

PROTECTING YOUR PRIVACY – OUR ONGOING COMMITMENT

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COMMITMENT TO PRIVACY

Safeguarding your confidentiality and protecting your personal information is fundamental to the way we do business with you. This Online Privacy Policy describes our current information management practices

SCOPE

This Online Privacy Policy describes the practices of MD Financial Management and its subsidiaries (collectively MD¹). The Online Privacy Policy applies to all personal information that has been and will be collected, used and disclosed by MD in the online environment through the websites and other web applications owned or operated by MD. For more information about how we hold and treat your information outside of these please see our Privacy Code also available on this website. In the event of conflict between this Online Privacy Policy and the Privacy Code, the provisions of the Privacy Code prevail.

WHAT IS “PERSONAL INFORMATION”?

“Personal information” is information that refers to you specifically and that reveals a distinctive trait or traits about you that may help others identify you; for example, your date of birth or social insurance number. This Online Privacy Policy does not encompass personal information about you that may be accessed in the public domain; for example, your business address that can be found in public documents such as telephone or professional directories.

HOW WE COLLECT INFORMATION**VISITING OUR INFORMATION SITES**

When you go directly to the information portion of our websites from a link on another website and move from page to page, read pages or download content onto your computer, we learn which pages are visited, what content is downloaded, and the address of websites that you visited immediately before coming to our websites. However, none of this information is associated with you as an individual, and is used only in aggregate.

We use this information to find out how many people visit our websites and which sections of the sites are visited most frequently. This helps us to know what type of information is most useful to you so that we can improve our websites and make it easier for you to access information. We record the statistical information on the numbers of visitors to our websites, but no personal information about you will be kept or used.

USING OUR INTERACTIVE SERVICES

When you register for one of our interactive services, such as mdm.ca portfolio access, the secure messaging service and mydoctor.ca, we compile a profile of you for that service (e.g. name, address, account numbers, login ID, etc.). Each time you use our Internet services, we collect your login ID, information about the transactions that you complete and the informational pages of the website that you visit while using the service. In certain instances we may collect your IP address (which identifies the internet address of the computer you are using) to identify you as a unique user.

We use your profile in responding to your enquiries about selected services. We use your login ID to identify you as a user of the service. We use the transaction information in the aggregate to assess and improve the service. We use specific transaction information for servicing purposes (e.g. trading).

We also use both your transaction information and the informational pages of the website that you have visited to help us determine areas of interest so that we can offer other products and services to you.

For more specific information about a service in particular, please refer to the privacy statement for that service, available on this website.

COOKIES

A cookie is a small file containing text that a website creates when you visit the site. The website sends this file to the browser (the software that allows you to surf the Internet) and saves on your computer. The next time you visit the same website it can recall the cookie so that it knows about you, it "remembers you."

There are two common types of cookies: "session cookies" and "persistent cookies." Session cookies

Session cookies: Session cookies store information only for the lengths of time that you are connected to a website; they are not written onto your hard drive. Once you leave the website, the originator of the cookie no longer has the information that was contained on it.

MD uses session cookies as an additional security feature for our online services. For example, when you login to any of our web services and are authenticated through your login ID and password, a cookie will store the identification number of your browser. Throughout your session, the cookie acts as a type of digital signature to identify your current session to the web server.

We also use session cookies to track your visits within our website. We use that information to determine the type of information that you are looking for in our site and to improve our site. We use information about the site you visited immediately prior to our site to assess the viability of links to our site that we have created on third party sites.

Persistent cookies: The information stored in "persistent cookies" is written onto your hard drive and remains there until the expiry date of the cookie. MD uses persistent cookies to store an encrypted version of your shareholder and account number. This means that the computer applies an algorithm to the number to render it meaningless to third parties in order to maintain confidentiality.

Mdm.ca portfolio access also employs additional "persistent" cookies, designed to deliver a more comfortable experience to you. For example, one is placed onto your computer's hard drive to remember your language preference and ensure you are always presented with the appropriate language. Another may be employed to ensure that any online message to which you have already responded is not presented again each time you login.

EMAIL COMMENTS, QUESTIONS OR RESPONSES

When you send us an email or when you ask us to respond to you by email, we learn your exact email address and any information you have included in the email.

We use your email address to acknowledge your comments and/or reply to your questions. We will store your communication and our reply in case we correspond further with you again at some future date. We will not sell, lease or trade your email address to anyone outside MD. We may add your email address to your centrally stored profile and may use it to send you information about offers relating to our products and services that we believe may be of interest to you.

Please remember email sent over the Internet is generally unencrypted. This means that if it is lost or sent to the wrong person it is easy to open and read. When MD requests that you transmit confidential information over the internet, for instance when filling out a form, we ensure that such transmissions are encrypted. We recommend that you use caution when sending free-format email messages to us and that you do not include confidential information (such as account numbers) in those messages, as they are not encrypted.

RESPONDING TO GAMES, CONTESTS OR SURVEYS

When you submit your answers to a game or contest or submit your response to a survey question, we learn your answer or any opinions or other information that you volunteer.

We will use your submission for the purpose of awarding a prize in a contest. We use your submission to come up with the game or survey results, and we may publish those results in aggregate on our websites. We may use your response to improve our website or other products or services offered by MD. Based on your response, we may forward information about our offers on products and services that we believe may be of interest to you.

HOW WE SAFEGUARD YOUR INFORMATION

Our interactive services use Secure Socket Layer (SSL) and 128 bit encryption technology to enhance security when you visit the secured areas of our Website. SSL is the industry standard tool for protecting and maintaining the security of message transmissions over the Internet. When you access your accounts or send information from secured sites, encryption will scramble your data into an unreadable format to inhibit unauthorized access by others.

To safeguard against unauthorized access to the personal information you have with us, you are required to 'log-on' using a username and password. If you are unable to provide the correct password, you will not be able to access these sections. To protect your online activities, our systems are designed to automatically terminate if extended inactivity is detected. If your session is terminated, you will be required to sign-on again to continue using the service.

If you are required to use a username and password for any reason, you are responsible for maintaining the security and confidentiality of your username and password. MD assumes any person who uses your username and password is you. Keep your username and password in a safe place and do not use computers in public locations where others may monitor your typing. If you suspect that someone has learned either your username or your password, you should immediately change your password.

ADDRESSING YOUR CONCERNS

You have the right to be informed of the collection, use and disclosure of your personal information, and you shall be given access to that information.

You may direct any questions or inquiries you have with respect to this Online Privacy Policy outlined above or about the way we manage your personal information by contacting:

1. your MD Advisor,
2. calling our toll-free attendant in Ottawa at 1 800 267-4022 and asking to speak with an MD Management Trade centre representative,
3. writing to our Chief Privacy Officer at 1870 Alta Vista Dr., Ottawa, ON, K1G 6R7,
4. contacting the Privacy Commissioner of Canada at the website <http://www.privcom.gc.ca> or the Privacy Commissioner in your province or territory.

¹ As of the date of publication, MD refers to MD Financial Management Inc., MD Management Limited, MD Private Trust Company, MD Life Insurance Company, and MD Insurance Agency Limited.