Barry E. Johnson Insurance Agency Inc.

Privacy Policy and Practices

Barry E Johnson Insurance Agency Inc, operating as Barry Johnson Financial Group has been in business since 1984.

Barry Johnson Financial has long practiced confidentiality in the handling of all personal information it has collected from our clients. We only use the information we are given to provide the services for which we have been retained. These services include:

… Individual Life Insurance; (Living Benefits; Long Term Disability; Long Term Care; Critical Illness)

… Individual Financial Planning

… Group Retirement Consulting

We have designed this Privacy Policy based on the Canadian Standards Association Model Code for the Protection of Personal Information and the Federal Personal Information Protection and Electronic Documents Act ("PIPEDA"). Within this policy we will address how the Staff of Barry Johnson Financial intend to collect, use and disclose Personal information in the context of these principals. This policy reflects our commitment to the privacy of our clients' Personal Information. We may disclose Personal information to any individual or organization for services that are provided to assist us in the conduct of our mandate, including an individual or organization that performs services on our behalf but only if that individual or organization agrees to use the Personal information solely for the purposes of performing tasks on behalf of and under our instruction with respect to that information, to act in a manner consistent with the relevant principles articulated in this Privacy Policy.

In order to be certain you are aware of the scope of the information to which our Privacy Policy refers, please note the following definition (as defined in PIPEDA):

1. **Accountability**

The Personal Information we collect, or is provided, is used and disclosed for the purposes of conducting the services for which we provided.

In order to further affirm our commitment to maintaining the confidentiality and privacy of our client's personal information , we have done the following:

> Developed and adopted this Privacy Policy and have a Privacy Officer on matters of Privacy relating to our use, disclosure, security and retention of personal or personal Health information. Our Privacy Officer will also be responsible for maintaining this Policy and updating staff on changes to both privacy legislation and business practices. We will update all staff of privacy related issues and legislation.

2. **Identify the purpose**

We collect personal information in the course of providing services to our clients. The following is an example of circumstances in which we may be provided or required to collect personal information.

Personal Life Insurance Consulting
Financial Planning Consulting
Employer provided pension plan administration, pension calculations and payments

3. **Obtain consent**

Consent to use personal information is required to be obtained at the time of its collection. If we collect the personal information directly from an individual we will obtain express consent for the collection, use and disclosure of such information.

4. **Limit Collection**

We limit the collection of personal information to that which is reasonably required to accurately complete the services for which we have been retained. We are committed to respecting the privacy of an individual's personal information and will not collect personal information which is not reasonably required.

5. **Limit use, disclosure and retention**:

We limit its use and disclosure of personal information to the purpose(s) described at the time the information is collected. We retain personal information only as long as is necessary to completely fulfill our services. We maintain a record retention policy. The retention policy has been developed to meet our retention requirements consistent with good business practices and known industry standards. In the event that we decide to purchase, sell, reorganize or transfer the assets of a business, including any Personal information held by that business, our client information may be subject to review for such purpose by another party. Should we or such other party wish to use any Personal information for purposes not described herein, then consent for such use of the information will first be obtained.

Note: As with all companies we may be lawfully bound to disclose personal information for purposes other than those described at the time consent was obtained. These purposes have been described in applicable privacy legislation as those designed to protect personal and/or public interest.

6. **Be Accurate**

We recognize that personal information can change. We encourage our clients to keep their personal information current so that we may provide the best services possible. If we are working with a company to manage a company sponsored pension plan, members will be required to inform their employer of any changes to their personal information..

Where we have a direct client relationship, personal information can be changed as directed by our staff upon inquiry by email, phone or fax.

Within a reasonable time of being notified we will update member records to reflect changes in personal information.

7. **Use appropriate safeguards**

We have inventoried the various ways in which we store information and have taken reasonable measures to ensure the security of information within our premises and in our system databases.

Furthermore we will required our staff to sign a confidentiality agreement within which is detailed the firm's expectation that staff will respect and safeguard client information. Through this agreement employees are aware that a breach of confidentiality could result in termination of their employment.

8. **Be Open**

Our Privacy Officer is mandated to ensure that our Privacy Policy and Internal Security and Record Retention policies are maintained. Should you wish to question why specific information is required , our Privacy Officer is available to answer any such inquiries.

In all matters of privacy, including access requests and privacy concerns, we encourage our clients to contact our Privacy Officer at: beve.jeffery@barryjohnson.com

9. **Give Individual Access**

It is extremely important for clients to know that they have access to their personal information. Requests for personal information held by us or corrections to such information can be made by contacting the sponsoring employer, or, in the case of direct client relationships, personal information can be requested or corrected by contacting our Privacy Officer by email, phone or fax. In response to such requests we will correct or provide that personal information which can be corrected or retrieved at a reasonable cost to us or the sponsoring employer and will do so in a timely madder. In order to guard against fraudulent requests for access we will require sufficient information to allow us to confirm the identity of the personal making the request before granting access or making corrections.

Note: As is the case with all companies we may be lawfully bound to deny access of an individual to their personal information. Reasons for such denial have been described in applicable privacy legislation as those designed to protect personal and/or public interest.

Provide recourse

We will review any and all concerns over privacy matters that are submitted to us. Privacy concerns are managed by our Privacy Officer, who provides both a response to the concern as well as contact information for regulatory authorities. Our Privacy Officer will use any concerns to assist in measuring the effectiveness of our Privacy Policy as well as our business practices. Amendments to our Privacy Policy will be described on our website alongside the updated policy. Whether or not Personal information already collected and used by us will be affected by any such amendments , will also be discussed on our website alongside the notice of change