KB KENNETH BELL CA
BUSINESS ADVISORY GROUP

KENNETH BELL BUSINESS ADVISORY GROUP PRIVACY POLICY

Introduction

Kenneth Bell CA Professional Corporation collects, uses and discloses personal information in the possession, or under the control, of its clients to the extent required to fulfill its professional responsibilities and operate its business. The firm is committed to maintaining the privacy of personal information provided by its clients and protecting all personal information in its possession or control. This Privacy Policy sets out the principles and procedures that the firm follows in meeting its privacy commitments to its clients and complying with the requirements of federal and provincial privacy legislation.

Principle #1: The firm is accountable for personal information in its possession or control.

- The firm is accountable for all personal information in its possession or control. This includes any personal information that the firm received directly from clients who are individuals, or indirectly, through clients that are organizations (e.g., corporations, government entities, not-for-profit organizations).
- The firm has:
  - policies and procedures aimed at properly protecting personal information;
  - See Principle #7
  - educated its employees regarding its privacy policy and their role and responsibilities in keeping personal information private;
  - All employees have been given a copy of this privacy policy.
  - All employees have been made aware of their responsibility to keep all personal information private and to not discuss any personal information with anyone outside of the office, except the client, without the permission of the client.
  - appointed its Chief Privacy Officer to oversee privacy issues at the firm.
  - The Chief Privacy Officer is Kenneth Bell.
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Principle #2: The firm identifies the purposes for which it collects personal information from clients before it is collected.

- The firm collects personal information from clients and uses and discloses such information, only to provide the professional services that the client has requested. The types of information that may be

collected for this engagement, and the purposes for which it is collected, are set out in Principles 3 and 4 of this privacy statement.

Principle #3: The firm obtains a client's consent before collecting personal information from that client.

- For financial statement engagements, the engagement letter sets out the client's responsibility to obtain any consents required under applicable privacy legislation, for collection, use and disclosure to us of personal information. By signing the engagement letter, the client is formally acknowledging this responsibility.
- For other engagements, such as personal tax returns, valuations, bookkeeping, etc, consent to use the information is implied. However, a notification is sent to the client to ensure the client is aware of the privacy implications.
- Such personal information could include:
    - home/business addresses
    - home/business telephone numbers
    - personal/business identification numbers (e.g., social insurance numbers, credit card numbers, tax numbers)
    - financial information (credit ratings, payroll information, personal indebtedness)
    - personnel information (e.g., employment history, references to criminal records)
    - information linked to the type of client, for example:
    - information related to receipt of welfare or subsidized housing (with respect to various types of not-for-profit and government entities)
    - tenant information (with respect to residential leasing companies).

Principle #4: The firm collects only that personal information required to perform its professional services and operate its business, and such information is collected by fair and lawful means.

- Kenneth Bell and staff involved in engagements need access to some or all of the types of personal information, noted under Principle 3 above, to obtain evidence to support the services they provide. Such personal information will be a significant component of various transactions and events affecting the services provided that will be subjected to confirmation, testing, analyses and such other procedures as the firm considers necessary to perform the services.

Principle #5: The firm uses or discloses personal information only for purposes for which it has consent, or as required by law. The firm retains personal information only as long as necessary to fulfill those purposes.

- As required by professional standards, rules of professional conduct and regulation, the firm documents the work it performs in records, commonly called working paper files. Such files may include personal information obtained from a client.

- Working paper files and other files containing, for example, copies of personal tax returns are retained for 7 years or longer if deemed necessary.

- The personal information collected from a client during the course of a professional service engagement may be:
    - shared with the firm's personnel participating in such engagement;
    - disclosed to employees within the firm to the extent required to assess compliance with applicable professional standards and rules of professional conduct, and the firm's policies, including providing quality control reviews of work performed;
    - provided to members of the organization's audit committee and board of directors,and others in the company that might not otherwise have access to the information,in the course of communicating aspects of the results of our audit; and
    - provided to external professional practice inspectors, who by law, professional regulation, or contract have the right of access to the firm's files for inspection purposes.
- The firm regularly and systematically destroys, erases, or makes anonymous personal information no longer required to fulfill the identified collection purposes, and no longer required by laws and regulations.

Principle #6: The firm endeavours to keep accurate, complete, and up-to-date, personal information in its possession or control, to the extent required to meet the purposes for which it was collected.

- Individual clients are encouraged to contact Kenneth Bell to update their personal information.

Principle #7: The firm protects the privacy of personal information in its possession or control by using security safeguards appropriate to the sensitivity of the information.

- Physical security (e.g., restricted access, locked rooms and filing cabinets) is maintained over personal information stored in hard copy form. Employees are authorized to access personal information based on client assignment and quality control responsibilities.
- Passwords are used to prevent unauthorized access to personal information stored electronically.
- For files and other materials containing personal information entrusted to a third party service provider (e.g., a provider of paper based or electronic file storage), the firm obtains appropriate assurance to affirm that the level of protection of personal information by the third party is equivalent to that of the firm.

Principle #8: The firm is open about the procedures it uses to manage personal information.

- Up-to-date information on the firm's privacy policy can be obtained from Kenneth Bell.

Principle #9: The firm responds on a timely basis to requests from clients about their personal information which the firm possesses or controls.

- Individual clients of the firm have the right to contact Kenneth Bell and obtain access to their personal information. Similarly, authorized officers or employees of organizations that are clients of the firm have the right to contact Kenneth Bell and obtain access to personal information provided by that client. In certain situations, however, the firm may not be able to give clients access to all their personal information. The firm will explain the reasons why access must be denied and any recourse the client may have, except where prohibited by law.

Principle #10: Clients may challenge the firm's compliance with its Privacy Policy.

- The firm has policies and procedures to receive, investigate, and respond to clients' complaints and questions relating to privacy.
- To challenge the firm's compliance with its Privacy Policy, clients are asked to provide an email message or letter to the firm's Privacy Officer (see contact information under principal 1 above). The firm's Privacy Officer will ensure that a complete investigation of a client complaint is undertaken and will report the results of this investigation to the client, in most cases, within 30 days.