

MD Private Investment Counsel¹ Online Privacy Statement

December 9, 2009

In order to access and use the tools and features made available on the MD Private Investment Counsel Online portal, you are required to enter personal information about yourself. We understand the importance of protecting the privacy of personal information.

Please read this Privacy Statement carefully so that you will understand how your personal information will be treated as you make use of the MD Private Investment Counsel Online portal. By using the MD Private Investment Counsel Online portal, you agree to the terms of this Privacy Statement.

We may update this Privacy Statement without notice. If you don't agree with our new practices, you have the option of closing your account. Our current policy, identified by its effective date, will be posted in the footer of the MD Private Investment Counsel Online portal, and you should check it regularly.

What information we collect

When you first access the MD Private Investment Counsel Online portal you are required to register with a username and password so that we may verify your identity before you access your financial information.

During your session² we will record your computer's internet protocol (IP) address, the user ID you used to log in and where you go while you're on the site.

The purpose of the site is to access and your financial information, in that regard we will collect the financial information you provide to us through your use of the services on the site. This information is not stored on the site itself.

Using your personal information

Your email address is used to communicate with you if you contact us for technical support and to confirm that you have successfully registered to use the features for which you have registered.

We store the Internet Protocol (IP) address of your computer when you access the Service. This information is only used to create broad demographic summaries of where our users come from but our use of the IP addresses does not include identifying who those users actually are. We also use your IP address to help us manage the efficiency of the website.

¹ MD Private Investment Counsel offers investment counselling services, delivered by MD Physician Services Inc., a CMA company.

² A session is the period of time you spend on the website between logging in and logging out.

We also employ session cookie technology to allow us to recognize repeat users and facilitate ongoing access to and use of the site. Generally, cookies work by assigning a unique number to the user that has no meaning outside the assigning site. Cookies do not pose a threat to your files. Most internet browsers allow you to erase cookies from your hard drive, block all cookies or receive a warning before a cookie is used. Please refer to your browser instructions or help screen to learn more about these functions.

Disclosing your personal information

We will never share your personal information without your consent. In the event that we are served with a valid legal requirement such as a subpoena, search warrant or court order that requires us to disclose personal information to a third party, we will make reasonable efforts to notify you unless doing so would violate the legal requirement. We may share aggregated information about users of the MD Private Investment Counsel Online portal with other companies within the MD group of companies³ or to third parties who might assist us in managing and improving our web sites. Aggregated information is information that is combined with information from other users and does not allow you to be identified or contacted.

If all or part of our company is sold, merged or otherwise transferred to another entity, the personal information you have provided at this site may be transferred as part of that transaction. We will take steps to ensure that any personal information that is transferred will not be used or shared in a manner inconsistent with the Privacy Policy under which it was collected unless you provide your consent.

How we protect your information

Data management and maintaining the security and privacy of data is a key process within the MD group of companies' environment and we have built a robust security wall around your personal information. The technologies we use offer numerous layers of protection around the information.

Each user of the MD Private Investment Counsel Online portal has a unique ID known only by him/her. This allows us to verify your identity you when you log into the site and ensure that you are securely connected to your own personal information. We store the IP address and user ID used for every session in a database permanently.

Data is transmitted to our site with a fully secure encrypted connection to our site using Verisign digital certificate technology. This ensures that no unauthorized parties can attempt to capture private data being sent from and to our server over the Internet. We support Secure Socket Layer (SSL) communication using anywhere from 40 bit encryption to 128 bit encryption (the strongest). We recommend using browsers that support full 128 bit encryption for the highest level of security available.

We also utilize state-of-the-art firewall technology to ensure the highest level of protection for your personal information.

³ As of the date of publication, the MD group of companies comprises MD Financial (referring to MD Physician Services Inc., MD Management Limited, MD Private Trust Company, MD Private Investment Management US Inc., MD Life Insurance Company and MD Insurance Agency Limited) and Practice Solutions (including Practice Solutions Software Inc.).

In addition to securing our electronic systems we have procedures in place to maintain physical security at our premises. Backup alternative power supplies the servers for continuous electrical power to all equipment in the event of power interruption. We also provide training to all our employees for compliance with our privacy practices. We limit access to your personal information to only those employees having a reasonable need to access this information to provide the service to you. Employees who misuse information are subject to disciplinary action, including termination.

Although we will make every reasonable effort to protect your personal information from loss, misuse or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. We encourage you to choose a password that is difficult to guess; do not share it with others.

Accessing and Changing Information

Please contact Online Technical Support at 1 (888) 710-4852, or use the form available on the "contact us" section of the site for requests to change data that you are unable to change yourself. In the event that the change is directly related to your accounts please contact your MD advisor.

Returning and deleting information

It is our policy to securely remove all personal information from our systems once it is no longer needed for the purposes for which it was collected. Once you are no longer a client of MD Private Investment Counsel we will keep your personal information available to you for a period of seven years. After that time we will securely destroy or delete all information collected according to our standard. We may be required by law to keep certain information for a longer period.

Contact Us

If you have any questions about this privacy statement or its implementation you may contact us at Privacy-MD@cma.ca. For information on privacy in general, you can also contact the federal privacy commissioner or the privacy commissioner in your province or territory.