



PRIVACY POLICY

Privacy Statement

The Significance of Your Personal Data. Your personal information is of great value. At PHOENIX HORIZON INVESTMENTS CORP., we are dedicated to safeguarding the personal information you confide in us. Our commitment extends to a continuous reassessment of our practices, ensuring they remain current and in alignment with the highest standards in privacy and personal information management.

Safeguarding the Security of Your Personal Information. At the core of our commitment is the protection of your personal information. But what exactly qualifies as personal information? It is any data that pertains to you and has the potential to identify you, whether directly or indirectly.

***Principles to Uphold Privacy Protection.** Our commitment to preserving your privacy is rooted in four core principles that guide our actions:

Ensuring Robust Management: We enforce effective management and protective measures to secure your personal data while maintaining diligent oversight.

Respecting Your Rights: Your rights concerning the personal information we hold are yours to exercise at any time.

Providing Transparency: We grant you full visibility into our privacy procedures, ensuring access to all relevant details.

Acting Responsibly: Every member of our team, along with our suppliers and agents, is bound by our privacy policies. Our Chief Privacy Officer maintains vigilance over these commitments to ensure ongoing compliance and relevance.

***Efficient Data Collection Procedures.** Our data collection strategy revolves around gathering only essential information for our operations. This information may originate from various sources, depending on specific scenarios, including:

Directly from You: We primarily obtain your personal information directly from you, ensuring your active participation in data sharing.

Alternate Sources: In certain situations, we may acquire information from diverse channels, such as:

Government Organizations: When needed, we may gather information from governmental organizations.

Individual Recommendations: Data provided by individuals designated as personal references.

Selection and Engagement of Advisors, and Compliance Services: This encompasses data collected through services like Apexa Corp, vital for our advisory processes.

Tax Agencies: Information sourced from entities like the Canada Revenue Agency and Revenue Québec.

Providers of Professional Liability Insurance: Relevant data regarding professional liability insurance, where applicable.

Credit Bureaus and Reporting Agencies: Information from credit bureaus and reporting entities, particularly in financial contexts.

Financial Institutions, Insurance Providers, and Related Parties: Information from your prior or ongoing contractual affiliations with financial institutions, insurance companies, and other pertinent entities may also be collected when necessary.

How We Gather Your Personal Information

Our methods for collecting your personal information encompass several approaches:

Phone: Information may be collected when engaging with you over the phone.

In-Person: Personal information may be acquired through face-to-face interactions.

Paper and Online Forms: We collect data from the completion of both physical and digital forms.

Cookies: When you visit our websites, data may be gathered through cookies.

Types of Personal Information We Collect

We exclusively collect personal information that is essential for fulfilling the purposes delineated in this notice. Here are illustrative examples of the personal information we may collect.

Examples of Information Categories

1. Personal Identification Details:

- Full name
- Date of birth
- Gender assigned at birth
- Current or past residential addresses
- Email addresses
- Contact phone numbers
- Language preferences
- Government-issued identifiers (e.g., passport numbers, driver's license details)
- Social insurance numbers

2. Financial Data:

- Bank account particulars

- Credit history and scoring information
- Compensation details
- Debts and obligations
- Financial status, including instances of bankruptcy if any

3. Insurance-Related Particulars:

- Specifics regarding professional liability insurance

4. Professional and Occupational Information:

- Employment status
- Present and prior employers
- Educational background, encompassing degrees and certifications
- Licensing details
- Previous work experience
- Associations with financial institutions or general agents
- Business connections
- Instances of potential conflicts of interest
- Information regarding any criminal history or disciplinary sanctions, where applicable

Additionally, we might generate or deduce information from the personal data we gather. Our management and protection of this data align with the same practices employed for the remainder of your personal information.

*Specific Data Collection Purposes

Our acquisition, utilization, disclosure, and retention of your personal information are exclusively dedicated to the objectives elucidated in this notification. We will apprise you of these designated purposes either at the time of or prior to the collection of your personal information.

The subsequent purposes are intrinsic to your autonomous contractor business partnership with us, and their applicability hinges on your contractual affiliation with our organization:

*Categories Specific purposes

Establish and manage our contractual relationship with you as an independent contractor: compensation, computer equipment, absences, and termination of contract.

- Assess and evaluate your contract applications, encompassing reference checks, credit assessments, criminal background checks, and disciplinary investigations.

- Oversee and administer your contractual agreement with PPI and insurance providers.
- Process your compensation, including commissions and royalties, and issue corresponding tax documentation.
- Disseminate pertinent remuneration information to relevant parties, such as line managers.
- Facilitate access to IT services.
- Manage suspensions, cancellations, or contract terminations effectively.

Provide access to our tools and enable us to optimize them.

- Authenticate your identity for access to our sales and administration tools.
- Gain insights into your utilization of our sales and administration tools and websites to enhance their functionality.
- Analyze tool usage to provide tailored training aimed at optimizing your efficiency and productivity.

Comply with the law, manage risks, and handle complaints.

- Detect, prevent, and mitigate fraud, as well as unauthorized or illicit activities like money laundering and cyber threats.
- Address client concerns or complaints and those from other organizations or individuals.
- Monitor business practices to ensure compliance with sound business principles and regulatory obligations.
- Verify transactions.
- Offer training to you and our staff.
- Fulfill legal obligations and requirements stipulated by courts, regulatory bodies, or self-regulatory organizations.
- Assess the adequacy of advice provided and the suitability of products offered.
- Stay informed about any potential disciplinary actions against you by third parties, such as regulatory authorities, and take timely action when necessary.

Ensure continuity of our customer relationship during contract suspension, termination, or expiration, periods of absence or disability, or the transfer of your right of representation to us or another advisor.

- Grant access to information on some or all of your files to another advisor for seamless client service continuation.

Improve advisor recruitment and retention, as well as their development, productivity, and overall experience.

- Analyze and enhance the contracting process.
- Investigate and reduce contract terminations by understanding advisor concerns.
- Provide support throughout your sales process and enhance your development, productivity, and compensation.
- Develop reports and dashboards to enhance the overall advisor experience and sustain long-lasting contractual relationships.
- Assess, comprehend, and enhance your satisfaction with your advisor experience based on your unique profile, reality, and evolution. This includes surveys, web tools, or customized interviews.
- Acquire in-depth knowledge of your profile to formulate strategies and growth opportunities for advisor loyalty and business development. This may involve client development, utilization of appropriate tools and solutions, and sales behavior training.

*Sharing Your Personal Information

Who may receive your personal information?

To achieve the objectives delineated in this notification, it may be necessary to share your personal information with other entities or individuals. We may share this information with the following third parties, for instance:

- Credit agencies and reporting bureaus, such as Equifax or TransUnion.
- Firms specializing in advisor selection, contracting, and compliance monitoring, such as Apexa Corp.
- Databases associated with public and private insurance, fraud detection, and claims.
- Other insurers, reinsurers, and financial institutions.
- Managing general agents and providers of specialized coverage, including professional liability insurance.
- Suppliers offering services like document printing, delivery, data storage, and administrative or sales systems.
- Courts, regulatory authorities, or self-regulatory organizations.
- Tax authorities, such as the Canada Revenue Agency and Revenu Québec.

***Sharing your personal information beyond Canadian borders**

While we primarily store your personal information within Canada, there may be occasions where we must disclose it to entities outside of the country, such as when we engage with suppliers based in foreign territories. In such cases, we contractually ensure that our suppliers adhere to our standards for the management and protection of your personal information. Prior to any transfer of your personal information beyond Canada, we make certain that it is suitably safeguarded.

***Obtaining Your Consent, Except as Required by Law**

When do we seek your consent?

We request your consent before collecting, using, or disclosing your personal information. In most cases, this consent is directly obtained from you.

***Reacquiring your consent**

Should we wish to utilize or disclose your personal information for a purpose to which you have not initially consented, we will request your consent again.

***Instances where your consent is not required**

In certain situations, legal provisions permit the collection, use, or disclosure of your personal information without your consent. Here are a few examples:

- Sharing your personal information with suppliers for purposes outlined in this notice.
- Conducting statistical studies employing de-identified personal data, as allowed by law.
- Taking necessary measures in response to suspected fraud.
- Exclusive to Québec: Employing your personal information if it is evidently in your best interest or for purposes closely linked to those to which you have already agreed.
- Beyond Québec: Using or disclosing your personal information if it is clearly to your advantage, and consent cannot be obtained.

Additionally, we may be obligated by law to disclose personal information, such as when mandated by a court or upon request from a regulatory authority or self-regulatory body.

*Our Dedication to Safeguarding Your Personal Information

A shared commitment to safeguarding your personal information exists among our employees and stakeholders. Our internal procedures meticulously outline the roles and responsibilities regarding personal information management.

Exercising stringent control over access and utilization of your personal information

Access to your personal information is rigorously limited to those individuals who require it for their professional duties. Several measures are in place to monitor and manage access to your personal information:

- Comprehensive training is provided to our employees, agents, and consultants to ensure the careful and responsible handling of your personal information, aligned with best management practices. Our suppliers are held to the same obligations.
- Our employees, agents, and suppliers are granted access to and may utilize the personal information we collect solely if we have obtained explicit consent for such purposes or if allowed by applicable laws.
- We periodically assess and adjust the access privileges of our employees, agents, and suppliers based on their specific roles and responsibilities.

*We ensure the security of our facilities and IT systems

We have implemented a range of security measures to safeguard our IT platforms, facilities, and systems. Your personal information enjoys continuous protection through the efforts of a multidisciplinary team, advanced monitoring tools, and state-of-the-art technological environments.

Some of the security measures in effect include:

Technological safeguards:

- Implementation of multi-factor authentication where available.
- Application of data encryption techniques.
- Use of digital certificates to secure data.
- Deployment of robust firewalls to protect against unauthorized access.

Physical and administrative precautions:

- Access to our IT systems and facilities is restricted and requires authorization.
- Continuous monitoring of our physical facilities is in place to enhance security.

*We limit the retention of your personal information

Your personal information is retained for the shortest time necessary to:

- Achieve the purposes for which it was originally collected.
- Fulfill our legal obligations.

We have instituted a retention schedule that provides guidance on the appropriate duration for retaining each category of personal information, contextual to its use. Once the retention period has concluded, we securely destroy the personal information. The duration of this period is influenced by various factors, including our legal and regulatory responsibilities, as well as the time required to protect our rights in the event of legal actions.

In certain cases, we may anonymize specific personal information before disposal, retaining a de-identified copy. Anonymized data can no longer be used to identify individuals and is no longer classified as personal information. This anonymized data is used for purposes like enhancing our services, identifying trends, and establishing performance metrics.

*We uphold your privacy rights

Manage your consent preferences

You have the ability to withdraw your consent for the collection, use, and disclosure of your personal information at any time. This consent management feature allows you to customize your privacy preferences:

Accessing, Correcting, or Deleting Your Personal Information

You possess various rights concerning your personal information held by us, which you can exercise at any time.

Understanding Your Personal Information

You can inquire about:

- The existence of personal information related to you.
- The manner in which your personal information was collected, used, and disclosed.
- Whether any third parties or organizations hold your personal information on our behalf.

Accessing Your Personal Information

You have the right to access the personal information we have concerning you. You may also request a copy of it, though a reasonable fee may apply for this service. In certain situations, we might not be able to provide you with specific information, especially if it would reveal details about another individual.

Correcting Your Personal Information

Should your personal information be incomplete or inaccurate, you can request that we rectify it. Updates to your information due to changes are also welcomed.

Deleting Your Personal Information

You can ask us to delete your personal information, and our response will be dependent on the circumstances. If we have already fulfilled the original purposes for collecting your personal information, we will proceed with its deletion. However, we may retain it to comply with legal and regulatory obligations or to safeguard our rights in case of legal actions. If the initial purposes have not yet been satisfied, we will delete outdated, inaccurate, incomplete, or no longer necessary information. Keep in mind that if you request the deletion of all your personal information, we may not be able to continue providing our services to you.

To exercise any of these rights regarding your personal information, please submit a written request. You will receive a written response within 30 days. In the event of a partial or full denial of your request, we will provide you with specific details, including:

- The reasons for the denial.
- References to applicable laws and regulations justifying the denial.
- Your right to challenge the denial through the privacy regulatory authority in your province or territory.
- The timeframe within which you may appeal the denial.

Submitting a Complaint

If you believe that we have mishandled your personal information, you have the option to file a complaint. We encourage you to reach out to us first should you wish to file a complaint, as we are dedicated to reviewing and working with you to address the issue.

Alternatively, you may choose to file a complaint with the privacy regulatory authority in your province or territory.

How to Reach Us Regarding Your Privacy

To contact us in writing for various privacy-related matters, including:

- Requesting access to, correction of, or deletion of your personal information.
- Filing a complaint concerning the management of your personal information.
- Seeking assistance, sharing feedback, or posing any questions related to your privacy.

Please ensure you provide us with all the necessary information to assist you effectively.

By Email: privacyofficer@phic.ca

By Mail:

Chief Privacy Officer

Phoenix Horizon Investments Corp.

9327 63 AVE NW

Edmonton, AB T6E0G2

Notice Updates

We consistently enhance our practices to reinforce their alignment with evolving privacy laws, regulations, and standards. Any significant changes to this notice will be communicated to you through the PHIC Website.