



# SANDPIPER GROUP

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SANDPIPER GROUP



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## **PRIVACY STATEMENT**

### **Privacy Policy**

At Sandpiper Group, we recognize that all personal information is private and confidential and we are committed to protecting your privacy. This Privacy Policy outlines how we handle your personal information to protect your privacy.

### **Privacy Legislation**

Since January 1, 2004, all organizations collecting, using or disclosing personal information in Canada in the course of commercial activities have been required to comply with the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") and any applicable "substantially similar" provincial legislation.

### **Personal Information**

Personal information is defined in PIPEDA as information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. In other words, it does not include the information that one expects to find on a business card (other than an e-mail address which *is considered to be personal information*).

### **Consent to Our Collection, Use and Disclosure of Personal Information**

We collect personal information about you: (i) from subscription or application forms and other information provided by you or your advisor in writing, by telephone, in person, electronically or by other means; (ii) from your activity on the web site and transactional activity in your accounts, including account balances, investments, withdrawals and fees/commissions; (iii) through your advisor, if you have one, and (iv) from other interactions with us, such as discussions with our staff. However, when you subscribe or contact us to consider subscribing for units in the Partnership, we assume that we have your implied consent to our collection, use and disclosure of your personal information for the purposes of providing services to you, your company or organization. However, at times we may ask for your express consent, either verbally or in writing. By providing your personal information to us, you agree that we may collect, use and disclose your personal information as outlined in this Privacy Policy.

### **Withdrawal of Consent**

You may withdraw your consent to our collection, use and disclosure of your personal information at any time, subject to legal and/or contractual restrictions and upon reasonable notice. In some circumstances, legal requirements may prevent you from withholding consent. In addition, your decision to withhold consent may also limit the products and services that we may provide to you and may require you to close your accounts with us.

You can ask us not to send e-mail marketing communications to you by following the opt-out instructions in each communication or you may let us know by contacting us at [admin@sandpipergroup.ca](mailto:admin@sandpipergroup.ca). If you prefer not to be contacted by other means, such as by regular mail or by phone, please provide those instructions to the member of staff or agent with whom you are dealing, or to our Privacy Officer, whose contact information is provided below. Please include your full name, address, telephone number and account number(s) on any correspondence to us.

### **Collection of Personal Information**

Generally we collect your personal information directly from you when you are considering subscribing for units in the Partnership or at the start of or during the course of doing business with you. We may also obtain personal information about you from other sources, such as:

- other individuals within your company or organization, where we are representing the company or organization;
- your insurance company or other financial institution;
- your legal counsel;
- from a government agency or registry; or
- your financial advisor or accountant.

### **Use of Personal Information**

We use your personal information to identify you, to provide services to you, your company or organization,

to issue invoices and to ensure that our records are accurate for third parties and for limited partners holding units in the Partnership.

We may use your personal information to:

- execute your transactions;
- maintain, store, record and determine your account holdings and transaction records;
- verify previously given information;
- provide you and your representatives with account statements, tax receipts, financial statements, proxy mailings, transaction confirmations and any other information that may be requested or needed to service your investment;
- provide you with quality customer service and support;
- protect our interests, including recovering any debts you may owe us; and
- meet legal and regulatory requirements.

#### **Disclosure of Personal Information**

Generally, we do not disclose your personal information to third parties without your consent unless permitted or required by applicable law. There are some situations in which we may disclose your personal information without your consent. For example:

- when we are required or authorized by law to do so, for example if a court issues a subpoena;
- where it is necessary to establish or collect fees; or
- if the information is already on the public record and the disclosure is directly related to the purposes for which it was recorded on the public record.

In some cases, your consent will be implied. If the Sandpiper Group or any part thereof or the Partnership is sold or merged with another entity your consent will be implied to transfer your information to the successor entity in order to continue to provide services to you, unless you tell us otherwise. If we are required to contact our insurers in connection with a claim that you have against us, we will assume that we have your implied consent to the disclosure of your personal information to the insurer.

Lastly, from time to time we may transfer your personal information to the Partnership's or the Sandpiper Group's service providers. Under PIPEDA, a transfer to a service provider is not considered to be a disclosure for which your consent is required; however, we will use contractual or other means to ensure that the third party service provider is bound by obligations regarding privacy that are consistent with this Policy and our obligations under PIPEDA. Examples of transfers to service providers would be situations in which we contract with third parties to provide us with services such as archival file storage or insurance.

#### **Accuracy of Your Personal Information**

It is important that the personal information that we have on file be accurate and up-to-date. If, during the course of the retainer, any of your personal information changes, please inform us so that we can make any necessary changes. We may also ask you from time to time whether your personal information is up-to-date.

#### **Safeguards**

Sandpiper Group uses various administrative and technological safeguards to ensure that your personal information is protected against loss, theft, misuse, unauthorized access, disclosure, copying or alteration. These include: security of our physical premises; security software and firewalls to prevent unauthorized computer access or "hacking"; and internal passwords that restrict access to our electronic files.

#### **Access to your Personal Information**

You have a right to challenge the accuracy and completeness of your personal information and to have it amended, as appropriate. You also have a right to request access to your personal information and receive an accounting of how that information has been used and disclosed, subject to certain exceptions prescribed by law. For example, if the requested information would reveal personal information about another individual, your access may be limited or denied. If your request for access is denied, Sandpiper

Group will notify you in writing of the reason for the denial.

**Website Privacy**

Like most other organizations, we may monitor traffic patterns, site usage and related site information. Our website server will automatically collect IP addresses, and we may use a browser feature called a “cookie” to optimize your visit to our website. You may set your browser to turn cookies off during your use of any website and, in any event, when you close your browser the cookie is deleted. We do not link your IP address or cookies to other personally identifiable information.

By accessing and browsing our website, you agree that we may collect, use and disclose any personal information collected about you through our website as described in this Policy.

**Privacy Officer**

If you have any questions or complaints about this Policy or the handling of your personal information, if you wish to withdraw your consent to our use of your personal information, or to request access to or update any information we have on file, please contact:

Alyssa Barry  
alyssa@sandpipergroup.ca  
604-997-0965

**Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. Any changes will be posted on our website at [www.sandpipergroup.ca](http://www.sandpipergroup.ca) and will be made available upon request through your contact at Sandpiper Group. Please check from time to time to ensure you are aware of our current policy. This Privacy Policy is effective September 1, 2016.