



MD Financial
Management

MD Financial Management Privacy Code Protecting Your Privacy

OUR ONGOING COMMITMENT

COMMITMENT TO PRIVACY

Safeguarding your confidentiality and protecting your personal information are fundamental to the way we do business with you.

SCOPE

This code applies to MD Financial Management Inc., and its subsidiaries.¹ These companies are collectively known as MD Financial Management.

We believe the best way to ensure your information is treated with the respect it deserves is by basing our practices on the 10 interrelated principles that follow. We have developed privacy policies based on these principles, which detail how our financial services and practice management business groups collect, use and disclose your personal information. Where applicable, privacy statements have been developed to provide you with specific information about our information-handling practices in conjunction with specific products and services that you use. These policies and statements are available from your client contact representative, and on our websites.²

This code, the privacy policies and the privacy statements are designed to provide a cohesive and unified framework to guide the information-handling practices of MD Financial Management.

1. ACCOUNTABILITY

An organization is responsible for the personal information under its control, and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

2. IDENTIFYING PURPOSES

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

3. CONSENT

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.

4. LIMITING COLLECTION

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

5. LIMITING USE, DISCLOSURE AND RETENTION

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

6. ACCURACY

Personal information shall be as accurate, complete and up to date as is necessary for the purposes for which it is to be used.

7. SAFEGUARDS

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8. OPENNESS

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

9. INDIVIDUAL ACCESS

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. CHALLENGING COMPLIANCE

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals who are accountable for the organization's compliance.

Policies detailing how MD Financial Management manages personal information that has been and will be collected, used and disclosed are available from your client contact representative, and on our websites.

ADDRESSING YOUR QUESTIONS OR CONCERNS

If you have comments, questions or concerns, you can always contact our Chief Privacy Officer at:

1870 Alta Vista Dr., Ottawa ON K1G 6R7, or
Privacy-MD@md.ca

You can also contact the Privacy Commissioner of Canada via the website: www.privcom.gc.ca

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

² md.ca