









# Asset Allocation Analyst

SOFTWARE FOR FINANCIAL ADVISORS

- **When Permitted or Required by Law:** EquiSoft is compelled to disclose personal information in response to a law, regulation, court order, subpoena, valid demand, search warrant or other legally valid request or enquiry.

We may disclose information to our accountants, auditors, agents and lawyers in:

- **Business Re-organization:** As EquiSoft continues to grow; we may in the future re-organize or streamline parts of our operations. Because our business consists in large measure of our client relationships, we may disclose personal information to a third party in connection with an amalgamation, re-organization, and transfer or financing of parts of our business.

## 5. Where do we keep your information?

EquiSoft records and retains your personal information in electronic, microfilm or paper format at our Head Office location in Montreal, Quebec, Canada.

Your personal information may also be transferred to other off site locations as part of our disaster recovery practices.

## 6. How is your information protected?

The security of your personal information is our top priority. We employ extensive physical, electronic and internal procedural controls to protect your personal data. EquiSoft has comprehensive security standards to guard against unauthorized access to your personal information. For example:

- We require users to identify themselves on the Online "Sign-In Page" before granting access to the software application, this could be a third party's, i.e. as in a back-office provider's sign-on page or EquiSoft's depending on the circumstance;
- We protect your account and log in information using highly secure "firewalls";
- During the logon and authentication process, we send and receive your information in "encrypted" form to ensure maximum security;

[www.AssetAllocationAnalyst.com](http://www.AssetAllocationAnalyst.com)

One Yonge Street, Suite 1801  
Toronto [Ontario] M5E 1W7

T 416.214.6887  
F 416.214.6896

700 Wellington Street, Suite 1400  
Montréal [Québec] H3C 3S4

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F 514.989.3140

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- In the event we receive a court order(s) or legal enquiries, we carefully review the document to confirm they are valid, and we send only the minimum information required. We disclose only the personal information legally required under the terms of the court order or legal enquiry;
- EquiSoft employees ensure all personal information is handled properly and safeguarded adequately.

While we make every attempt to provide the most secure environment for your data, there are a number of things you as a client can do to ensure the protection of your personal data. We encourage you to take every reasonable precaution to safeguard your personal computer from known security threats.

## **7. How is EquiSoft minimizing access to the personal information?**

We do not access personal or financial information for any purpose other than to best serve you and to identify how we can best meet your needs.

We do not ask for more information than we need to meet your needs and our legal requirements.

EquiSoft warrants and guarantees that client data and investment values (hereinafter referred to as “data”) acquired in the context of the use of the Asset Allocation Analyst by the dealer and their advisors is kept strictly confidential for an indefinite period, (or the longest period permitted under law). Unless legally required under operation of law, under no circumstances shall this data be disclosed or disseminated to parties outside of authorized personnel in the execution of their duties at EquiSoft, and related business partner(s) involved in the delivery of such services who at all times will also be party to a similar non-disclosure agreement.

## **8. How does EquiSoft collect, use and protect your personal information received online?**

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- **Visiting our Informational Sites:** When you visit one of our informational websites and navigate through the content provided we learn what pages were visited, what pages were downloaded, the address of the site you visited prior to accessing our site and your Internet protocol address. We only use this information to gather overall site statistics (for example total number of visitors to the site). No attempt is made to identify you as an individual.

Information such as how people are using our site, which sections are of most interest and which pages are visited more frequently assists us in adapting our site to better suit your needs and make accessing information easier. No personal information about you is retained by us.

- **Cookies:** Cookies are small text files that are placed on your computer when you visit a website.

There are two types of cookies currently in use: "session cookies" and "persistent cookies". Session cookies store information only for the duration of your visit to a site. They are not written to the hard drive of your PC but rather are stored in your computer's memory. They do not exist after you have left the site. We currently do not use session cookies in any of our sites.

Persistent cookies are written to your hard drive and remain there until they expire or are deleted by you. We use persistent cookies to store non-sensitive information. We use them to improve our site by tracking general information only (for example which pages are viewed most often). We recommend that you accept cookies while using [www.assetallocationanalyst.com](http://www.assetallocationanalyst.com) if your browser settings prompt you to do so.

Each time you use our software application service, we record your login id when you enter the system and when you leave.

**E-mail** When you send us an e-mail we use that address to respond to your query via e-mail. We will store your e-mail and our reply for future reference should there be further correspondence.

If you have asked us to put you on our e-mail mailing list to provide you with certain information on a regular basis you may ask us to remove you from that list at any time (using the unsubscribe instructions provided with each e-mail).

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Please remember that e-mail sent via the Internet is generally unencrypted and a potential security risk. We will only request that you transmit confidential information over the Internet where the communication is encrypted. You should use caution when forwarding emails and ensure that you do not include confidential information within the body of the messages.

## 9. What privacy rights do you have?

Except in limited circumstances, you may request from us access to your personal information that we hold. You may also question or challenge the accuracy and completeness of this information. We will respond to your request within 30 days.

Please note that we may not be able to provide you with your information in the following circumstances:

- if it contains references to other persons; and
- if the references are subject to legal privilege; and
- if it relates to an investigation of a breach of agreement or law; and
- if it cannot be disclosed for other legal reasons.

You are also permitted to withdraw your consent that allows us to share your personal information in certain circumstances (for example, the sharing of your information with third parties). You may withdraw such consent at any time by contacting us by e-mail or telephone at the address and number noted below. However, your decision to withdraw or revoke your consent may limit the products or services that we are able to provide to you.

## 10. Who do you contact about privacy concerns at EquiSoft?

- EquiSoft has appointed a **Chief Privacy Officer** to handle all privacy issues. If you have any questions, concerns or issues about our Privacy Policy or about confidentiality issues or other issues raised here, you may contact us in writing as follows:

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Attention: Chief Privacy Officer

**By mail**

EquiSoft  
700 Wellington Street Ste. 1400  
Montreal, Quebec  
H3C 3S4

**By e-mail**

info@assetallocationanalyst.com

**Fax**

(514) 989-3140

- You may also contact the **Privacy Commissioner**

The Privacy Commissioner

The Privacy Commissioner of Canada  
112 Kent Street  
Ottawa, Ontario  
K1A 1H3  
Phone: 613 995-8210 or 1-800-282-1376  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

**In Québec:**

La Commission d'accès à l'information  
575, rue Amable, bureau 110  
Québec (Québec)  
G1R 2G4  
Phone: 418 528-7741 or 1-888-528-7741

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