



Privacy Compliance Policy & Procedures

Bonafide Advisory Group Inc.

Group Benefits & Group Retirement

Under Life & Accident and Sickness Insurance Advisory

MANITOBA & ALBERTA

EFFECTIVE JANUARY 1, 2026

ADVOCIS-ALIGNED

Purpose & Scope

Why This Policy Exists

Bonafide Advisory Group recognizes that protecting personal information is a fundamental obligation arising from federal and provincial privacy legislation, insurance regulatory requirements, Advocis and CGIB professional standards, and fiduciary-like duties owed to clients.

This policy establishes formal controls governing the **collection, use, disclosure, retention, safeguarding, and destruction** of personal information.

Who & What This Covers

- All personal and sensitive personal information in Bonafide Advisory Groups' custody or control
- All advisors, employees, contractors, and temporary staff
- All systems, devices, files, and communication channels
- All third parties acting on Bonafide Advisory Groups' behalf

Legislative & Professional Authority

Bonafide's privacy framework is governed by multiple overlapping authorities. Where obligations overlap, the **highest applicable standard** applies.

PIPEDA

Personal Information Protection and Electronic Documents Act — federal baseline standard

Alberta PIPA

Alberta Personal Information Protection Act — provincial requirements for AB operations

Manitoba Privacy Legislation

Applicable provincial privacy rules governing MB operations

Advocis Code of Conduct

Professional duties of confidentiality, integrity, and client protection; Insurance Council market conduct standards

Accountability & Identified Purposes

Organizational Accountability

Privacy compliance is treated as a **risk management and governance function**, not an administrative task. A Designated Privacy Officer is appointed, compliance responsibilities are documented, staff are trained, and breaches and complaints are formally recorded.

Legitimate Collection Purposes

- Assessing insurance and benefits needs
- Underwriting and policy placement
- Policy administration and servicing
- Claims assistance and advocacy
- Plan renewal, maintenance, and reporting
- Legal, regulatory, and professional compliance

Purposes are identified **at or before collection**.



Consent Management & Data Minimization

Express Consent

Required for sensitive information including health, medical, and financial data.

Implied Consent


May apply for routine servicing within an established client relationship.

Withdrawal of Consent

Clients may withdraw consent subject to legal obligations, contractual requirements, and regulatory record-keeping rules. Limitations are documented.

Data Minimization

Bonafide collects only what is reasonably required, uses data strictly for identified purposes, and **does not sell, trade, or monetize** personal information.

 Authorized disclosures are limited to: insurance carriers, third-party administrators, regulators (when legally required), and professional advisors where necessary.

Safeguards

Safeguards are proportionate to the **sensitivity of the information**, consistent with Advocis best practices.



Administrative

- Privacy training and documented procedures
- Confidentiality obligations
- Role-based access controls
- Secure onboarding/offboarding



Technical

- Password-protected systems and devices
- Secure email practices and portals
- Reputable cloud platforms with appropriate safeguards



Physical

- Locked filing systems
- Restricted office access
- Secure document disposal

Retention, Destruction & Accuracy

Retention & Destruction

Records are retained in accordance with insurance regulatory requirements, limitation periods, and professional standards. Retention schedules are reviewed periodically.

Secure destruction methods:

- Cross-cut shredding for physical records
- Secure digital deletion for electronic files

Accuracy Obligations

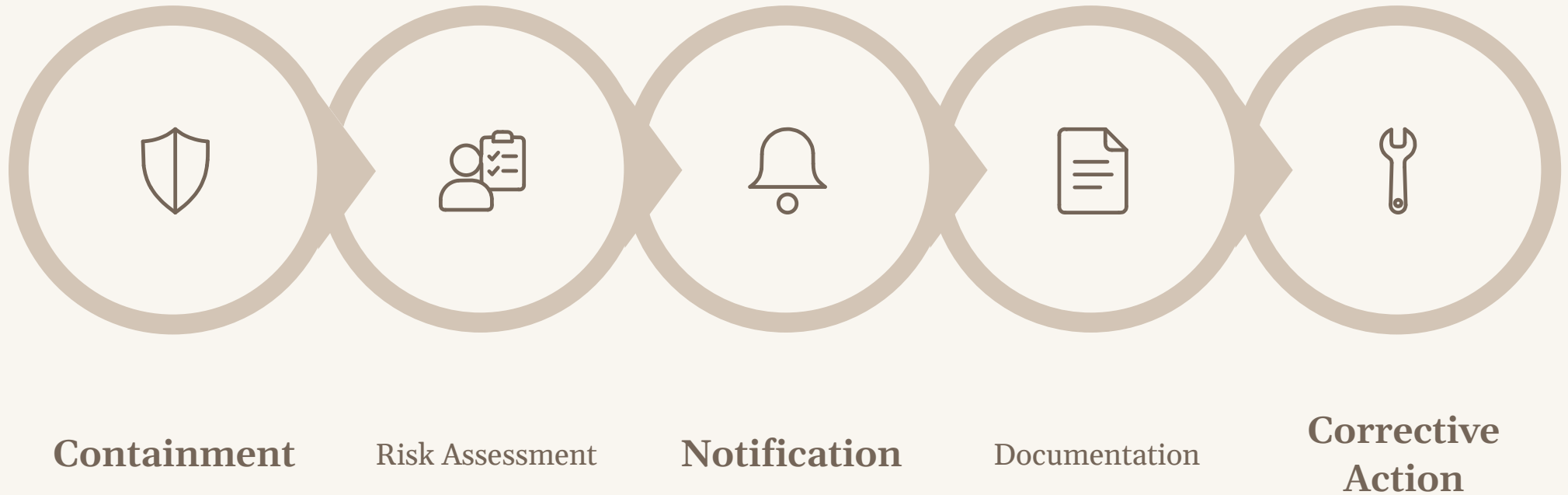
Bonafide takes reasonable steps to ensure personal information is accurate, complete, and up-to-date.

Clients are encouraged to notify Bonafide of any material changes to their information to maintain record integrity.

- ☐ Access requests and correction requests are handled in writing, with responses provided within legislated timelines.

Breach Response Procedure

In the event of a suspected or actual privacy breach, Bonafide follows a mandatory five-step response. All breaches are logged and retained for compliance review.



⚠ Notification obligations extend to affected individuals, relevant regulators, and insurance carriers where required by law.

Third-Party Providers, Complaints & Designated Privacy Officer

Third-Party Oversight

Where personal information is transferred to third parties, Bonafide requires comparable privacy safeguards, limits use to contracted purposes, and enforces confidentiality obligations. **Bonafide remains accountable** for all information under its control.

Complaints & Challenges

Privacy complaints are handled in a fair, timely, and documented manner. Unresolved complaints may be escalated to the appropriate privacy commissioner.

Designated Privacy Officer

Bonafide has appointed a Privacy Officer responsible for:

- Policy oversight and compliance
- Responding to privacy inquiries
- Managing breach response
- Maintaining training and documentation

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Advocis Compliance Alignment

This policy is reviewed **annually**, upon legislative or regulatory change, and upon any material change in business operations. It demonstrates full alignment with Advocis requirements.



Accountability & Governance



Client Confidentiality Controls



Consent Management



Breach Response Procedures



Record Retention Discipline



Third-Party Oversight