

PRIVACY STATEMENT

Personal information protection policy

Heaume Private Wealth is responsible for the personal information of its customers and its staff under its management. It is his responsibility to take all necessary measures to ensure the security of the personal and confidential information in his possession.

This privacy statement reflects our processes and describes our privacy practices to meet the requirements of applicable laws and professional responsibilities. This privacy statement also applies to affiliates and partners of Heaume Private Wealth.

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Personal information

The term “personal information” means information that concerns an identifiable individual, as more specifically defined by applicable privacy laws.

Heaume Private Wealth is committed to implementing best practices in the protection of personal information. We continually reassess our practices to maintain high management standards.

In the course of providing services to clients and conducting due diligence on our services (or discussing services we may offer), we will collect or obtain personal information from clients and their companies. We may also collect personal

information about you when you use this site or through your digital interactions with us.

We may collect or obtain this personal information subsequent to obtaining consent.

Valid and informed authorization from the client

The authorization is considered valid only if it is reasonable to expect that individuals understand the nature, purposes and consequences of the collection, use or disclosure of their personal information to which they consent.

From the beginning of the relationship with existing and potential customers, we obtain written consent for the collection, use and communication of their personal information.

We collect personal information primarily from the individual concerned. We may also collect it from other people, depending on the circumstances and the products or services desired.

A person who has or wishes to obtain a product or service may also provide us with personal information about other people who may benefit from that product or service. For example, this person could add an insured person. However, if this information is provided to Heaume Private Wealth, the person must, before transmitting this information to us, have obtained the appropriate consent or authorizations to allow us to collect, use and disclose this personal information.

Limiting the Collection of Personal Information

We limit the amount of personal information we collect to what is necessary and appropriate to fulfill the intended purposes.

When collecting personal information, we make all reasonable efforts to ensure that information about existing and prospective customers contained in customer records is accurate and updated or corrected as necessary. On occasion, customers and staff may be asked to update their personal information.

We also take the necessary measures to ensure that the information collected is used for the specified purposes and not for other purposes, and that it is not communicated to a third party without the consent of the existing or potential customer, unless otherwise indicated, contrary to the law.

How we collect your personal information

We may collect personal information in different ways, including:

- by telephone
 - For any request made by telephone, it is necessary to identify the person before providing any personal information.
- in person
- via our paper and online forms

What personal information do we collect

We collect only the personal information necessary to achieve the purposes stated in this statement.

Here are some examples of personal information we may collect.

Category	Examples of information
Personal information	Name, first name, gender, date of birth, social insurance number, telephone number, marital status, profession, driver's license number, relationships, and medical file.
Financial information	Remuneration, employer, financial statement, personal insurance portfolio, savings structure, legal aspects.

Protection of personal information

Appropriate safeguards are taken regarding the storage and destruction of personal information. All persons linked to Heaume Private Wealth or its employment are required to respect the procedures for this purpose.

Heaume Private Wealth uses a combination of technological, physical and organizational safeguards to protect personal information against theft and misuse, as well as unauthorized access, disclosure, reproduction, use or modification.

Encryption software, antiviruses and firewalls are installed and kept up to date on all technological tools used in a professional context to ensure data security. This includes encrypting sensitive data when it is stored or transmitted, including when it is transmitted to backup servers.

The protection measures of these technological tools are reviewed periodically and upgraded when necessary.

Access to personal information and records is granted to Heaume Private Wealth staff only when required to perform certain tasks. Heaume Private Wealth staff are aware of the importance of protecting the security and confidentiality of personal information. Confidentiality and non-disclosure agreements are signed upon hire.

Destruction of personal information

Personal information is retained only for the period it is necessary for the specified purposes, or as required or permitted by law. We are entirely responsible for the safe custody of these documents and for protecting their confidentiality.

Personal information that is no longer necessary for the purposes specified at the time of collection is securely destroyed or erased.

Document retention

Customer and staff records are retained for at least the minimum period stipulated by law.

Access to personal information

Under laws relating to the protection of personal information, customers have the right to access their personal information recorded in files maintained by Heaume Private Wealth. A request for access to your personal information or a request for information relating to the collection, use and disclosure of your personal information by Heaume Private Wealth must be submitted in writing to the person responsible for personal information at the following address:

Responsible for the protection of personal information
500-888 3e Avenue
Val-d'Or (Québec) J9P 5E6
Email: daniel@hgpp.ca

Third-party service providers

Heaume Private Wealth must obtain customer authorization before transferring personal information to a provider and retains control over the information when transferring personal information to a provider for processing.

Transfers of information to providers for processing, including cloud services, are made for a variety of reasons, including data storage and processing or manipulation of customer personal information.

Personal information must not, without consent, be used or communicated to a third party for purposes other than those for which it was collected, unless such use or communication is **required** or permitted by law.

Training program

All Heaume Private Wealth staff members receive training on the protection of personal information. This training is mandatory and must be completed before access to personal information is granted.

Training is an ongoing process and refresher training is followed regarding changes in laws, technology, service providers, new access to personal information or its new uses.

Roles and responsibilities of staff members

Where applicable, each Heaume Private Wealth staff member ensures that personal information is collected, stored, used and destroyed according to best practices. When a probable, anticipated or proven confidentiality incident is brought to the attention of a member of the organization, they will contact the person responsible for the protection of personal information. Heaume Private Wealth ensures that personal information is accessible to a staff member of its organization only if it is necessary for the performance of their duties.

Incidents and incident log

Heaume Private Wealth must keep a record of confidentiality incidents in accordance with the Private Sector Act and its regulations. When Heaume Private Wealth has reason to believe that a confidentiality incident involving one or more personal information that it holds has occurred, he must then take reasonable measures to reduce the risks of harm being caused and prevent new incidents of the same nature from occurring. Where applicable, if the incident presents a risk of serious harm, he must then notify the Commission d'accès à l'information du Québec as well as the person concerned in accordance with the Private Sector Act and its regulations. The assessment of the risk of harm is done in consultation with the person responsible for the protection of personal information and takes into account the sensitivity of the information concerned, the anticipated consequences of its use and the probability that it will be used for purposes harmful.

Complaint handling process

The person responsible for the protection of personal information receives complaints relating to the protection of personal information. When such a complaint is filed, the person responsible for the protection of personal information acknowledges receipt of it from the person concerned, reads its contents, investigates the circumstances and responds in writing in a diligent manner. If necessary, it may make recommendations to Heaume Private Wealth to improve the protection of personal information.

Changes to the Compliance Policy

Privacy laws evolve. Therefore, this policy may be modified by Heaume Private Wealth, at its sole discretion, without notice and without Heaume Private Wealth being held liable to you or any other person. The collection, use and disclosure of your personal information by Heaume Private Wealth is governed by the current version of this policy.

Responsible for the protection of personal information

We have appointed two (2) co-persons responsible for the protection of personal information, who monitor the protection of privacy and personal information on behalf of Heaume Private Wealth and its subsidiaries. We have also informed our staff of the existence of our *Privacy Statement*, as well as the role each must play in ensuring the protection of the personal information of our customers and staff. If you have any questions regarding our practices in this matter, do not hesitate to contact the persons responsible for the protection of personal information:

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