



# Business Critical

## CLIENT PRIVACY

Business Critical and our partners collect the personal and business information of our clients to offer them customized and appropriate strategies and does the utmost to keep this information up to date to provide them with ongoing high-quality service. Maintaining the security of our clients' personal information is a top priority for Business Critical and our Privacy Policy sets high standards for collection, transferring, sharing, disclosing and storing such personal information.

As required by legislation, Business Critical complies with the Personal Information and Electronic Documents Act (PIPEDA), protecting the personal and business information of our clients and maintaining the highest standards of security of such information. Business Critical is legally required under FINTRAC (Financial Transactions and Reports Analysis Centre of Canada) to report criminal or terrorist financing activity. Additionally, Business Critical complies with the CRTC Unsolicited Telecommunications Rules, including the National Do-Not-Call List, and the Canadian Anti-Spam Law (CASL), as required legally.

Business Critical abides by the ten principles of Privacy set out in PIPEDA and has designed this policy and internal procedures to ensure our clients' personal information is collected, used, transferred, shared and disclosed only for identified business purposes and only with the consent of its clients, except where otherwise required for legal or security purposes.

Our Principles of Privacy are as follows:

1. **Accountability** – Business Critical is accountable for keeping the information we have about our clients safe and secure. Through a series of internal practices and controls and contractual agreements with external suppliers and service providers, we ensure the personal information that we collect, use, transfer, share disclose and retain is secure and used only for identified business purposes or as required by law. A Privacy Compliance Officer has been designated to whom requests for more information on policies and procedures may be made or inquiries regarding our complaints procedure can be directed.
2. **Identifying Purposes** - At Business Critical, we collect only the information we need from our clients for the



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business purposes which we identify to our clients in writing, either before or at the time we collect the information. We collect personal information to offer high quality, specialized and unique retirement, insurance, and legal products to our clients.

3. Consent - Our goal is to be transparent to our clients in the collection and use of their information. We obtain our client's express consent before we collect, transfer, share or disclose any personal client information except where the collection, transfer, sharing or disclosing is for legal or security purposes.

4. Limiting Collection - At Business Critical, we collect only the personal client information that is necessary in order to develop specialized and unique strategies for our clients and we do so with our client's consent, except where authorized by law. We never collect more information about our clients than is needed for the purposes which we identify to our clients.

5. Limiting Use, Disclosure and Retention - Our client's personal information is not used, disclosed or retained for any purpose other than those expressly identified to our clients or as required by law. We keep our client information only if necessary for the fulfillment of the identified business purposes and as is necessary for legal, regulatory and limitation of action purposes.

6. Accuracy - At Business Critical, we endeavor to keep our client's personal information as accurate, complete and up-to-date as possible for the purposes for which it is to be used. We regularly update client information to ensure accuracy and to continue to offer high quality service to existing clients.

7. Safeguards - At Business Critical, we have in place internal practices and controls to ensure security safeguards which are appropriate to the sensitivity of the personal information which we collect and retain. These safeguards include physical, technological and organizational measures all designed to limit access to client personal information to a need-to-know basis and to keep the personal information secured against loss, theft, unauthorized access, disclosure, copying use or modification. Our employees are committed and contractually bound to maintain the confidentiality of all client information. We screen anyone who requests client personal information to ensure information is only transferred, shared or disclosed to authorized third parties.



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8. Openness - At our client's request, Business Critical will make available additional information about our policies and internal practices and controls relating to the management and safeguarding of client personal information.

9. Access to Information - At any time clients may request to be informed of the existence, use and disclosure of their personal information and Business Critical will provide access to that information. We encourage our clients to update their personal information and allow them to verify the accuracy and completeness of any personal information we may hold. There may be limited circumstances in which information cannot be disclosed for legal, security or commercial proprietary reasons. In these cases, we will advise our clients of the reasons why they cannot access this information.

10. Challenging Compliance - Always we encourage our clients to express to us any concerns they may have regarding our compliance with the ten principles of Privacy described in this policy. Where clients have questions about the way we safeguard personal information, they may be directed to our Privacy and Compliance Officer:

Philip Setter

Business Critical

Managing Partner

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The collection and use of our client's personal information is fundamental to the day-to-day business operation at Business Critical. Protecting client privacy and maintaining the highest standards of security with respect to client information is a top priority. If you have any questions, we encourage you to contact our Privacy Compliance Officer.



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