



## Privacy Policy

At GritBooks Inc., respecting privacy is an important part of our commitment to our clients and employees.

Our commitment to privacy is reflected in The GritBooks Inc. Privacy Code, which has been developed to comply with the relevant portions of the Personal Information and Electronic Documents Act (Canada). In this respect, The GritBooks Inc. Privacy Code governs our behaviour with respect to the collection, use and disclosure of our clients' and employees' personal information.

We have also developed The GritBooks Inc. Privacy Protection Pledge to explain why we collect personal information, how we use personal information and how we keep such information protected. A copy of The GritBooks Inc. Privacy Protection Pledge is being made available to all of our clients.

### THE GRITBOOKS INC. PRIVACY PROTECTION PLEDGE

At GritBooks Inc., we respect your privacy. That is why we have developed The GritBooks Inc. Privacy Code of which the objective is to specify GritBooks Inc.'s guidelines for the collection, use and disclosure of your personal information.

The GritBooks Inc. Privacy Code was developed to comply with the relevant portions of the Personal Information Protection and Electronic Documents Act (Canada). We have drafted

The GritBooks Inc. Privacy Code to facilitate our compliance with this new legislation and to demonstrate our commitment to protecting your personal information.

We have also developed The GritBooks Inc. Privacy Protection Pledge. We want you to understand the purposes for which we collect personal information. We also want to make certain that we have your consent to continue to collect, use and disclose your personal information for those purposes.

The following is a brief synopsis of our privacy practices:

### **Why do we need to collect your personal information?**

If you are a GritBooks Inc. client, GritBooks Inc. may have collected some basic information about you. We respect your privacy, which is why we collect personal information only for the following purposes:

We collect personal information about our individual clients for the purposes of providing professional advice and services to them. Usually the scope of advice and service is set out in detail in a formal engagement letter with the client.

We also collect information about individual shareholders, employees and directors of organization in the course of providing services to our clients. This information is collected as necessary to properly evaluate and plan the structure and activities of these organizations as mandated by our engagement with them. This information is not utilized to review or analyze the personal financial affairs of any of these individuals, unless that is the subject of a separate engagement.

If an individual also is involved in organizations for which we are separately retained to provide services, we will use their personal information for the purpose of coordinating the collective financial affairs of the individual and these organizations, as well as verifying the accuracy and consistency of information relevant to both engagements.

If instructed by you, we will add individual client names and contact details to our client database, in order to allow us to send them materials relating to our general services. If a client prefers that we do not send this type of material they can let us know in writing and their contact details will then not be utilized in this fashion.

### **When do we disclose personal information?**

There is a variety of circumstances where we may need to disclose personal information about our clients. Generally, we only disclose personal information of our clients as instructed by them. There are , however, a number of exceptions for disclosure that may be made without consent:

As required by applicable law (court order, investigation of suspected fraud).

To defend our firm in proceedings arising from statements or opinions issued by us in the course of our engagements.

To service providers in circumstances where we remain in control of the information (IT outsourcing).

To professional regulatory bodies, as required by legislation, rules, policies or codes governing our profession.

### **How do we protect your personal information?**

In order to protect your personal information, GritBooks Inc.:

1. will not collect, use or disclose your personal information for any purpose other than those identified above, except with your further consent;
2. will protect your personal information with appropriate security safeguards;
3. will protect the confidentiality of your personal information when dealing with other organizations;
4. will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above; and
5. will honour any request you may make for access to your personal information.

### **What are your choices?**

We would like to have your consent to continue to collect, use and disclose your personal information for the purposes identified above. However, you do have choices and can refuse or withdraw your consent as follows:

1. You may refuse to provide your personal information to us.
2. You may also withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

However, in either case, this may limit our ability to serve you.

If you have any questions or concerns about our personal information management system, please contact the GritBooks Inc. Privacy Officer at [jennifer@gritbooks.ca](mailto:jennifer@gritbooks.ca). Otherwise, we will assume that we have your consent to collect, use and disclose your personal information for the purposes identified above and in a manner consistent with The GritBooks Inc. Privacy Code.

Please visit the Office of the Privacy Commissioner of Canada's web site at [www.priv.gc.ca](http://www.priv.gc.ca)

## THE GRITBOOKS INC. PRIVACY CODE

### **Introduction**

At GritBooks Inc., respecting privacy is an important part of our commitment to our clients and employees. That is why we have developed The GritBooks Inc. Privacy Code. The GritBooks Inc. Privacy Code is a statement of principles and guidelines regarding the minimum requirements for the protection of personal information provided by GritBooks Inc. to its clients and employees. The objective of The GritBooks Inc. Privacy Code is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada).

GritBooks Inc. will continue to review The GritBooks Inc. Privacy Code to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

### **Summary of Principles**

#### Principle 1 – Accountability

GritBooks Inc. is responsible for personal information under its control and shall designate one or more persons who are accountable for GritBooks Inc.'s compliance with the following principles.

#### Principle 2 - Identifying Purposes for Collection of Personal Information

GritBooks Inc. shall identify the purposes for which personal information is collected at or before the time the information is collected.

#### Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a client or employee are required for the collection, use, or disclosure of personal information, except where inappropriate.

#### Principle 4 - Limiting Collection of Personal Information

GritBooks Inc. shall limit the collection of personal information to that which is necessary for the purposes identified by GritBooks Inc. GritBooks Inc. shall collect personal information by fair and lawful means.

#### Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

GritBooks Inc. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

#### Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

#### Principle 7 - Security Safeguards

GritBooks Inc. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

#### Principle 8 - Openness Concerning Policies and Procedures

GritBooks Inc. shall make readily available to clients and employees specific information about its policies and procedures relating to the management of personal information.

## Principle 9 - client and Employee Access to Personal Information

GritBooks Inc. shall inform a client or employee of the existence, use, and disclosure of his or her personal information upon request and shall give the individual access to that information. A client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## Principle 10 - Challenging Compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for GritBooks Inc.'s compliance with The GritBooks Inc. Privacy Code.

## Scope and Application

The ten principles that form the basis of The GritBooks Inc. Privacy Code are interrelated and GritBooks Inc. shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the Personal Information Protection and Electronic Documents Act (Canada), the commentary in The GritBooks Inc. Privacy Code has been drafted to reflect personal information issues specific to GritBooks Inc.

The scope and application of The GritBooks Inc. Privacy Code are as follows:

The GritBooks Inc. Privacy Code applies to personal information collected, used, or disclosed by GritBooks Inc. in the course of commercial activities.

The GritBooks Inc. Privacy Code applies to the management of personal information in any form, whether oral, electronic or written.

The GritBooks Inc. Privacy Code does not impose any limits on the collection, use or disclosure of the following information by GritBooks Inc.:

- a. an employee's name, title or business address or telephone number;
- b. information that GritBooks Inc. collects, uses or discloses for journalistic, artistic or literary purposes and does not collect, use or disclose for any other purpose; or

c. other information about the individual that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act (Canada).

The GritBooks Inc. Privacy Code will not typically apply to information regarding GritBooks Inc.'s corporate clients. However, such information may be protected by other GritBooks Inc. policies and practices and through contractual arrangements.

The application of The GritBooks Inc. Privacy Code is subject to the requirements and provisions of the Personal Information Protection and Electronic Documents Act (Canada), the regulations enacted hereunder, and any other applicable legislation or regulation.

## **Definitions**

**collection:** The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**consent:** Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of GritBooks Inc. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**client:** An individual who purchases or otherwise acquires or uses any of GritBooks Inc.'s products or services or otherwise provides personal information to GritBooks Inc. in the course of GritBooks Inc.'s commercial activities.

**disclosure:** Making personal information available to a third party.

**employee:** An employee of or independent contractor to GritBooks Inc..

**personal information:** Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

**third party:** An individual or organization outside of GritBooks Inc.

**use:** The treatment, handling, and management of personal information by and within GritBooks Inc. or by a third party with the knowledge and approval of GritBooks Inc.

## **The GritBooks Inc. Privacy Code in Detail**

### **Principle 1 – Accountability**

GritBooks Inc. is responsible for personal information under its control and shall designate one or more persons who are accountable for GritBooks Inc.'s compliance with the following principles.

1. Responsibility for compliance with the provisions of The GritBooks Inc. Privacy Code rests with the GritBooks Inc. Privacy Officer who can be reached at [jennifer@gritbooks.ca](mailto:jennifer@gritbooks.ca). Other individuals within GritBooks Inc. may be delegated to act on behalf of The GritBooks Inc. Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.
2. GritBooks Inc. shall make known, upon request, the title of the person or persons designated to oversee GritBooks Inc.'s compliance with The GritBooks Inc. Privacy Code.
3. GritBooks Inc. is responsible for personal information in its possession or control. GritBooks Inc. shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.
4. GritBooks Inc. shall implement policies and procedures to give effect to The GritBooks Inc. Privacy Code, including:
  - a. implementing procedures to protect personal information and to oversee GritBooks Inc.'s compliance with The GritBooks Inc. Privacy Code;
  - b. implementing procedures to receive and respond to complaints or inquiries;
  - c. training and communicating to staff about GritBooks Inc.'s policies and procedures; and
  - d. developing information materials to explain GritBooks Inc.'s policies and procedures.

## Principle 2 - Identifying Purposes for Collection of Personal Information

GritBooks Inc. shall identify the purposes for which personal information is collected at or before the time the information is collected.

GritBooks Inc. collects personal information only for the following purposes:

1. We collect personal information about our individual clients for the purposes of providing professional advice and services to them. Usually the scope of advice and service is set out in detail in a formal engagement letter with the client.
2. As part of our client services these purposes include evaluating, monitoring and assessing the tax and accounting requirements of our clients, recommending changes to asset structures, recommending changes to liability provisions and risk management and strategy consultations for items such as tax disputes.



We also collect information about individual shareholders, employees and directors of organization in the course of providing services to our clients. This information is collected as necessary to properly evaluate and plan the structure and activities of these organizations as mandated by our engagement with them. This information is not utilized to review or analyze the personal financial affairs of any of these individuals, unless that is the subject of a separate engagement.

If an individual also is involved in organizations for which we are separately retained to provide services, we will use their personal information for the purpose of coordinating the collective financial affairs of the individual and these organizations, as well as verifying the accuracy and consistency of information relevant to both engagements.

If instructed by you, we will add individual client names and contact details to our client database, in order to allow us to send them materials relating to our general services. If a client prefers that we do not send this type of material they can let us know in writing and their contact details will then not be utilized in this fashion.

Further reference to "identified purposes" mean the purposes identified in this Principle.

3. GritBooks Inc. shall specify orally, electronically or in writing the identified purposes to the client or employee at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within GritBooks Inc. who can explain the purposes.

4. When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the client or employee will be acquired before the information will be used or disclosed for the new purpose.

### Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a client or employee are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances

personal information can be collected, used, or disclosed without the knowledge and consent of the individual.

1. In obtaining consent, GritBooks Inc. shall use reasonable efforts to ensure that a client or employee is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the client or employee.
2. Generally, GritBooks Inc. shall seek consent to use and disclose personal information at the same time it collects the information. However, GritBooks Inc. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.
3. GritBooks Inc. may require clients to consent to the collection, use and/or disclosure of personal information as a condition of the supply of a product or service only if such collection, use and/or disclosure is required to fulfill the explicitly specified, and legitimate identified purposes.
4. In determining the appropriate form of consent, GritBooks Inc. shall take into account the sensitivity of the personal information and the reasonable expectations of its clients and employees.
5. The purchase or use of products and services by a client, or the acceptance of employment or benefits by an employee, may constitute implied consent for GritBooks Inc. to collect, use and disclose personal information for the identified purposes.
6. A client or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. clients and employees may contact GritBooks Inc. for more information regarding the implications of withdrawing consent.
7. GritBooks Inc. may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.
8. GritBooks Inc. may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a contravention of a law.
9. GritBooks Inc. may collect, use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.
10. GritBooks Inc. may use or disclose personal information without knowledge or consent to a lawyer representing GritBooks Inc., to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

#### Principle 4 - Limiting Collection of Personal Information

GritBooks Inc. shall limit the collection of personal information to that which is necessary for the purposes identified by GritBooks Inc. GritBooks Inc. shall collect personal information by fair and lawful means.

1. GritBooks Inc. collects personal information primarily from its clients or employees.
2. GritBooks Inc. may also collect personal information from other sources including credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

#### Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

GritBooks Inc. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. GritBooks Inc. shall retain personal information only as long as necessary for the fulfillment of those purposes.

1. GritBooks Inc. may disclose a client's personal information to:
  - a. As required by applicable law (court order, investigation of suspected fraud).
  - b. To defend our firm in proceedings arising from statements or opinions issued by us in the course of our engagements.
  - c. To service providers in circumstances where we remain in control of the information (IT outsourcing).
  - d. To professional regulatory bodies, as required by legislation, rules, policies or codes governing our profession.
2. GritBooks Inc. may disclose personal information about its employees to:
  - a. We will only collect, use and disclose personal employee information without express consent when it is reasonable for the particular purpose of the establishment, administration, management and termination of the employment relationship. Administration of the employment relationship will include interaction with benefit providers and others in the provision of our employee benefit plans.

- b. We will disclose personal employee information without the individual's consent to another organization in responding to a request for a reference only when you have provided specific consent for this to occur.
  - c. Personal information of employees can also be collected, used and disclosed without the individual's consent where required or permitted by applicable law.
  - d. In other circumstances, the consent of the employee will be required for any use or disclosure of their personal information.
3. Only GritBooks Inc.'s employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about clients and employees.
  4. GritBooks Inc. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a client or employee, GritBooks Inc. shall retain, for a period of time that is reasonably sufficient to allow for access by the client or employee, either the actual information or the rationale for making the decision.
  5. GritBooks Inc. shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

#### Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

1. Personal information used by GritBooks Inc. shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a client or employee.

GritBooks Inc. shall update personal information about clients and employees as necessary to fulfill the identified purposes or upon notification by the individual.

#### Principle 7 - Security Safeguards

GritBooks Inc. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

1. GritBooks Inc. shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.
2. GritBooks Inc. shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of GritBooks Inc.'s employees with access to personal information shall be required to respect the confidentiality of that information.

#### Principle 8 - Openness Concerning Policies and Procedures

GritBooks Inc. shall make readily available to clients and employees specific information about its policies and procedures relating to the management of personal information.

1. GritBooks Inc. shall make information about its policies and procedures easy to understand, including:
  - a. the title and address of the person or persons accountable for GritBooks Inc.'s compliance with The GritBooks Inc. Privacy Code and to whom inquiries and/or complaints can be forwarded;
  - b. the means of gaining access to personal information held by GritBooks Inc.;
  - c. a description of the type of personal information held by GritBooks Inc., including a general account of its use; and
  - d. a description of what personal information is made available to related organizations (e.g., subsidiaries).
2. GritBooks Inc. shall make available information to help clients and employees exercise control of the collection, use and/or disclosure of their personal information and, where applicable, privacy-enhancing services available from GritBooks Inc.

#### Principle 9 - client and Employee Access to Personal Information

Upon request, GritBooks Inc. shall inform a client or employee of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. A client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

1. Upon request, GritBooks Inc. shall afford clients and employees a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.
2. In certain situations, GritBooks Inc. may not be able to provide access to all the personal information that it holds about a client or employee. For example, GritBooks Inc. may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, GritBooks Inc. may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of the laws of Canada or a province.
3. Upon request, GritBooks Inc. shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, GritBooks Inc. shall provide a list of third parties to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.
4. In order to safeguard personal information, a client or employee may be required to provide sufficient identification information to permit GritBooks Inc. to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.
5. GritBooks Inc. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, GritBooks Inc. shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.
6. Clients and employees can obtain information or seek access to their individual files by contacting the GritBooks Inc. Privacy Officer.

#### Principle 10 - Challenging Compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for GritBooks Inc.'s compliance with The GritBooks Inc. Privacy Code.

1. GritBooks Inc. shall maintain procedures for addressing and responding to all inquiries or complaints from its clients and employees regarding GritBooks Inc.'s handling of personal information.
2. GritBooks Inc. shall inform its clients and employees about the existence of these procedures as well as the availability of complaint procedures.
3. The person or persons accountable for compliance with The GritBooks Inc. Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.
4. GritBooks Inc. shall investigate all complaints concerning compliance with The GritBooks Inc. Privacy Code. If a complaint is found to be justified, GritBooks Inc. shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A client or employee shall be informed of the outcome of the investigation regarding his or her complaint.

#### Additional Information

For more information regarding The GritBooks Inc. Privacy Code, please contact the GritBooks Inc. Privacy Officer at [jennifer@gritbooks.ca](mailto:jennifer@gritbooks.ca).

Please visit the Privacy Commissioner of Canada's web site at [www.priv.gc.ca](http://www.priv.gc.ca)