

# Privacy Policies and Procedures

## Compliance: Protect the client's privacy and confidentiality

- Naming a compliance officer: Don Xavier at VFG Financial Group

### A written Privacy policies and Procedures including:

- **Receiving and Processing Access requests**

I will always make sure to have the client sign and date the advisor disclosure form which will allow me to communicate with the client about different programs and any relevant information that may pertain to their current policies or updating their policies (as required by PIPEDA).

**Each file will include:** Documented Phone conversations, email correspondence that are dated which will be placed in the file for later review until the Advisor disclosure form is completed and signed by the client. If audited, a compliance officer may have access to these documents which will allow them to understand why the product was chosen and the conversations the client and I had over the phone.

- **Receiving and Responding to inquiries and Complaints:**

Should I, receive an inquiry, or Complaint I will contact VFG Financial Group's Compliance Officer and make sure to document and date the conversation with the client in their personal file and disclose the information to VFG Financial Group's Compliance officer. After reporting the inquiry or incident, I will make sure to handle the inquiry or complaint based on the compliance officer's suggestion(s)

- **Safeguarding Information:**

All my client files are **secured** in a filing cabinet in my home/office and personal information will not be exposed at any time in my office or anywhere else. All files have detailed notes and signed Illustrations, Reason Why Letters and an Advisor Disclosure Agreement and some cases a Confidentiality Agreement or any waiver(s) will be signed. Client Information such as Drivers licence, Social Insurance Numbers, or personal health information, will not be included in this file to avoid exposure of client personal information and breach their personal identity.

When I receive an insurance or investment application from client, once the application has been processed and when it's approved or declined, I will then **remove/block out the following info: Driver's license, SIN, personal health info** to maintain in compliance with the privacy Act, FSRA and E&O.

- **Old Files:**

I understand that I must go through all my old client file and remove personal information such as Drivers licence, Social Insurance Numbers, or personal health information right away.

**Policy breach Procedures:**

Should any of my emails or files be breached, I will immediately contact VFG Financial Group's Compliance Officer Don Xavier and report the information that may has been compromised.

**Email**

When I send an e-mail to a client and I request a response by e-mail, I understand that the exact e-mail address and any information I have included in the e-mail may be exposed. My e-mail address can be used to acknowledge my comments and/or reply to your questions and my communication and client reply will be stored in case we correspond further. I will not sell client e-mail address to anyone. Email over the Internet is generally unencrypted. I take caution and or avoid sending email messages that contain confidential information.

- **Procedures for a regular assessment of the policy program:**

Compliance Officer Don Xavier from VFG Financial Group will audit and review at random twice a year to make sure files are following the compliance rules and regulations according to FSRA guidelines. As such, all documents Old and New will always be following updated FSRA rules and regulations which will apply at the time of review.

**Changes to our Privacy Policy**

I may amend my Privacy Policy from time to time. My website will contain the most current version of the Privacy Policy.

Richard M. Kiernicki  
Senior Financial Advisor