not yet been accepted as a client.

PIPEDA: The Personal Information Protection and Electronic Documents Act, Canada's federal private sector privacy law.

PEP (Politically Exposed Person): An individual who holds or has held a prominent public function, requiring enhanced due diligence under anti-money laundering regulations.

RESP (Registered Education Savings Plan): A tax-advantaged savings account designed to help save for a child's post-secondary education, eligible for Canada Education Savings Grant matching.

RRSP (Registered Retirement Savings Plan): A tax-deferred retirement savings account where contributions are tax-deductible and growth is tax-sheltered until withdrawal.

RSU (Restricted Stock Unit): A form of equity compensation where shares are granted to an employee on a vesting schedule.

Suitability: The regulatory requirement that any investment recommendation must be appropriate for the client's specific circumstances, including risk tolerance, time horizon, and financial objectives.

TFSA (Tax-Free Savings Account): A registered account where investment income and capital gains are completely tax-free, with annual contribution room.

Tier: NorthStar's service level classification (Tier 1: Financial Planning, Tier 2: Wealth Management, Tier 3: Executive Wealth) determined by client complexity and asset level.

End of Document — NorthStar Wealth Advisory Comprehensive Policy Manual v2.1

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