



Privacy Policy

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SECTION 1 INTRODUCTION

The Financial Advisors Association of Canada (TFAAC) operating under the brand name Advocis. Advocis is a voluntary membership association of financial advisors and planners in Canada. Advocis provides a platform of knowledge, advocacy, community and protection enhancing the professionalism of financial advisors and planners in the best interest of the consumer.

Advocis is committed to maintaining the accuracy, privacy and security of your personal information. This privacy policy (Policy) describes the personal information that Advocis and TFAAC Group Entities collect from you or about you, and how we use and to whom we disclose that information.

SECTION 2 DEFINITIONS

"Advocis" means the corporation without share capital formed under the laws of Canada under the name The Financial Advisors Association of Canada (TFAAC) and carrying on business under the brand "Advocis" (Advocis) and includes all operating units, National Committees Chapters and TFAAC separate legal entities known herein as the Advocis Group Entity.

"Advocis Group Entity" refers to a separate legal entity of TFAAC which includes but is not limited to the Institute (formerly the CLU Institute), the Advocis Protective Association (the APA), Advocis Broker Services Inc. (ABS Inc.) and GAMA International Canada (GAMA).

"Board of Directors" means the TFAAC Board of Directors.

"Board" for the purposes of this document refers to the TFAAC Board of Directors and includes the Board of any Advocis Group Entity.

"Chapter" means a Chapter of Advocis established by the Board of Directors of Advocis pursuant to its General By-laws and includes the Chapter Board.

"Director" means an individual on the TFAAC Board or the Board of an Advocis Group Entity.

"Non-member" means an individual who purchases our products or services and who is not a member of Advocis.

"Corporate Partner" refers to a company or other organization that or partners with Advocis to offer discounts on certain products and services or actively promotes or endorses Advocis products or services.

"Education Courses" means all of Advocis' formal training programs including but not limited to the following:

- Life License Qualification Program (LLQP);
- Chartered Life Underwriter program (CLU);
- Certified Financial Planner education program (CFP);
- Mutual Fund Licensing Course and other self study courses;
- Registered Health Underwriter program (RHU);
- Segregated Funds Course;
- Continuing Education programs including the CLU/CFP Update;

"Member" means a person who has applied for and been accepted into membership of Advocis.

"Person" means an individual or any business entity including a partnership, or corporation.

"Personal Information" means information about an identifiable individual including but not limited to the following,

- name, residential address, home telephone number, email address and date of birth.
- information relating to the education or employment history of the individual,
- any identifying number, symbol or other particular assigned to the individual,
- credit card or bank account information.

“**Policy**” means this Privacy Policy as may be amended from time to time.

“**Product**” means goods and services offered by Advocis from time to time and includes affinity products or services and includes but is not limited to Advocis published textbooks; Advocis courses and continuing education programs; CLU Institute Designation programs and Errors and Omissions Insurance.

“**Services**” means the membership services sold by Advocis to Members, Non-Members and interested parties and includes services offered to Non-members such as CE Accreditation of education programs as offered through the Institute.

“**Suppliers**” means any organization or person that provides goods or services to or for Advocis for its Members and Non-members.

“**TFAAC**” means The Financial Advisors Association of Canada (TFAAC) operating under the brand name Advocis (Advocis) and includes all operating units, Chapters, National Conferences, Committees and includes all TFAAC separate legal entities known collectively as the Advocis Group Entity.

“**Volunteer**” means a Member or Non-member of Advocis who serves on a Board, Committee, Task Force or individually in some other capacity to perform work for Advocis and any Advocis Group Entity without payment;

“**You**” and “**your**” refers to any individual who is a Member or Non-Member of Advocis.

“**We, Our or Us**” includes all units or businesses operating under the brand name Advocis and an Advocis Group Entity member and includes any program or joint venture any of these parties participates in.

SECTION 3 APPLICATION OF THE PRIVACY POLICY

(a) *Applies to the Board of Directors, Chapters, Volunteers and Employees of Advocis*

The terms and conditions of this Policy are applicable to all directors, officers, employees, chapters, volunteers, contract staff and consultants of Advocis and any Advocis Group Entity in relation to Personal Information of Members and Non-members.

(b) *Applies to Suppliers*

When personal information is provided to our suppliers with your consent, we require them to protect the information in a manner that is consistent with this Policy.

(c) *Does not apply to Clients of Members*

This Policy does not apply to clients of Members and Non-members or Corporate Partners.

SECTION 4 WHAT PERSONAL INFORMATION IS COLLECTED

(a) Types of Personal Information

The Personal Information, which we collect depends on the nature of your interaction with Advocis. For the most part the Personal Information, which we ask you from you at the time you register for membership or for a product or service includes, but is not limited to, contact information consisting of your name, mailing address, facsimile, email addresses and telephone numbers, your Advocis or other identification number, designations held, awards received, course registrations, date of birth, credit card information, educational history and licenses held respecting life insurance, accident and sickness, mutual funds, securities or property and casualty, professional liability (E & O insurance) certificates and bankruptcy status.

We also ask you to choose a password to verify your identity, and a unique question related to your password to verify your identity and provide you with access to online Advocis products and services.

(b) How we collect your Personal Information

We collect your Personal Information through application forms, online and electronic activity via our website at www.advocis.ca, by telephone, or through paper and online surveys and contests. We may collect Personal Information in person at meetings and events by collecting business cards, question forms and by confirmation of attendance forms.

Personal Information is collected by the national office and local Chapters. Advocis has 40 Chapters that operate in specified urban centers across Canada which offer products and services to Members and Non-members. Chapters are required to collect, use and disclose Personal Information in accordance with the provisions of this Policy.

(c) Consent

By providing us with your Personal Information, you consent to the collection, use and disclosure of Personal Information for the purposes identified in this Policy.

We ask you for contact information such as your telephone or fax number and email address for the purposes of marketing, including electronic marketing and telemarketing 1) Advocis and Advocis Group Entity products and services and 2) third party products and services that we believe may be of interest to you.

This consent applies to Advocis, Advocis Group Entities and any other company or organization that forms part of or joins Advocis in the future. Your consent is not a condition of doing business with us and you may withdraw it at any time by following the instructions below under the heading Opting Out which includes contacting us regarding any marketing or telemarketing issues by calling us toll free at 1-800-563 5822 or by email at info@advocis.ca.

We will obtain your consent before collecting, using or disclosing Personal Information for a purpose that has not been specified in this Policy, unless the new purpose is required by law.

SECTION 5 HOW YOUR PERSONAL INFORMATION IS COLLECTED, USED OR DISCLOSED

(a) For Membership and Volunteer Activities

Advocis collects Personal Information to provide you with the membership services and benefits and all related activities to which you are entitled as a member of Advocis. Much of the information that we have about you is collected from you at a time when you register for products and services we provide and also when you perform transactions or volunteer, (volunteers may include proctors, committee members, board members, chapter staff etc.).

(b) For Products and Services

Advocis collects Personal Information to provide you with the products and services you have requested as well as any other products and services that we think might be of interest to you.

We ask use your contact information such as your telephone or fax number and email address for the purposes of marketing, including telemarketing 1) Advocis and Advocis Group Entity products and services and 2) third party products and services that may be of interest to you.

(c) For Educational programs

Advocis collects Personal Information to provide you with the Education Courses and related services, continuing education programs and credits and other related benefits that you have purchased from Advocis or an Advocis Group Entity member. We collect Personal Information from you in order to provide you with appropriate education programs and courses and provide you with access to testing services.

Information collected on student records may be used to provide feedback to the students regarding marks on assignments and exams, to inform student of exam location, to ensure that students are receiving the proper courses ordered and to assist students in tracking their CE (Continuing Education) credits.

Advocis also collects Personal Information to provide you with study leaders and/or moderators who may help and guide you through your courses either in the classroom or online.

(d) For Transactions

We collect and use Personal Information to complete your transactions in relation to the Education Courses, services, products and Advocacy transactions that you do with us. We collect and maintain such information as your personal contact information, credit card or banking information, as well as any other relevant data required during the registration process.

We keep information about the types of services you purchase from Advocis Group Entities. Examples of this include membership applications, course registrations, payment history, awards, and designations.

(e) Find an Advisor (ouradvisor.ca)

We collect your Personal Information for inclusion in the Find an Advisor service. The Find an Advisor service is an Advocis online directory service that provides contact information about financial professionals published on the ouradvisor.ca website.

(f) *For the following additional purposes:*

- To communicate with you.
- To deliver services, newsletters, events, training that you request or purchase.
- To help us create and publish content most relevant to you.
- To alert you to special offers, updated information and other new services and products from Advocis, and Education and Corporate Partners or other third party supplier.
- To allow you access to limited-entry areas of our web sites as appropriate.
- To allow you to access online tests and exams through a third party provider in order to complete the education programs offered by Advocis.
- To provide the Chapters with updated mailing lists and contact information to facilitate all of the services outlined above.
- To allow you to maintain your designation(s) with the Institute.

Administrative Assistants

If authorized by you we may allow an administrative assistant to access your Personal Information and process transactions on your behalf. We will require this authorization in writing..

SECTION 6 DISCLOSURE OF PERSONAL INFORMATION TO OUTSIDE PARTIES

(a) *General – Confidential*

Personal information, such as name, address, telephone number, and other information voluntarily provided to Advocis during member registration processes is not distributed to third parties without your express consent provided either in writing, orally, or in electronic update on our websites.

(b) *Authorized by You*

Unless otherwise instructed, you hereby authorize us to collect, use and disclose Personal Information as may be appropriate or required to provide you with services or products you have requested including but not limited:

- To disclose the same, in whole or in part, to such third parties as may be necessary to deliver to you Membership, Education, Services, Products and Advocacy.
- To report results of Education programs or courses that you have taken or completed to regulators, your employer or sponsoring company, or any party identified by you to receive such information.

- To provide our corporate partners with lists of participants in our conferences and schools.
- To enable you to volunteer your services on behalf of Advocis to facilitate or lead study groups or committees.

(c) *Outside Service Suppliers*

At Advocis, we sometimes contract with outside organizations such as corporate partners, developers of CE programs, consultants for design and creation and web hosting companies to provide or perform specialized services (such as affinity programs). These trusted outside service suppliers may at times be responsible for processing and handling some of the Personal Information we have received from you. We provide our corporate partners with lists of participants in our conferences and schools.

When we contract with an outside supplier it is given only the Personal Information necessary to perform those services. Additionally, each such service supplier is prohibited from storing, analyzing, or using that Personal Information for purposes other than to carry out the service it has been contracted to provide.

We also occasionally hire other companies to provide limited services on our behalf, including but not limited to packaging, mailing, and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the Personal Information they need to deliver the service, and they are prohibited from using that Personal Information for any other purpose.

Where a third party service provider is located outside of Canada, your Personal Information may be accessible to regulatory authorities in accordance with the law of these jurisdictions. When Personal Information is provided to our service providers, we require them to protect the information in a manner that is consistent with this Policy and applicable Canadian privacy legislation.

(d) *Corporate Partners*

A corporate partner may provide Advocis with a complete or partial list of their advisors and/or employees (such as branch managers and regional directors) for the purpose of an Advocis communication such as for example our FORUM mailing offer.

(e) *Required By Law*

We may be compelled or required by law to disclose certain Personal Information for example in response to a court order or subpoena, to detect and prevent fraud or other criminal activity, or to comply with our legal and regulatory requirements.

(f) *Professional Conduct Enforcement*

Advisors belonging to Advocis and/or the Institute may be investigated based upon allegations submitted against of unprofessional conduct. Those advisors found in breach of the Advocis/Institute Code of Professional Conduct may be sanctioned publicly on the Advocis or Institute website and/or through press releases made to forms of public media such as local and national newspapers. Advocis and the Institute may also report to regulatory authorities and/or other organizations or persons as determined by a Hearing Panel such as the member's employer, MGA Owner, Regional Director or Branch Manager, or other person in an analogous role.

SECTION 7 WITHDRAWING CONSENT

(a) Withdrawing Consent

Where express or implied consent exists, your Personal Information will be used to communicate information to you on other Education, Services, Products and Advocacy matters, from Advocis or other suppliers, which we think might be of interest to you and as outlined in this Policy.

Subject to legal, regulatory and contractual requirements, you may withdraw your consent to our collection, use or disclosure of your Personal Information at any time by giving us reasonable notice. Depending on the circumstances, however, withdrawal of your consent may impact on our ability to provide you or to continue to provide you with some of the privileges and benefits of Advocis membership.

You cannot refuse our collection, use and disclosure of Personal Information required by third party suppliers essential for the administration and management of your membership.

You can tell us at any time to stop using Personal Information about you to promote Advocis and Advocis Group Entity products and services or the products and services of third parties we select. To opt out follow the process set out below or contact Advocis at 1 800 563 5822 or email us at info@advocis.ca.

You can opt-out of mailings by filling in the privacy form on our website at www.advocis.ca and via the unsubscribe button contained in the footer of all broadcast emails that we send. We will act on your instructions as quickly as possible but there may be certain uses of your information that we may not be able to stop immediately

You can select opting out in respect of the following materials:

1. Emails from Advocis
2. Emails from The Institute
3. Emails from GAMA International Canada
4. Emails from ABS inc. / APA
5. Advocis Chapters and Advocis Schools
6. Online Surveys
7. Professional Development/Educational information materials
8. Government/Industry Advocacy Materials
9. Advocis 'Find An Advisor' online directory
10. Third party information distributed by Advocis Partners / Affiliates
11. Permission to disclose information to an employer

SECTION 8 HOW WE SAFEGUARD YOUR PERSONAL INFORMATION

(a) General statement

We do our utmost to protect and safeguard your Personal Information using physical, electronic and procedural measures appropriate to the sensitivity of the information, including safeguards to protect your information against loss and theft, as well as unauthorized access, disclosure, copying, use, or modification.

(b) *Retention*

We retain Personal Information in accordance with this Policy, legislative requirements and documented guidelines and procedures established by Advocis. We will only keep your Personal Information for as long as it is required to fulfill the purposes for which it was collected. We may retain your information for a certain amount of time after you cease to be a Member, but only for so long as it is required for us to have the necessary information to respond to any issue that may arise at a later date.

(c) *On-line Security*

Advocis uses multiple layers of security controls to ensure that all recorded information in our files and computers systems are protected from unauthorized access and dissemination. Our systems are secured with combinations that may include layers of encryption, firewalls, and filtering routers monitoring outside access to our systems. It is equally important to Advocis that internal/remote user access is strictly controlled and monitored. We use multiple level password verification to ensure user authorization to our information systems. As additional security requirement if authorization attempts fail three times the user is locked out of our systems and can only be reactivated by an internal system administrator.

(d) *Employees and Volunteers*

In the course of daily operations, access to your Personal Information is restricted to those employees and volunteers who are authorized to and who have a legitimate business purpose and reason for looking at your Personal Information. For example, when you call us, the Membership Services Rep that handles your call has access to your file and can see your Personal Information on Education, Services, Products, and Advocacy.

Employees as a condition of employment are required to conform to all privacy policies and procedures. Employees, volunteers, consultants and member of the Board of Directors must sign a confidentiality agreement that prohibits disclosure of any Personal Information obtained while engaged in Advocis activities. All volunteers which includes board members, facilitators etc. must agree when they volunteer their services to sign a confidentiality agreement and to abide to keep all Personal Information confidential.

SECTION 9 ACCESSING AND AMENDING YOUR PERSONAL INFORMATION

(a) *Accessing and amending your Personal Information*

If you would like to access or update your Personal Information or account information, please call Advocis at 1 800 563 5822 or email us at info@advocis.ca. Please indicate clearly the information that you wish us to review or have changed. We will endeavour to reply to your request as soon as reasonably possible.

If you are a Member you may review and correct your membership Personal Information such as your name, address and contact Personal Information on line. To do so, go into the Advocis Web site www.advocis.ca and login to the member's only area.

SECTION 10 ABOUT COOKIES

(a) *What is a Cookie?*

A cookie is a small text file containing a unique identification number that a Web site sends to your computer's web browser. While you visit a particular site, a cookie may be used to track the activities of your browser as well as provide you with a consistent, more efficient experience. There are two common types of cookies: persistent and non-persistent.

Persistent cookies are stored on your computer's hard drive where they remain resident until they are either deleted or they reach a predetermined expiration date. Persistent cookies are most commonly used to provide visitors with a customized experience by recording preferences such as how a visitor prefers to have his/her Web pages displayed. Additionally, cookies are commonly used to gather statistical Personal Information such as the average time spent on a particular page. This kind of Personal Information is valuable for several reasons, including providing insight on how to improve the design, content and navigation of a Web site.

Non-persistent cookies do not permanently record data and they are not stored on your computer's hard drive. Rather, non-persistent cookies are stored in memory and are only available during an active session. Once a session ends, the cookie disappears. Non-persistent cookies are used primarily for technical reasons such as providing seamless navigation. For example, secure Advocis Web sites use non-persistent cookies in order to permit visitors to navigate through the pages without requiring them to log on to each additional page they wish to visit.

(b) How Cookies are used by Advocis

Cookies may be used by Advocis Web sites to improve functionality and in some cases, to provide visitors with a customized online experience. Advocis Web sites may use non-Persistent Cookies to improve operations and functionality. For example, these cookies improve navigation, maintain connectivity, and ensure online service sessions are secured. They do not contain personal or financial Personal Information and they are not permanently stored for future use.

(c) What are your choices in Relation to Cookies?

Advocis does not use cookies to gather personal information about you or data residing on your computer.

If you would like to browse the Advocis Web sites, you may do so without accepting cookies. However, you should choose not to accept cookies, some Advocis Web sites may not function properly or optimally and you will not be permitted to access certain secured sites. For example, if you would like to use a service such as Member Only Access, you may be required to accept the cookies that have been engineered to sustain session integrity and enhanced security before proceeding.

Cookies are widely used and most Web browsers are configured initially to accept cookies automatically. If you prefer not to accept cookies, you may adjust your browser settings to alert you when a cookie is about to be sent, or you may configure your browser to refuse cookies automatically. If you would like to learn more about how to set your cookie options, please refer to your browser's documentation or online help for instructions.

SECTION 11 EXTERNAL LINKS

(a) External Links

The www.advoics.ca website may contain links or references to other websites to which this Policy does not apply. For example, when you click a link to take advantage of other third party services, our website may indicate that you are leaving www.advocis.ca and using a third-party website for those purposes. When providing personal information on other websites not controlled or owned by Advocis, we encourage you to read the privacy policy of those sites.

SECTION 12 QUESTIONS, CONCERNS, COMPLAINTS

(a) Questions

If you have a general question or you have a concern regarding this Policy please contact us by calling us at 1-800 – 563-5822.

(b) Concerns and Complaints

If you have a concern or complaint about the Policy or the Personal Information handling practices of Advocis, please contact Advocis Member Services at 1-800-563-5822 or email us at privacy@advocis.ca. If you are not completely satisfied with our response you may contact the Office of the Privacy Commissioner of Canada.

SECTION 13 UPDATING THE PRIVACY POLICY

This Policy may be amended from time to time to ensure the protection of your Personal Information and compliance with privacy legislation. If we make any substantial changes, we will notify you by posting a notice and the revised Policy on the www.advocis.ca website.

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