

# McLean Budden Privacy Policy



McLEAN BUDDEN  
LOOK FORWARD™

# Privacy Policy

Protecting the privacy of clients and employees is a top priority at McLean Budden Limited (MB). Below is an outline of our 10 Privacy Principles. We hope that these Principles give you comfort so that you will have every confidence that the information you submit to us will be treated with the utmost confidentiality. These principles have been built upon the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's Personal Information Protection and Electronic Documents Act.

MB may disclose your personal information to our data processor providers, custodians and trustees for the purpose of providing specific client services such as producing quarterly reports, statements and tax slips. For this purpose, MB will only disclose information that is crucial for the third party to complete the task.

## 1. Accountability

MB is responsible for keeping the information we collect, retain and use about you safe and protected. If you ever have any concerns about MB's accountability in this regard, contact us and you will be put in contact with the designated individual who is accountable for the firm's compliance with the Ten Privacy Principles.

## 2. Identifying Purposes

The purpose for which we collect your personal information shall be identified by MB or an employee of MB at or before the time the information is collected. Only such information as is necessary to MB's business will be collected.

### 3. Consent

Before MB collects, uses or discloses any personal information about you we will inform you, orally or in writing, of the purpose for which we are collecting, using or disclosing your information. MB will always obtain your consent prior to using or disclosing your information, with the exception of personal information collected, used or disclosed for legal or security purposes.

### 4. Limiting Collection

Only such information as is necessary to MB's business may be collected from you. When personal information is needed, it should be obtained directly from you. If necessary, only reputable and reliable sources will be used to supplement this information.

### 5. Limiting Use, Disclosure and Retention

Your personal information will not be used or disclosed for purposes other than those for which it was collected, except with your consent or as required by law. The length of time that we retain your personal information may vary depending on the product or service that we provide to you and the nature of the information. MB will only keep your personal information in our records so long as it is needed for the identified purposes or as required by law. Once the information is no longer needed, it will be destroyed.

MB does not collect any personal information about those who visit MB's website for browsing purposes only. Personal information is collected if a request is made for any mail or literature requests. The information provided by the potential client will only be used to respond to the inquiry. MB's website contains links to other websites. If you click on one of those links and enter another website, MB is not liable for any personal information you might have provided when you entered that website.

## 6. Accuracy

MB will keep your personal information as accurate, complete and up-to-date as necessary for the purposes for which it is to be used.

## 7. Safeguards

MB is as concerned with protecting your personal information as you are. We have taken all appropriate measures and put in place controls aimed at protecting your confidential data. These measures include restricting physical access to our offices and records and the use of passwords and encryption for on-line activities. Access to your personal information is limited to those employees with legitimate business reason to seek the information.

## 8. Openness

MB will make available, upon your request, information concerning the policies and procedures that apply to the management of your personal information.

## 9. Individual Access

Upon your request, you will be informed of the existence, use and disclosure of your personal information and shall be given access to that information. You may verify the accuracy and completeness of the information and may request that it be amended, if appropriate.

## 10. Challenging Compliance

MB has appointed a Chief Privacy Officer to handle all privacy issues. If you have any questions, concerns or issues about our Privacy Policy or about confidentiality issues or other issues raised here, you may contact us as follows:

By mail  
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