

INDEPENDENT ADVISOR SOLUTIONS

Privacy Policy

Commitment to privacy

Independent Advisor Solutions Inc. (“IAS”, “we”, “us” or “our”) is committed to protecting the privacy of your personal information. We know how important your privacy is to you. Under this policy (“Policy”), we have adopted the following principles and guidelines that set out how we collect, use, and disclose personal information, and how we hold ourselves accountable and accessible to you.

In this policy, the term “Dealer” refers to any individual or entity that serves as, or claims to serve as, your investment advisor, broker, or dealer. By applying for our products or services, you acknowledge and consent to your Dealer acting as your agent. This allows us to accept and act on any communication that we reasonably believe comes from you or your Dealer on your behalf. We are not required to verify whether your Dealer is properly authorized to act as your agent or to make decisions on your behalf.

Personal information

Personal information is any information that identifies you as an individual. We will hold the personal information that you provide to fulfill the investments or services you request of us, which might include, your name, address, telephone number, social insurance number (“SIN”), birth date, account holdings, and the name, address, and SIN of your spouse and/or beneficiary, where applicable, among other information. Personal information does not include publicly available information (for example, names, addresses and telephone numbers which are published in telephone directories) or any information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession, such as the individual’s name, position name or title, work address, work telephone number, work fax number or work email address.

How we collect and use personal information

We collect personal information when we receive an application for a product or service for an investment with iAS. We only collect personal information necessary to comply with the instruction you or the Dealer have given us, which actions include:

- Verifying your identity;
- Setting up and managing your account, including recording and storing account holdings and transaction details;
- executing transactions with or through iAS including transferring funds by electronic or other means;
- supplying you or your Dealer with all necessary documents, including:
 - account statements,
 - transaction confirmations,
 - tax receipts,
 - proxy mailings,
 - and other information which you or your Dealer may request;
- to comply with legal and regulatory requirements, including disclosure requirements connected with tax, auditing, and securities legislation; and

- and to otherwise administer the products and services you have requested.

Personal information we typically collect from our individual clients include that individual's name, address, telephone number, social insurance number ("SIN"), date of birth, employment information, bank information, investment information, as well as relevant personal information regarding that individual's spouse. The information we collect depends on the products or services you request and in most cases is required by law or Canadian securities regulatory bodies.

When we disclose personal information

There are a variety of circumstances where we may need to disclose some of your personal information.

iAS may share your personal information with affiliated iAS companies for the purposes of administering accounts, preventing and detecting criminal activity (including fraud, misrepresentation, or cyber threats), ensuring compliance oversight, and, where your consent has been obtained, conducting optional marketing activities, and determining eligibility for additional or new products and services. iAS affiliated companies include Wellington-Altus Financial Inc., Wellington-Altus Private Wealth Inc., Wellington-Altus Private Counsel Inc., Wellington-Altus USA Inc., Wellington-Altus Shared Services Inc., Wellington-Altus Insurance Inc., and Wellington-Altus Group Solutions Inc.

Other times we may disclose your personal information is to your legal, tax, financial, banking and other advisors so that they may provide appropriate advice and services to you (for example, the preparation of income tax returns), to any other third party where you have consented to such disclosure or to a third party where such disclosure is required or permitted by our regulators or by law (for example, to comply with Anti-Money Laundering statutes). We may also, from time to time, be requested to disclose information to securities regulatory and securities oversight organizations to which we are subject for the purposes of an audit or investigation relating to specific accounts or our business generally. Also, we may disclose your personal information if we believe, in good faith, that disclosure is necessary or advisable to protect our interests. We will not disclose your personal information to any third party for the purpose of enabling them to market their products or services to you without first seeking your express consent to do so.

How we protect personal information

In order to protect your personal information, we will not collect, use or disclose your personal information for any purpose other than those identified above, except with your further consent. We maintain security standards and procedures to help prevent unauthorized access to personal information. Our security standards and procedures are updated and tested from time to time to improve the protection of personal information and to assure the integrity of your personal information. We take appropriate measures to enforce employee privacy responsibilities. Our suppliers and agents are bound to maintain your confidentiality and may not use the information for any unauthorized purpose. When we provide information in response to a legal or regulatory inquiry or order, we ensure that the order is valid and we disclose only the information that is required, otherwise we will seek your consent prior to disclosing any information.

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. The length of time we retain information varies depending on the product or service and the nature of the information. This period may extend beyond the end of your relationship with us but only for so long as it is necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your personal information is no longer needed for the purposes explained to you, we have procedures to destroy, delete, erase or convert it to an anonymous form.

We store personal information on our internal servers and/or with our services providers. Our service providers may store and/or process personal information outside of Canada (including in the United States of America).

When information is stored or processed outside of Canada, it may be subject to the laws of and be accessible by legal authorities in such other jurisdictions. We have taken appropriate technical, organizational, and legal steps to secure this information.

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 you can refuse or withdraw your consent at any time. However, in either case, this may limit or eliminate our ability to provide products and services to you and/or to communicate with you. You may also have your name removed from our telephone, mail or email lists. We use these lists to communicate with you and to inform you of relevant information and/or products or services that we think may be of interest to you.

Keeping personal information up to date

We attempt to keep our records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information. If you find any errors in our information about you, let us know and we will make the corrections immediately and make sure they are conveyed to anyone we may have misinformed. If you would like to access the personal information that IAS holds about you, please contact our Privacy Officer at the contact information below.

Website privacy

When visiting the iAS Website, the only information which is collected by us is that which is voluntarily supplied by the visitor. However, our web server does track general information about visitors such as their domain name and time of visit. This information is collected and used to diagnose any problems with our server, to administer our website and to gather demographic information to permit us to evaluate and improve our website. We do not disclose or sell this information to others. We use cookies to store visitors' preferences, record user-specific information on what pages users access or visit, and customize website content based on visitors' browser type and other information that the visitor sends. By communicating with us by email, we may collect, use and disclose that information for the purposes for which it was communicated to us or for purposes otherwise required or permitted by law. That information, like all personal information we gather, will be held only for so long as is necessary for us to provide that service and in compliance with the laws which govern us. We cannot guarantee that links on our website to other websites are secure or the information contained in those sites is accurate. Those sites may have different privacy policies than ours. Visitors should read the linked sites' policies before using them.

Questions or concerns

If you have any questions or concerns about our privacy practices, please contact our Chief Privacy Officer at our Winnipeg office by email at privacy@i-as.ca or by mail at 300-201 Portage Avenue, Winnipeg, Manitoba R3B 3K6. Otherwise, we will operate on the basis that we have your consent to collect, use and disclose your personal information (including personal information that we have previously collected) for the identified purposes and in a manner consistent with this Policy.