

# Personal Information Protection Policy

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## **Preamble**

FlexiFonds de solidarité FTQ ("FlexiFonds"), a wholly-owned subsidiary of the Fonds de solidarité FTQ, is committed to protecting the privacy of its clients, that is, any person who has opened an investment account with FlexiFonds, and its employees, and to ensuring the confidentiality of the personal information entrusted to it for the purposes of its activities, while complying with the Act Respecting the Protection of Personal Information in the Private Sector (the "Act").

## **Policy objectives**

The privacy policy outlines the terms and conditions concerning the collection, use, disclosure and storage of personal information obtained in the course of FlexiFonds' business. The policy explains how FlexiFonds protects the personal information it obtains and all access rights to it.

## **Scope of the policy**

The policy applies to all FlexiFonds staff, including mutual fund representatives, salaried employees and executives. This policy also applies to individuals whose professional services are retained on a contractual basis. They are referred to individually as "employee" and collectively as "employees," unless otherwise specified.

## **Personal information**

Personal information is defined as any information or combination of information that serves to identify a physical person, such as name, address, phone number or email, and the value of investments held in the client's account. This list is non-exhaustive. Employees must consult the chief compliance officer when in doubt as to the nature of a piece of information concerning a physical person, to determine if it is considered personal information.

Personal information must be protected regardless of the medium or form, whether written, graphic, sound, visual, computer or any other form.

## **Detailed provisions**

### **Collection of information**

FlexiFonds must collect information concerning its clients and employees in order to provide premium quality services or as part of FlexiFonds' business. The nature and sensitivity of information collected may vary based on the services provided by or to FlexiFonds, as well as the legal requirements with which FlexiFonds must comply.

The purposes for which a file is created and personal information is collected are determined before or at the time the information is collected. For example: when opening an account; making an additional investment; submitting a request for a redemption or a switch.

The purposes for which information is collected are generally to open an account, confirm a person's identity, understand the client's needs, propose financial products and services that may

meet the client's investment objectives, prevent fraud, issue the required tax slips and communicate information concerning FlexiFonds and the products it distributes.

### **Consent, collection and use**

Flexifonds informs every person that it is collecting information about them, the purposes for which it is being collected and how the information will be used.

Consent must be given by the individual concerned or by a duly authorized person. Flexifonds collects personal information directly from the individuals concerned, unless consent has been obtained to gather information from a third party, or as authorized by law.

Consent may be withdrawn at any time, subject to legal or contractual restrictions.

In the event that a client refuses to give consent or withdraws consent, flexifonds may not be able to provide them with products or services likely to be of interest to them.

### **Limits for collecting, using and disclosing information**

FlexiFonds limits the collection of personal information to what is necessary for the purposes of its mutual fund brokerage activities, particularly as principal distributor of the Fonds de solidarité FTQ's investment fund units defined as "FlexiFonds Funds." In addition, this personal information is accessible only to the persons authorized to access them and for whom it is necessary to discharge their duties.

FlexiFonds may not divulge any personal information to anyone without obtaining prior consent except where required by Law. For example, FlexiFonds may, without consent from the person concerned, disclose personal information in a file it holds on that person, in particular to the Director of Criminal and Penal Prosecutions, if the information is needed for purposes of prosecution for violating a law applicable in Quebec.

Sharing personal and financial information with the investment fund manager is an inherent part of the role of principal distributor that is played by FlexiFonds. Much information deemed necessary to be collected by FlexiFonds employees must also be accessible to the Fonds de solidarité FTQ—the investment fund manager of the FlexiFonds Funds.

Additionally, personal information may be shared with third parties such as securities regulatory authorities, self-regulatory organizations, the Financial Transactions and Reports Analysis Centre of Canada and any other body authorized by law.

FlexiFonds may share, under certain circumstances, personal information with third-party service providers or suppliers to ensure the proper administration of services such as access to, servicing and maintenance of the computer platform; the printing of statements of accounts and tax slips; and marketing activities.

### **Retention and destruction**

FlexiFonds retains personal information for as long as necessary for the purposes for which they were collected and in accordance with legislative restrictions. FlexiFonds must destroy such

information in accordance with the applicable legislation and regulations. When FlexiFonds destroys personal information, it takes the necessary measures to ensure confidentiality.

#### **Nominative list**

A list of names (comprising the names and addresses of clients) may be compiled and shared, or information serving to compile such a list may be shared, with companies related to FlexiFonds for the purpose of commercial or philanthropic prospecting, in accordance with the law and by giving the people concerned a valid opportunity to refuse that this information be used by a third party for the purposes of commercial or philanthropic prospecting (e.g. by allowing the person concerned to request the removal of their name prior to the list being disclosed).

FlexiFonds does not sell personal information that has been entrusted to it as part of its business operations.

#### **Accuracy**

FlexiFonds makes every effort to ensure that the personal information it holds is as accurate and comprehensive as necessary for the purposes for which it was collected, used and disclosed.

However, it is the responsibility of every client and employee to promptly inform FlexiFonds of any change in name, address or any other relevant modification to be made to the client's personal information.

#### **Responsibility**

FlexiFonds is responsible for all personal information it has in its possession, including information entrusted to third parties.

FlexiFonds takes reasonable steps to inform and train its employees on its policies and procedures concerning the protection of personal information.

#### **Security measures**

Security measures are in place to protect personal information against loss or theft, or any unauthorized access, disclosure, copying, use or modification.

These security measures include organizational measures such as restricted access to what is necessary, physical measures, and technological measures such as the use of passwords.

#### **Requesting access to information and correction**

Any person has the right to know if FlexiFonds holds personal information about them, to view this information, obtain a copy of it, check its accuracy, request a correction and find out to whom the information may have been disclosed.

The information will be provided within thirty (30) days of receiving a written request. A reasonable fee may be charged to cover the costs of transcription, duplication or transmission of information.

FlexiFonds may refuse to disclose to a person certain personal information about them when required to by Law, in particular if disclosing such information could result in revealing personal information about a third party.

All requests for information or correction must be submitted to the following address:

Chief Compliance Officer  
FlexiFonds de solidarité FTQ  
545 Crémazie Blvd. East  
Suite 200  
Montréal, Québec H2M 2W4

#### **Concerns and complaints**

FlexiFonds employees can address any questions and concerns about the protection of personal information and anyone can seek information by contacting FlexiFonds at 514-850-4981 or 1-833-383-2121 or by email at [info@flexifondsftq.com](mailto:info@flexifondsftq.com).

Any complaint concerning the protection of personal information must be submitted to the Officer in Charge of the Protection of Personal Information at the above address.