

# Privacy Policy

At Prime Pension & Benefit Consulting Ltd, we are committed to maintaining the highest standards of integrity in our business. In the course of our business, it is necessary to collect, record, store, process, transmit, and otherwise handle Personal Information about individuals. We take these activities seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices.

If you have any questions or comments about Prime Pension & Benefit Consulting Ltd.'s Privacy Policy, you can contact Marc Prymack directly at 403 862 1009 or email: [mprymack@primeconsulting.ca](mailto:mprymack@primeconsulting.ca)

## We will obtain your consent

The purpose for which Personal Information is collected will be specified on or before the collection of the information, and any change of purpose will be communicated to you. This consent will be expressed in writing, given verbally, electronically, or through an authorized representative. In limited circumstances consent can also be implied.

Consent to collect, use and disclose Personal Information can be withdrawn at any time, subject to legal and contractual restrictions and reasonable notice.

## We will limit collection, use, disclosure and retention of personal information

### Collection

Only required information for the purpose(s) identified will be collected. Only lawful means will be used to collect personal information. To the extent appropriate:

- Personal Information will be obtained directly from you; and
- Prior to collecting Personal Information from any other source, you will be notified or your written authorization will be obtained.

### Use and disclosure

Personal information will not be used or disclosed for purposes other than those specified to you, except:

- Where required by law; or
- Where reasonably necessary, to determine eligibility for a benefit; or
- To protect the interests of Prime Pension & Benefit Consulting Ltd. against criminal activity, fraud, and material misrepresentation in connection with a contract.

### Retention of records

We will keep Personal Information only as long as it is necessary, including for the purposes of updating the product or services or as required by law. When the Personal Information is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorized parties from gaining access to the information during and after the process.

### Disclosure to self-regulatory organizations

For regulatory purposes, regulator may require access to personal information of current and former clients and others that has been collected or used by Prime Pension & Benefit Consulting Ltd. and other Regulated Persons. Regulator collect, use or disclose such personal information obtained from Prime Pension & Benefit Consulting Ltd. and other Regulated Persons for regulatory purposes, including:

- Surveillance of trading-related activity
- Sales, financial compliance, and other regulatory audits
- Investigation of potential regulatory and statutory violations
- Regulatory databases
- Enforcement or disciplinary proceedings
- Information-sharing with other regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing

### **We will safeguard information in our custody**

We have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorized disclosure, use or modification. Access to Personal Information is restricted to employees and authorized service providers who need it to perform their work.

### **We will provide you access to your file**

You have the right to be informed of the nature and source of Personal Information that Prime Pension & Benefit Consulting Ltd. has on its records concerning you.

Should you wish to receive a copy of the documents Prime Pension & Benefit Consulting Ltd. has on its records, minimal reproduction and handling fees may be asked. You will be informed of the charge before the documents are reproduced.

You also have the right to request the correction of inaccurate, incomplete or obsolete information in your file. If demonstrated to our satisfaction that the information held in our record is inaccurate or incomplete, we will make the necessary changes.

Any request to access or correct information held in our records should be made in writing to:

Prime Pension & Benefit Consulting Ltd.  
Attn: Marc Prymack,  
811, 1108 – 6<sup>th</sup> Ave. SW, Calgary, AB T2P 5K1

If you are not satisfied as to how we have handled your personal information, you may register a Privacy related complaint by contacting:

Prime Pension & Benefit Consulting Ltd.  
Attn: Marc Prymack  
811, 1108 – 6<sup>th</sup> Ave. SW, Calgary, AB T2P 5K1

We will explain our complaints handling procedure and inform you of other complaint procedures that may be available to you. If a complaint is justified, we will take appropriate action to resolve the situation and if necessary change our Policies, Procedures or Practices