



NEAL, PALLETT & TOWNSEND

CHARTERED ACCOUNTANTS

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PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND

At Neal, Pallett & Townsend, we are committed to protecting your privacy and safeguarding your personal, business and financial information. We support a general policy of openness about how we collect, use, disclose and protect your personal information.

The purpose of our Privacy Statement is to inform you of Neal, Pallett & Townsend 's practices relating to our collection, use, disclosure and protection of your personal information. By purchasing our professional services and products, you consent to our collection, use, disclosure and protection of your personal information in accordance with specific terms and conditions. The specific terms and conditions are fully disclosed in the following ten principles.

Introduction

Neal, Pallett & Townsend 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.

PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND

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:
 - established and put into effect policies and procedures aimed at properly protecting personal information;
 - educated its partners and employees regarding its privacy policy and their role and responsibilities in keeping personal information private; and
 - appointed its Chief Privacy Officer to oversee privacy issues at the firm.
- If you have any questions about the firm's privacy policies and practices, the firm's Privacy Officer, Mr. David J. Pallett, can be reached by email at dpallett@nptca.com, by phone at 519-432-5534 Ext. 309 and by letter at Neal, Pallett & Townsend, 633 Colborne Street, Suite 300, London, Ontario N6B 2V3.

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 under Principles 3 and 4 of this privacy statement.

**PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND
(CONTINUED)**

Principle #3

The firm obtains a client's consent before collecting personal information from that client.

- The engagement letter to which this privacy statement is attached sets out your 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, you are formally acknowledging this responsibility.

The personal information to which the partner and staff on the engagement will like need to have access could include personal information of customers, suppliers, creditors, debtors employees and others having dealings with the company).

Such personal information could include:

- home addresses
- home telephone numbers
- personal identification numbers (e.g., social insurance numbers, credit card 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 in medical records (with respect to organizations such as hospitals or medical practices)
 - information related to race, religion, sexual preference, receipt of welfare or subsidized housing (with respect to various types of not-for-profit and government entities)
 - source data in claims and in-force databases (with respect to insurance companies)
 - tenant information (with respect to residential leasing companies).

**PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND
(CONTINUED)**

Principle #4

The firm collects only that personal information required to perform its professional services and operate its business, which includes the rendering of accounts for services provided and if required appropriate measures to collect any outstanding account, and such information is collected by fair and lawful means.

- The partners and staff involved in this engagement need access to some or all of the types of personal information, noted under principle 3 above, to obtain evidence to support the firm's opinion on the company's financial statements or to complete such professional services as required under the terms of the engagement for which the firm has been engaged. Such personal information will be a significant component of various transactions and events affecting the financial statements that will be subjected to confirmation, testing, analyses and such other procedures as the firm considers necessary to perform an audit, review engagement, compilation or other engaged services in accordance with the appropriate standards as set out by the Canadian Institute of Chartered Accountants for each engagement.

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, at minimum, for the time period required by law and regulation but more practically for a time period appropriate to appropriately service the clients potential future service requirements.
- *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;*

**PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND
(CONTINUED)**

- *disclosed to partners and 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 (e.g., representatives of the Canadian Public Accountability Board, or a provincial institute of chartered accountants), who by law, professional regulation, or contract have the right of access to the firm's files for inspection purposes.*
- provided to specific individuals or organizations to comply with a validly issued and enforceable subpoena or summons.
- provided to third parties in the event of a prospective purchase, sale, or merger, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so the prospective purchaser or merger partner does not disclose information obtained in the course of the review.
- provided as a part of any actual or threatened legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit and take reasonable precautions to ensure that the information disclosed does not become a matter of public record.
- utilized to provide information to affiliates of the firm and nonaffiliated third parties who perform services or functions for us in conjunction with our services to you, but only if we have a contractual agreement with the other party that prohibits them from disclosing or using the information other than for the purposes for which it was disclosed. (Examples of such disclosures include using an outside service bureau to process tax returns or engaging a records-retention agency to store prior year records).
- 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.

**PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND
(CONTINUED)**

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 the firm's engagement partner in charge of providing service to them 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. Partners and employees are authorized to access personal information based on client assignment and quality control responsibilities.
- Authentication is used to prevent unauthorized access to personal information stored electronically. Encryption is used to prevent unauthorized access to personal information received or sent over the Internet.
- 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 the firm's Privacy Officer (see contact information under principal 1).

**PRIVACY STATEMENT FOR NEAL, PALLETT & TOWNSEND
(CONTINUED)**

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 the engagement partner in charge of providing service to them 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 the engagement partner in charge of providing service to them 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.