



MSA FINANCIAL PRIVACY POLICY

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MSA FINANCIAL IS A FIRM OF FINANCIAL SECURITY ADVISORS AND A FINANCIAL PLANNING FIRM IN CANADA, LICENSED AND REGISTERED AS A FIRM IN BROKERAGE OF FINANCIAL SERVICES IN QUEBEC, ONTARIO, ALBERTA, MANITOBA, AND BRITISH COLUMBIA. MSA FINANCIAL IS A MANAGING GENERAL AGENCY FOR VARIOUS LIFE INSURANCE COMPANIES AND BANKS. AS A MANAGING GENERAL AGENCY, MSA FINANCIAL CONTRACTS INDEPENDENT FINANCIAL SECURITY ADVISORS FOR THE LIFE INSURANCE COMPANIES AND BANKS THAT IT REPRESENTS, THIS CONTRACT ALLOWS THE ADVISOR TO SELL PRODUCTS DIRECTLY TO INSURANCE AND SEGREGATED FUND CLIENTS/CUSTOMERS THROUGH MSA FINANCIAL. THE RESULTING SALES/APPLICATIONS ARE PROCESSED IN THE STRICTEST OF PRIVACY AT OUR HEAD OFFICE PRIOR TO BEING SENT TO THE LIFE INSURANCE COMPANY AND/OR BANK.

MSA FINANCIAL CONFORMS TO ALL PRIVACY ACTS SUCH AS PIPEDA AS ESTABLISHED BY CANADA AND EACH PROVINCE WHERE MSA FINANCIAL IS LICENSED.

MSA FINANCIAL COMPLIES WITH THE CANADIAN ANTI-SPAM LAW (CASL) THEREFORE IN THE FUTURE IF YOU SHOULD CHOOSE, YOU CAN UNSUBSCRIBE FROM ANY ELECTRONIC COMMUNICATIONS FROM MSA FINANCIAL.

CONSENT OF CEM'S (COMMERCIAL ELECTRONIC MESSAGES): MSA FINANCIAL ONLY SENDS MESSAGES SUCH AS EMAILS TO INDIVIDUALS WHO HAVE PROVIDED EXPLICIT CONSENT TO RECEIVE SUCH MESSAGES.

HOW WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION

AS A MANAGING GENERAL AGENCY, WE ARE COMMITTED TO FOLLOW ALL THE NECESSARY STEPS IN INSURING THAT OUR ADVISORS CLIENT'S PERSONAL INFORMATION AND THAT OF OUR OWN CLIENTS IS TREATED WITH FULL CONFIDENTIALITY AND PRIVACY. MSA FINANCIAL COMPLIES WITH THE TEN FAIR INFORMATION PRINCIPLES OF THE PIPEDA ACT (PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT): ACCOUNTABILITY, IDENTIFYING PURPOSES, CONSENT, LIMITING COLLECTION, LIMITING USE, DISCLOSURE AND RETENTION, ACCURACY, SAFEGUARDS, OPENESS, INDIVIDUAL ACCESS, CHALLENGING COMPLIANCE. THE INFORMATION IS ONLY USED FOR THE PURPOSE OF CONDUCTING BUSINESS WITH THE INSURERS AND/OR BANK, AS AUTHORIZED BY YOU AND REQUIRED BY LAW. WHEN WE RECEIVE YOUR APPLICATION, YOU SHARE YOUR PERSONAL INFORMATION WITH US. WE ASSUME YOU CONSENT FOR OUR FIRM TO USE OR SHARE THIS INFORMATION IN AN APPROPRIATE MANNER.

WE MAY USE AND DISCLOSE THIS INFORMATION IN ORDER TO:

- PROCESS AND SUBMIT IT TO THE LIFE INSURANCE COMPANIES AND/OR BANK
- USE WHAT IS NECESSARY AND PERMISSIBLE TO COMPLETE THE UNDERWRITING PROCESSTO COMMUNICATE WITH YOUR FINANCIAL ADVISOR (OR WITH YOU DIRECTLY IF YOU ARE ONE OF OUR OWN CLIENTS) ON THE STATUS OF YOUR APPLICATION AS IT IS BEING ASSESSED BY THE LIFE INSURANCE COMPANY AND/OR BANK FOR INVESTMENT, INSURANCE OR OTHER SERVICES

- TO COMMUNICATE WITH THE INSURANCE COMPANY AND/OR BANK ON YOUR APPLICATION
- TO COMMUNICATE BETWEEN THE FINANCIAL ADVISOR AND THE INSURANCE COMPANY AND/OR BANK ON YOUR APPLICATION
- COMMUNICATE WITH AN AUTHORIZED PARTY AS IS REQUIRED BY LAW TO COMMUNICATE WITH THE INSURANCE COMPANY AND/OR BANK, YOUR FINANCIAL ADVISOR, YOU OR ANY PARTY THAT YOU AUTHORIZE US TO COMMUNICATE WITH ON YOUR FILE
- COMMUNICATE ON YOUR FILE AS REQUIRED BY LAW

WE EXPECT THE ADVISORS TO COMPLY WITH ALL RELEVANT LEGISLATION, WITH WHICH MSA FINANCIAL ALSO COMPLIES.

THE KIND OF INFORMATION THAT WE MAY COLLECT

AS MENTIONED ABOVE, MSA FINANCIAL COLLECTS THE FOLLOWING TYPE OF INFORMATION ON OUR CLIENTS AND OUR ADVISORS' CLIENTS ARE AS FOLLOWS: NAMES, ADDRESSES, PHONE NUMBER AND OTHER IDENTIFYING INFORMATION SUCH AS SOCIAL INSURANCE NUMBERS AND GOVERNMENT ISSUES IDENTIFICATION NUMBERS AND COPIES PERMITTED WITHIN THE REGULATION OR THE CLIENTS/ADVISORS BIRTH DATE. IN ADDITION, THE INFORMATION COLLECTED CAN BE FINANCIAL AS WELL, WHICH INCLUDE INFORMATION SUCH AS WORKPLACE, ANNUAL INCOME, ASSETS AND LIABILITIES.

PROTECTING YOUR PERSONAL INFORMATION

ALL THE EMPLOYEES, ASSOCIATED ADVISORS AND SUPPLIERS WHO ARE GRANTED ACCESS TO CLIENT RECORDS UNDERSTAND THE NEED TO KEEP THIS INFORMATION PROTECTED AND CONFIDENTIAL. ALL MSA FINANCIAL EMPLOYEES HAVE SIGNED A CONFIDENTIALITY AGREEMENT THEREFORE THEY KNOW THAT THE INFORMATION IS TO BE USED ONLY FOR THE PURPOSE INTENDED. WE HAVE ESTABLISHED POLICIES AND PROCEDURES TO COMPLY WITH THIS DECLARATION. OUR PRIVACY POLICIES ARE AVAILABLE ON OUR WEBSITE AT MSAFINANCIAL.COM, AT OUR PHYSICAL LOCATION/OFFICE IN MONTREAL, QUEBEC AT 3333 COTE VERTU, SUITE 450, VILLE ST. LAURENT, QUEBEC OR VIA EMAIL KIKI@MSAFINANCIAL.COM

MSA FINANCIAL HAS SAFEGUARDS TO PROTECT YOUR PERSONAL INFORMATION; HOWEVER, IN THE EVENT OF AN UNAUTHORIZED ACCESS, DISCLOSURE OR USE OF YOUR PERSONAL INFORMATION, THERE IS A POSSIBILITY THAT YOU MAY EXPERIENCE: IDENTITY THEFT, NEGATIVE EFFECTS ON A CREDIT RECORD, FINANCIAL LOSS, EMBARRASSMENT OR DAMAGE TO REPUTATION. IF MSA FINANCIAL BELIEVES THAT YOU FACE A REAL RISK OF SIGNIFICANT HARM, MSA FINANCIAL'S PRIVACY OFFICER WILL NOTIFY YOU OF THE DATA BREACH AND SUGGEST STEPS TO REDUCE YOUR RISK OF HARM.

MSA FINANCIAL COMPLIES WITH THE PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT THEREFORE ALL CLIENT INFORMATION IS PROTECTED AND IS SECURE.

ACCURACY

WE MAKE EVERY POSSIBLE EFFORT TO ENSURE THAT YOUR PERSONAL INFORMATION IS AS ACCURATE AND COMPLETE AS NECESSARY FOR THE PURPOSES IT IS COLLECTED, USED, OR DISCLOSED. IN THE EVENT THAT WE LEARN THAT YOUR PERSONAL INFORMATION IS NOT ACCURATE WE WILL RECTIFY THIS BY INFORMING THE LIFE INSURANCE COMPANY AND/OR BANK FOR WHICH YOUR APPLICATION WAS SUBMITTED AND NOTIFYING THEM OF THIS AND REQUEST THAT IT BE REVIEWED AND THE NEED TO CORRECT THE INACCURACY.

USE, DISCLOSURE AND RETENTION OF PERSONAL INFORMATION

MSA FINANCIAL, THROUGH ITS CONTRACTED ADVISORS, WILL MAKE A REASONABLE EFFORT TO MAKE SURE CUSTOMERS UNDERSTAND HOW THE MANAGING GENERAL AGENCY AND THE INSURERS WILL USE THEIR PERSONAL INFORMATION. MSA FINANCIAL WILL USE OR DISCLOSE PERSONAL INFORMATION ONLY FOR THE REASONS FOR WHICH IT WAS COLLECTED AND WILL KEEP PERSONAL INFORMATION AS NECESSARY FOR THE IDENTIFIED PURPOSES. UNDER CERTAIN EXCEPTIONAL CIRCUMSTANCES, MSA FINANCIAL MAY HAVE A LEGAL DUTY OR RIGHT TO DISCLOSE PERSONAL INFORMATION WITHOUT THE CUSTOMER'S

KNOWLEDGE OR CONSENT TO PROTECT THE INTERESTS OF INSURER OR THE PUBLIC INTEREST AND FOR CERTAIN LAW AND LEGAL REQUIREMENTS.

ACCESSIBILITY OF PERSONAL INFORMATION

IF A CUSTOMER MAKES A REQUEST IN WRITING, MSA FINANCIAL WILL PROVIDE THE PERSONAL INFORMATION IT HAS ON FILE IN A TIMELY MANNER.

OUR PRIVACY OFFICER IS:

KIKI MATARAGAS
DIRECTOR OF OPERATIONS AND COMPLIANCE OFFICER

TEL: (514) 343-0200 EXT. 237

E-MAIL: KIKI@MSAFINANCIAL.COM

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