

PRIVACY STATEMENT

GENERAL

PRO Financial Solutions (“PRO”) is committed to privacy and the protection of personal information.

This privacy statement describes how PRO collects, uses, and discloses personal information, and outlines the privacy and information security practices PRO has adopted in compliance with Canadian federal and provincial laws.

COLLECTION AND USE OF PERSONAL INFORMATION

EMPLOYEES AND CONTRACTORS

EXAMPLES OF INFORMATION COLLECTED

- Contact information – eg. name, phone, email, address
- Legal information – eg. SIN
- Payroll information – eg. PAC Account, SalaryPerformance appraisal results

USES OF INFORMATION

- Management of the employment/contractual relationship
- Payroll
- Legally required reporting – eg. payroll tax
- Background checks

PROSPECT, CLIENT AND SUPPLIER REPRESENTATIVES

EXAMPLES OF INFORMATION COLLECTED

- Contact information – eg. name, phone, email, address

USES OF INFORMATION

- Identification and access to PRO systems (as required in the normal course of the engagement relationship)
- Marketing (to Prospects and Clients)
- Background checks (on Supplier Representatives, if needed)

CLIENT CUSTOMERS

EXAMPLES OF INFORMATION COLLECTED

- Unique identifier for each balance sheet security – eg. investments, loans, and deposits
- Balance sheet security parameters relevant to financial modelling – eg. balance, interest rate, term, origination date, maturity date

USES OF INFORMATION

- Identification of balance sheet securities uniquely and consistently to calculate future cash flows in the financial model (core to delivery of contracted services to clients)
- Communication of data quality issues with specific balance sheet securities to clients for remediation

The unique identifier for each balance sheet security does not need to be meaningful to the originating banking system (eg. client account number). PRO recommends clients de-identify records prior to delivery to PRO.

DISCLOSURE OF PERSONAL INFORMATION

PRO may disclose the personal information of PRO, client, and supplier staff or contractors to PRO's Managed Service Provider to set up new identities for authorized individuals and to provide them with access to PRO systems, or to a service provider to perform background checks prior to granting such access.

PRO does not disclose the personal information of our, or our clients and suppliers staff or contractors for any other reason, except as may be required by law.

PRO does not disclose personal information of clients' customers for any reason.

Personal information from prospects collected to market PRO's products and services is not disclosed for any reason. An individual or legal entity may opt out of receiving marketing from PRO at any time.

PROTECTION OF PERSONAL INFORMATION

CONTROLS TO PREVENT UNAUTHORIZED ACCESS, USE, OR MODIFICATION OF PERSONAL INFORMATION

- Access controls – eg. identity, authorization and role-based
- Technical security controls – eg. firewalls, endpoint protection, intrusion detection and prevention tools, and encryption
- Physical controls – eg. controlled access to data processing sites, offices, equipment, and files
- Organizational controls – eg. background checks, security awareness program, privacy training, and compliance procedures

GOVERNANCE

CODE OF CONDUCT

- Privacy principles are embedded in the Code of Conduct and Privacy Policy
- The Code is agreed to in writing by all employees and contractors
- The Code outlines disciplinary measures for non-compliance, up to and including termination

PRIVACY OFFICER

- Accountable for the establishment and implementation of policies, controls, and procedures to protect personal information
- Responsible for supervising compliance with legislation, regulations, policies, procedures and guidelines relating to privacy and protection of personal information.

CHALLENGING COMPLIANCE

If you have any questions or concerns regarding this Privacy Statement, or if you would like to review your personal information if held by PRO, please contact PRO's Privacy Officer:

Andrew Clauson
208-173 Forester St, North Vancouver, BC V7H 0A6
privacy@profinancial.bc.ca

Alternatively, you may also seek advice and direction from the Office of the Privacy Commissioner of Canada or any provincial Privacy Commissioner having jurisdiction in the matter.