



Protecting Your Privacy

Canadians have the right to know and should ask why a business or organization is collecting their personal information and how their information is being used, protected and shared with others.

We at Crystal Wealth fully support the Privacy legislation in Canada and this document outlines why we collect our clients' information and how we protect our clients' privacy.

Code for the Protection of Personal Information

We at Crystal Wealth Management System Limited ("Crystal Wealth" or "we") take the protection of personal information seriously. We have adopted a comprehensive privacy policy that governs why we ask for our clients' information, how we use that information, how we maintain its confidentiality, and how our clients can inquire about their personal information that we maintain.

Any changes to our information handling practices shall be acknowledged in this Code in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so and, if the changes are material, will provide our clients with a revised code. Please refer to our web-site at www.crystalwealth.com to obtain the most recent version of this code.

What is PIPEDA?

Personal Information Protection and Electronic Documents Act (PIPEDA) is the privacy legislation introduced by the Federal Government. It is based on ten principles that form the ground rules for the collection, use and disclosure of personal information. Its purpose is to give individuals greater control over how their personal information is handled by the private sector. PIPEDA, or an equivalent form of provincial legislation, covers virtually all commercial activities within Canada. In accordance with PIPEDA, we are committed to protecting the privacy of clients' information and regard this as an integral part of our service. Crystal Wealth keeps all personal information in strict confidence and controls access to, and use of, such information, based on practices and procedures described in this statement.

What is personal information?

Personal information is any information that identifies an individual. This includes an individual's name, address, age, financial records, social insurance number, credit history, personal e-mail address and home telephone number.

Why do we need personal information?

In our capacity as an Investment Counselor our clients provide us access to such personal information as is necessary for us to provide certain services. Crystal Wealth will ensure such personal information is processed in a protected manner and is used to provide the best possible service to our clients. A client's personal information allows us to:

Establish an investor's identity;
Determine an investor's eligibility and suitability for a product or service;
Protect all parties against errors or fraudulent activity; and
Comply with the law.

In general, a client can choose not to provide us with some or all of their personal information. However, if they make that choice, we may not be able to provide them with the product, service, or information that they requested or that was offered to them.

How do we obtain personal information and the consent to use it?

We obtain information about our clients primarily from our clients directly or through a third party such as a financial planner or securities broker/dealer who has assisted our client with investing in one of our products. Typically, a client's consent is obtained at the time of account opening, either through the application process, by means of verbal consent, or in some form of disclosure document. We may also be required to obtain financially-related information about our clients from other sources with our clients' consent.

How do we use personal information?

Crystal Wealth may use personal information to:

Identify our client;
Ensure our records are accurate;
Establish and administer a client's account(s);
Execute transactions;
Maintain, store, record and determine investor account holdings and transaction records;
Provide investors and their authorized advisors with statements/information;
Provide investors with financial statements, tax receipts, proxy mailings, transaction confirmations and other information that may be requested or needed to service their accounts;
Provide investors with quality customer service and support;
Protect the interests of Crystal Wealth and our clients, in areas such as debt recovery; and
Meet legal and regulatory requirements.

To whom do we disclose personal information?

Crystal Wealth does not sell or disseminate any client's personal information to unrelated third parties.

A client's personal information will only be used for the purposes for which it was collected. Crystal Wealth may share personal information with other parties as required by law and with third parties assisting us in providing services, including investor statement preparation and printing and recordkeeping. Crystal Wealth has legal agreements with such third party providers to ensure the proper handling and protection of personal information. Additionally, we may be required to provide personal information when responding to a search warrant, court order or other legally valid request. We may also disclose personal information to help us collect a debt owed by the client to Crystal Wealth.

How is a client's consent withdrawn?

Clients are able to withdraw consent to use their personal information, as long as:

- they give us at least sixty (60) days written notice;
- there are no legal requirements for the use of the personal information; and
- we can continue to fulfill our contractual obligations to the client.

Consent can be withdrawn by contacting Crystal Wealth's Chief Privacy Compliance Officer as identified below.

Can clients access their personal information?

Individuals have the right to verify the accuracy and completeness of their personal information, and may request that it be amended. We will work with the client to facilitate any request to access and review their personal information held by us. A client who wishes to change or update his or her personal information may do so at any time. Please note that we may not make the change if the changed information is no longer needed to fulfill the stated purpose.

Under certain circumstances, Crystal Wealth may not be able to provide clients with access to specific portions of the information. For example: (i) information containing references to other persons, (ii) information containing proprietary information confidential to Crystal or our clients, (iii) information that has been destroyed or (iv) information that is too costly to retrieve.

Where is personal information kept?

Personal information in our possession may be kept in electronic or paper format in the offices of Crystal Wealth or our third party providers. Personal information may also be kept in secure offsite storage facilities.

How do we protect personal property?

Policies, procedures, guidelines, and safeguards have been put in place at Crystal Wealth to ensure personal information is protected in accordance with Canadian privacy legislation. Security measures including passwords, restricted access to our offices and records, physical access security have been put in place to protect personal information against unauthorized access, theft or misuse.

Our employees and service providers have access to personal information to enable them to perform their duties. Each Crystal Wealth employee is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a code of conduct, which includes comprehensive provisions ensuring the protection of personal information. Any personal information collected from the client will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service or as required by law. Crystal Wealth does not collect any personal information from visitors browsing our web site although personal information may be requested if a visitor chooses to send Crystal Wealth an email message.

QUESTIONS AND CONCERNS

Inquires and complaints received will be reviewed by Crystal Wealth's Chief Compliance Officer and acted upon promptly. Contact information for Crystal Wealth's Chief Compliance Officer is provided below:

Chief Privacy Officer:	Adam Barfoot
Phone:	905-332-4414, ext. 24
Toll Free:	1-877-299-2854
Fax:	905-332-6028
E-Mail:	adamb@crystalwealth.com
Mail:	Crystal Wealth Management System Limited 3385 Harvester Road, Suite 200 Burlington, ON L7N 3N2

We will respond to all questions and concerns in a timely fashion.