



# **Olympia Financial Group Inc. Privacy Policy**

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## Introduction

In order to provide you with services you might request, Olympia Financial Group Inc. and its subsidiaries (collectively, “Olympia” or “we”) needs certain information from you. The information that Olympia may request about you from time to time varies and will depend on the desired service or will otherwise depend on how you would like to interact with us. Olympia is committed to safeguarding and protecting any Personal Information that you may disclose to us.

Olympia recognizes the importance of privacy and the sensitivity of the Personal Information it collects in conducting its business. This privacy policy (the “Policy”) explains how Olympia collects, uses, and discloses your Personal Information in the course of conducting business, or otherwise interacting, with you and applies to Olympia’s own activities and anyone providing services on behalf of Olympia.

## What is Personal Information?

The term “**Personal Information**” refers to any information about an identifiable individual or any information that allows an individual to be identified. Personal Information includes

- Your name, home address, age, personal email, and personal telephone number.
- Your Social Insurance Number.
- Any credit card information you provide.
- Any financial information that you provide or that becomes known to Olympia.
- Your Olympia plan number.
- Any other information that specifically identifies you as an individual.

In general, Personal Information does not include your business contact information, such as your name, title or position, business address, business email address, business telephone or fax number.

## Where do we Collect your Personal Information from?

The term “Personal Information” refers to any information about an identifiable individual or any information that allows an individual to be identified. Personal Information includes

- Your completed Olympia application form.
- Through your interactions with Olympia.
- Other sources such as:
  - Credit reporting agencies (used by Olympia to verify your identity).
  - Professional advisors or authorized representatives.
  - Third-parties used by Olympia to assist us in providing the services which you have requested.

Olympia only collects the Personal Information that is necessary and appropriate for the identified purposes.

## Purposes for the Collection, Use and Disclosure of Personal Information

Olympia collects your Personal Information with your express or reasonably implied knowledge and consent. Olympia uses your Personal Information only for purposes that we have identified prior to the collection of such Personal Information or as may be permitted under applicable law. Olympia will only disclose your Personal Information with your consent, which may be express or reasonably implied, or as may be permitted or required under applicable law. Some of the purposes for which Olympia may collect, use, and disclose your Personal Information are as follows:

- To establish and facilitate communication with you.
- To understand your needs.

- To provide you with services and to respond to any related inquiries.
- To assess your eligibility for services.
- To confirm your application information, if applicable.
- To provide information that may be of interest to you.
- To meet regulatory requirements.
- To advise you of changes to any existing services.

We will not sell, trade, lend or otherwise voluntarily disclose to any third-parties any Personal Information that we have collected, except as provided for in this Policy.

Olympia may disclose your Personal Information to third-parties to assist us in providing services that you have requested and to our professional advisors for legitimate and reasonable purposes.

Olympia may also be required to disclose your Personal Information without your consent:

- To comply with a subpoena or warrant issued or an order made by a court or regulatory with jurisdiction to compel the production of information.
- To investigate a breach or potential breach of applicable law.
- To detect or suppress fraud or to preventing fraud that is likely to be committed.

## **Retention and Disposal of Personal Information**

Under applicable law, Olympia may retain Personal Information only for as long as it reasonably requires that Personal Information for business or legal purposes. Olympia's record retention and destruction policies require the destruction of Personal Information when it is no longer required for business or legal purposes.

All Personal Information received by Olympia in an electronic format may be stored on servers located in Canada or the United States in accordance with this Privacy Policy.

## **Consent**

By submitting your Personal Information to Olympia, you signify your consent to the collection, use and disclosure of your Personal Information in accordance with this Policy.

If you do not consent to the collection, use and disclosure of your Personal Information in accordance with this Policy, please do not provide any Personal Information to us. Please note that certain services can only be offered to you if you provide Personal Information to Olympia, and Olympia may not be able to offer you those services if you choose not to provide us with the required Personal Information. Olympia will not obtain your consent through deceptive or misleading practices.

## **Withdrawal of Consent**

You may withdraw your consent to the use and disclosure of your Personal Information by Olympia. To do so, please contact our Privacy Officer as outlined below. Please note that certain services can only be offered to you if you provide Personal Information to Olympia, and Olympia may not be able to offer you those products or services if you choose not to provide us with the required Personal Information. Additionally, once Olympia has entered into a contract with you, you may not be able withdraw your consent until such time as the obligations under such contract have been fulfilled.

## **Safeguarding Personal Information**

Olympia maintains appropriate safeguards to protect the confidentiality of all Personal Information that it receives. All Personal Information received is held in a secure manner regardless of the format in which it is held. Olympia has comprehensive security controls to protect against unauthorized use, access, alteration, duplication, destruction, disclosure, loss, or theft of Personal Information.

## Access to Personal Information

You may request access to your Personal Information or information about Olympia's collection, use and disclosure of that information by contacting our Privacy Officer, in writing, at the address identified below.

Subject to certain exceptions prescribed by law, you will be given reasonable access to your Personal Information and will be entitled to challenge the accuracy and completeness of that information and, to the extent that you have proven such inaccuracy or incompleteness, have it amended as appropriate. Examples of such exceptions include information that is prohibitively costly to provide, information that contains references to other individuals, and information that cannot be disclosed for legal, security or commercial proprietary reasons.

## Website Privacy

A cookie is a piece of data sent by a website and stored on the user's computer when that website is accessed. Olympia's website collects cookies.

Any third-party sites linked from Olympia's website have their own separate privacy policies. Olympia therefore does not assume any liability or responsibility for the content and activities of these independent sites. You can manage cookies by blocking or disabling third-party cookies in your browser settings.

By using our website, users accept the terms and conditions of this Privacy Policy. Any changes that are made to this policy will be posted to the "Privacy Center" page of Olympia's website.

## Handling of Complaints, Requests and Questions

Olympia has policies and procedures to receive, investigate, and respond to your concerns including questions with respect to this policy. Such concerns or questions should be directed to the Privacy Officer at:

Olympia Financial Group Inc.

4000, 520 – 3rd Ave SW

Calgary, AB

T2P 0R3

E-mail: [privacyofficer@olympiatruster.com](mailto:privacyofficer@olympiatruster.com)

Please note that further documentation or information may be asked to verify your identity.

Privacy concerns will be investigated by Olympia's Privacy Officer, who will determine whether the handling of Personal Information complies with applicable law, and Olympia's policies, protocols, and practices.

The Privacy Officer will make every reasonable effort to investigate and address concerns raised. The individual raising the concern will be informed of any progress or outcome of the investigation within 30 days of submission.

If you are not satisfied with the Privacy Officer's response to your concern or would like further clarification, you may contact the Office of the Information and Privacy Commissioner of the province in which you reside. Individuals are encouraged to raise their concern with Olympia's Privacy Officer before consulting the Privacy Commissioner.

## Policy Review

This policy will be reviewed at least annually by Olympia's Corporate Governance Committee, to ensure that it remains consistent with regulatory requirements, and the overall goals and objectives of Olympia. The Policy may only be changed by the approval of Olympia's Board of Directors.