

RLB LLP Privacy and Data Policy

THE ACCOUNTING FIRM OF RLB LLP knows how important your privacy is to you. Our commitment to our clients and others is to respect and protect the privacy and confidentiality of personal and business information that is entrusted to us in the course of rendering services to our clients. As Chartered Accountants we are governed by the Institute of Chartered Accountants of Ontario Rules of Professional Conduct, which have always and will continue to protect the privacy and confidentiality of your personal information.

For these reasons, we have created the following privacy and data policy. It confirms our commitment to protecting your privacy and maintaining the trust that you have placed in our accounting firm. In this privacy and data policy we explain how we collect and use personal information and your rights related to its collection and use.

If you have any questions regarding this Privacy Policy, you can reach our privacy office by email at privacyofficer@rlb.ca You can also contact us by mail at:

RLB LLP ATTN: PRIVACY OFFICER
197 Hanlon Creek Blvd. Unit 103
Guelph, Ontario, Canada, N1C 0A1

1. WHEN DOES THIS PRIVACY POLICY APPLY?

This Privacy Policy applies to a wide range of activities, including when you:

- visit our websites: rlb.ca, people.rlb.ca, digital.rlb.ca, wealth.rlb.ca and any websites which we operate from time to time;
- submit your personal data for an employment opportunity or join our community;
- subscribe to, use or access our online services;
- register for conferences, educational activities and events which we organize;
- participate in a survey or research initiative;
- download resources from our websites, such as tax information; and
- otherwise interact with us (together, our “Services”).

This Privacy Policy does not apply to third party websites, applications, or services, even where they may be linked to our Services. For example, our websites may include links to the websites of other organizations that we collaborate with; if you click on a link to another website, that website is not covered by this Privacy Policy. We encourage you to review all third-party privacy policies and notices prior to using third party websites, applications or services

2. WHAT IS PERSONAL DATA?

In this Privacy Policy, when we use the term “personal data”, we mean any information that relates to you, as an identified or identifiable natural person. The personal data that we collect depends on the circumstances (see question 3. “What personal data do we collect about you, and for what purposes?”).

Some of the information which we consider as personal data for the purpose of this Privacy Policy may not be protected under applicable laws, and you may not be entitled to the same rights regarding such personal data.

Personal data may include information collected about you through cookies and tracking technologies such as beacons and web pixels (together, the “cookies”). Cookies are small blocks of data which are installed on a browser or a device during a session, and which remembers preferences or information about you. Learn more about how we use cookies. Learn more about our practices regarding the use of cookies and interest-based advertising in our Cookie Policy.

3. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU, AND FOR WHAT PURPOSES?

Our firm collects personal information for the following purposes:

- I. To provide, maintain, improve, and enhance our services to you;
- II. To understand and analyze how you use our services and develop new products, services, features, and functionality
- III. To facilitate purchases of products or services that you order;
- IV. To advise and assist you with personal and financial planning, retirement and succession planning, and other business and personal advisory services;
- V. To understand your needs and determine the suitability of other services we may be able to offer you;
- VI. To process job applications;
- VII. To conduct marketing and advertising, including developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you; and
- VIII. To share, as reasonably required, for the purposes stated above, within our group of businesses

Examples: Identification data, contact information, professional information, affiliation data, and financial information, Responses to surveys, forms, questionnaires, marketing preferences, cookies, number of visits.

4. CONSENT TO COLLECT INFORMATION ABOVE AND BEYOND SECTION 3.

Our firm is committed to ensuring that you are aware of how your personal information is used. We will not collect, use, or disclose your personal information without your consent, unless required to by law. By providing us with your personal information for the purposes listed above, you consent to our collection and use of the information for those purposes. With respect to personal information that you provide for the preparation of your tax or other services, you consent to our transmitting such personal information to the appropriate government or regulatory authorities.

If we wish to collect your personal information for purposes other than as stated above, we may request that you consent, verbally or in writing, to such collection. If we wish to use personal information that we have already collected, for a purpose other than as stated above, then we will first seek your consent to such use.

We may periodically request written confirmation from you to ensure that the personal information collected and maintained by us is up-to-date and accurate. We also may ensure that we have your continuing consent to the use and retention of your personal information.

You have the right to refuse or withdraw your consent to the collection, use, and disclosure of your personal information. In some cases such refusal or withdrawal may prohibit or adversely affect the completion of our professional engagement. We will advise you if that is the case.

Our firm will disclose your personal information, for other than the purposes stated above, only if required to do so by law. We will notify you of such disclosure and provide you with the reason that obligates us to release the personal information.

4. LIMITING THE COLLECTION OF PERSONAL INFORMATION

Our firm restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

5. DO WE SHARE PERSONAL DATA WITH THIRD PARTIES?

We do not rent or sell your information or share it with any third party unless it is necessary to fulfill a request or inquiry from you. If required to by law, we reserve the right to disclose your personally identifiable information. RLB LLP data practices and privacy policy comply with Canada Personal Information Protection Act (PIPEDA)

6. HOW DO WE PROTECT YOUR PERSONAL DATA?

Our firm has developed and implemented security safeguards appropriate to the sensitivity of the personal information kept by us. These security safeguards include but are not limited to:

- Physical security measures, such as locked storage, restricted access to areas where personal information is stored; and
- Internal employee security measures, include restricted computer access, employee confidentiality agreements, employee training, and limited access to where personal information is stored;
- We have taken and will continue to take appropriate security measures to protect the confidentiality of electronically transferred personal information. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not guarantee, and you should not expect, that your personal information, searches, or other communications will always remain secure. Users should also take care with how they handle and disclose their personal information and should avoid sending personal information through insecure means.

Each and every one of our employees, partners and associates is responsible for maintaining the confidentiality and security of all personal information to which they have access. Our employees are trained to know and respect our privacy policy, and compliance with our policies and procedures for protecting personal information is a condition of their employment.

Personal information kept by us is disposed of or destroyed once it is no longer needed to meet the purposes for which it was collected. If at any point you wish for us to delete information about you, you can do this by contacting in writing to the address set out in HOW CAN YOU UNSUBSCRIBE FROM OUR COMMUNICATIONS.

We may also require you to assist us to safeguard your personal data. For instance, if you use an account on our client portal, you should use unique and strong passwords, not share your passwords with others, and promptly alert us if you believe your password has been compromised. You should only connect to our website or client portal via a safe network.

7. WHO HAS ACCESS TO YOUR INFORMATION

In order to provide the best service possible, RLB LLP employees are permitted to access the information they need to perform their jobs. However, we maintain strict internal policies against unauthorized disclosure or use of client information.

8. WHERE DO WE STORE YOUR PERSONAL INFORMATION

Generally, we retain your personal data at our offices in Ontario, Canada and data centres elsewhere in Canada.

In addition, unless prohibited by law, we may rely on service providers who are outside Canada who assist us with the Services, in which case your personal data may be stored in or accessed from the country where the service providers operate. In cases where the data is stored in the United States, your personal data will be subject to United States laws and may be subject to disclosure to United States governments, courts or law enforcement or regulatory agencies, pursuant to those laws. Subject to those laws, RLB LLP uses reasonable measures to protect your personal data as it would be protected in Canada. If you would like more information about our policies and practices regarding processing of personal data outside of Canada, please send us an email at privacyofficer@rlb.ca

9. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your personal data for as long as required for the purpose for which it was collected, or longer if we are required or permitted to do so under applicable laws.

10. WHAT ARE YOUR PERSONAL DATA RIGHTS?

The law provides you with rights regarding your personal data. These rights may change depending on where you are located, and they may not apply to all types of personal data. Most individuals have the right to access their personal data, the right to withdraw their consent to the use and disclosure of their personal data, and the right to request corrections to their personal data under certain circumstances, such as if the personal data is inaccurate or outdated.

In some cases, withdrawal of your consent may mean that we will no longer be able to provide you with our Services.

11. HOW CAN YOU UNSUBSCRIBE FROM OUR COMMUNICATIONS?

We provide clients and subscribers with various communications, such as electronic newsletters, event notifications, etc. You can unsubscribe at any time from such communications by using the link to unsubscribe included in our electronic messages, or you can contact us at marketing@rlb.ca

12. DO WE USE COOKIES ?

We may install our own cookies and third party cookies on your browser or device through our websites. Some of these cookies are uninstalled automatically at the end of your browsing session.

We use cookies for our websites to function as intended, to conduct marketing, to analyze our performance and to ensure that our websites are secure. Cookies are also useful to identify bugs and errors.

We collect cookies in each of the following categories:

Essential Cookies: Essential cookies are necessary to operate the core functions of our websites. These include login cookies, session ID cookies, language cookies as well as security cookies.

Functional Cookies: Functional cookies are used to provide you with certain website functionality, and to remember website preferences, consents and configurations.

Analytical Cookies: Analytical cookies are used to generate aggregated statistical data about traffic and behavior of our websites' users. For instance, we use [Google Analytics](#) to determine how visitors use our websites, such as with the number of visitors, from where our visitors come from on the web, the pages they visited and how much time was spent on our websites. We only see this data in an aggregated and traffic-based format, and we cannot see each visitor's data individually

13. HOW CAN I MANAGE MY COOKIE PREFERENCE?

From time to time, when you arrive at one of our Sites, you will be given the opportunity to allow all cookies, to accept only some cookies or to reject all cookies (via a cookie banner). The latter option may result in certain personalized services not being provided and you may not be able to take full advantage of all the features offered by our Sites.

14. DO WE UPDATE THIS PRIVACY POLICY?

Yes, we will update this Privacy Policy. There are many reasons why we may change this Privacy Policy, such as a legislative change or a change in how we collect, use, or disclose your personal data.