

PRIVACY POLICY

CRM2Plus Inc. is a registered company headquartered at 719 Bloor St. West #305 Toronto, Ontario M6G 1L5, and owns and operates <https://retirement-optimizer.ca/>. This Privacy Policy reflects how CRM2Plus Inc., its officers, directors, employees, subsidiaries, agents, assigns, and affiliates, (“CRM2Plus”, “we”, “us”, “our”) collects, uses, retains, stores, discloses, and protects your Personal Information or Sensitive Information, through its online website application (“Application”), to provide financial planners and advisors, or clients thereof (“you”, “yours”, “user”) with standardized financial planning/reporting services (“Services”) in Canada and the United States. Our privacy practices are subject to Canadian privacy law including the [Personal Information Protection and Electronic Documents Act](#) (“PIPEDA”).

CRM2Plus recognizes the importance of transparency regarding our information use, collection, disclosure, retention, and our privacy practices. This Privacy Policy applies to any and all users of any CRM2Plus goods, services, software or applications. This Privacy Policy does not apply to third-party links and plugins available on our website, and users who follow such links are encouraged to read those third-party privacy policies.

We may change this Privacy Policy at any time by posting a new version available on our website. The new version will be effective as of the “**Last Updated**” date below. We will notify you by email if we make material changes to the Privacy Policy and you will have the option to opt-out of our Privacy Policy and Services. We encourage you to check this page occasionally to ensure you are comfortable with our privacy practices.

For the purpose of this Privacy Policy, CRM2Plus is both a data controller and processor the Personal and Sensitive Information, in other words we determine the purpose for processing the information, and we process the information to generate financial reports and provide our Services.

As you read through this Privacy Policy, keep the following in mind:

“**Consent**” means the voluntary, unequivocal, expressed, informed, and unambiguous indication from you stating that you wish agree to the processing of your Personal Information or Sensitive Information.

“**Personal Information**” means any information about a natural person or a ‘data subject’, which can be used to directly or indirectly identify the person. EXAMPLES: name, telephone number, photograph, email address, posts on social media websites, or a computer internet protocol (“IP”) address. Personal Information also includes characteristics, opinions, or other information about/of an individual.

“**Processing**” means any work we do with Personal Information or Sensitive Information, including how we change Personal Information or Sensitive Information into non-personally identifiable information or aggregate information (i.e. pseudonymization). This includes collecting, retaining, using, disclosing, storing, and destroying the information.

“**Sensitive Information**” means any Personal Information or information about or of a natural person or ‘data subject’ relating to health or finance. This includes confidential information financial advisors have obtained from their clients. EXAMPLES: credit card numbers, income, salary, payment information, bank details, and medical records.

“**Third Party**” means a person or organization that is authorized by agreement or contract with CRM2Plus to access and process Personal Information or Sensitive Information.

The terms used in this Privacy Policy have the same meanings as in our Terms of Service. Where there is a conflict of terms, the interpretation and definitions of the Terms of Service shall apply.

WHY WE COLLECT YOUR INFORMATION

CRM2Plus collects and processes Personal Information and Sensitive Information to provide you with our Services and to help us address ancillary issues involving security, authentication and billing. Information, including IP address information, we collect to prevent hacking and fraud, and for diagnostics and data traffic analysis, which ultimately improves our Applications and Services.

Our Services require that we also collect Sensitive Information, namely financial data, to generate financial reports. See below for examples of Sensitive Information we collect.

From time to time, we also engage third party services that collect information to:

- Operate, support, maintain, improve and supply our Services;
- Optimize our website and Application;
- Conduct security checks and verify identities;
- Comply with audit and regulatory purposes;
- Process payments;
- Provide receipts and reports;
- Resolve disputes;
- Collect fees;
- Comply with our legal obligations;
- Correspond with you;
- Troubleshoot problems; and,
- Inform you of security breaches.

Wherever possible we will seek your Consent before collecting your Personal Information. By using our Services, you impliedly agree to the collection and use of Personal Information under this Privacy Policy and in accordance with our Terms of Service.

We will always ask you for Consent before collecting any Sensitive Information, such as financial records.

WHAT INFORMATION WE COLLECT

We only collect information involving our legitimate interests, namely to provide the Services to you through the Application (see above). We do not collect or process Personal Information or Sensitive Information further than what we require for the basic functionalities of our Application.

When you register for a Retirement-Optimizer Account, we collect Personal Information including but not limited to your:

- First name;
- Last name;
- Company information;
- Email; and
- Address (city, province, postal code).

We collect the following Sensitive Information:

- Subscription information;
- Payment information;
- Stripe ID (last four digits of credit card numbers); and
- Financial data, including information related to investments, retirement savings, real property information, requirement plans, and any other information uploaded by you or your clients to our Application.

We do not knowingly collect, process or retain any Personal Information or Sensitive Information from children under the age of majority in their jurisdiction.

HOW WE COLLECT AND STORE INFORMATION

We collect:

- Information that is provided and generated when a user creates his or her Retirement-Optimizer Account. This data is mostly available to the user in their Retirement-Optimizer Account and can be updated in the settings section.
- Information that is provided to us by you when you upload documents to our Application. This includes Sensitive Information such as financial data we use to generate reports. By providing us with Personal or Sensitive Information (including from other persons), you warrant and represent that you have obtained Consent and the legal right and authority to do so. If you have provided us with Personal or Sensitive Information where you did not have legal authority to do so, please contact us immediately at privacy@crm2plus.com.
- Information while assisting users through our customer support Services to investigate and address users' concerns and improve our Services. Information gathered or produced during support of our users is retained for as long as required to ensure that we address concerns in the best way possible.
- Information to communicate with our users about our current and upcoming products, Services, promotions, studies, surveys, news, updates and events.
- Legal records as support for any actual or anticipated legal matter. This includes litigation, pre-litigation, and dispute resolution information or information pertinent to any such claims or disputes.
- Information we find about you available publicly or online through social media outlets and platforms, including Facebook, Twitter, Instagram, LinkedIn, or other websites, etc., through our own social media accounts.

We store Personal and Sensitive Information on third-party servers in a secure data center in Ontario, Canada. We generally retain information throughout the relationship between you and CRM2Plus. Once we no longer need the information for the purpose for which it was collected, we dispose of the information unless otherwise required by law.

HOW WE SHARE INFORMATION

CRM2Plus generally does not share or disclose your Personal or Sensitive Information to others without notifying you unless required by law or otherwise set out in this part. We do share limited information with third party service providers to supply Services to users. We also share information for legal reasons or for corporate transfers.

We engage third party service providers including but not limited to:

- Amazon Web Services [<https://aws.amazon.com/compliance/data-protection/>]
- Google [<https://policies.google.com/privacy?hl=en&gl=ZZ>]
- Stripe [<https://stripe.com/ca/privacy>]

Where we discover better or more efficient options from different third party service providers that match our commitment to privacy and security, we implement such third party services into our Services and Application, and will update this Privacy Policy accordingly.

CRM2Plus also share Personal Information or Sensitive Information:

- For legal reasons or in the event of a dispute. CRM2Plus shares your information if we believe it is required by applicable law, regulation, operation agreement, legal process or governmental request. This includes sharing your information with law enforcement officials, government authorities or other third parties as necessary to enforce our Terms of Service or this Privacy Policy, user agreements or other policies to protect our rights or property or the rights or property of others, or where there is a dispute relating to your use of our Services; and
- Although not anticipated in the near future, if CRM2Plus's business activities are transferred partly or totally to any third party, such third parties will have access to your Personal or Sensitive Information. CRM2Plus would notify you and allow your Personal or Sensitive Information to be transferred to the acquiring third party.

CRM2Plus does not transfer Personal or Sensitive Information to countries where a European Commission adequacy decision has not been rendered. Generally speaking, we do not transfer information to locations outside Canada and the United States.

TO THE EXTENT THAT THE USER CHOOSES TO SHARE HIS OR HER INFORMATION, OR THE INFORMATION OF OTHERS FOR WHICH THE USER HAS OBTAINED THE CONSENT, RIGHT AND AUTHORITY TO PROVIDE, FREELY WITH ANY THIRD PARTY, AND TO THE EXTENT PERMITTED BY APPLICABLE LAW, CRM2PLUS DECLINES ANY LIABILITY FOR INCIDENTS ARISING FROM SUCH SHARING AND VOLUNTARY DISCLOSURE ON THE PART OF THE USER. IF AT ANY TIME YOU OR ANOTHER PERSON OR ENTITY MADE YOUR PERSONAL OR SENSITIVE INFORMATION, OR THE INFORMATION OF OTHERS, FOR WHICH THE CONSENT, RIGHT AND AUTHORITY TO MAKE PUBLICALLY AVAILABLE WAS OBTAINED, YOU ACKNOWLEDGE THAT SUCH PERSONAL OR SENSITIVE INFORMATION MAY BE AVAILABLE ON THE INTERNET AND AROUND THE WORLD. WE CANNOT PREVENT THE USE OR MISUSE OF SUCH PERSONAL OR SENSITIVE INFORMATION BY YOU OR OTHERS.

WHAT RIGHTS YOU HAVE

- You have the right to access and review your Personal or Sensitive Information. Upon request, we will provide you with your information within a reasonable time unless otherwise required by law. If we cannot provide the information to you, we will provide our reasons for denying the request. Generally, we can provide you with one copy of your information free of charge, additional copies shall be subject to an administrative fee.
- You have the right to correct your Personal or Sensitive Information. We endeavor to keep all our records accurate; if we become aware that Personal or Sensitive Information is inaccurate, incomplete or out of date, we will revise the information and we will use reasonable efforts to do so promptly. If your Personal or Sensitive Information was submitted to us by your financial advisor and you wish to correct inaccuracies, you may contact your financial advisor to correct your information through their Retirement-Optimizer Account.
- You have the right at any time to withdraw your Consent. We will endeavor to comply with the withdrawal and adjust our practices regarding your Personal or Sensitive Information within a reasonable time. Withdrawing Consent does not affect the legality of our collection, use, disclosure, and retention of the information before withdrawal. In most cases, if CRM2Plus no longer requires your information for the purposes for which it was collected, then we will dispose of the information.
- You have the right to notify the applicable authorities. If you feel that CRM2Plus has violated your rights, or if you wish to raise a concern with the data protection authorities, please contact the Information and Privacy Commissioner of Ontario (<http://www.ipc.on.ca/>).

- You have the right to ask us not to contact you. If so requested, CRM2Plus will add your contact information to a ‘do not send’ list to comply with your no-contact request.

To exercise any of your rights in this part, please contact privacy@crm2plus.com. CRM2Plus may request information from you when you contact CRM2Plus to verify your identity and to complete the request. Note that some Personal Information or Sensitive Information, identified under What Information We Collect, is necessary for CRM2Plus to supply the Services to you or verify your identity when using our Services.

In most European jurisdictions, data subjects have additional rights to the above listed, including the right to restrict processing, object to processing, data portability (the transfer of the data we have to another organization or to you), and a limited right to erasure (the erasure of your personal data that we have, under certain conditions). CRM2Plus does not knowingly target European data subjects in providing its Services or through the collection, use, disclosure, or retention of Personal or Sensitive Information. If you are a European data subject who has provided your Personal or Sensitive Information to us and are concerned about the way CRM2Plus has dealt with your Personal or Sensitive Information, we encourage you to contact us at privacy@crm2plus.com or seek guidance from a legal professional.

Under California law, California residents may request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. We do not share Sensitive Information with third parties without your Consent. We do not share your Personal Information with unaffiliated third parties for direct marketing purposes without your Consent. If at any time you wish to opt out of having your Personal Information shared with third parties and/or receiving information from CRM2Plus about new products, services, or promotions, you can do so by contacting us at privacy@crm2plus.com.

WEBSITE TRACKING TECHNOLOGIES

CRM2Plus uses tracking technologies like cookies, beacons, tags, scripts and unique codes used in apps. We use this technology for various purposes, including maintenance of user settings and authentication. These technologies are used in analyzing trends, administering the website or Application, tracking users’ movements around the website or Application, and gathering demographic information about our user base.

We collect certain aggregate information using “cookies”. A cookie is a small text file that the website sends to your browser, which then stores the cookie on your hard drive to save you time, provide you with a more meaningful visit, and measure website activity. Different types of cookies include session cookies, persistent cookies, advertising cookies, and analytics cookies. Cookies help us:

- Identify return visitors;
- Apply your individual preferences;
- Determine whether you are logged into the website and Application;
- Prevent fraudulent use of login information;
- Display advertisements that are relevant to you;
- Track the performance of our website and Application; and
- Store information about your cookie preferences.

Cookies generally cannot be used to reveal your identity however Personal Information that we store may be linked to the information contained in and obtained from cookies. Some of our third party service providers likely use cookies as well. You can view their privacy policies using the links provided in under How We Share Information. Many browsers allow you to disable cookie collection, or inform you when a cookie is being stored on your hard drive. Blocking all cookies may affect your use of our website and Application.

From time to time, CRM2Plus employs third party technologies or tools to collect aggregate information on hardware, habits, behaviors and use of our Services. The information collected helps us better adapt our Services to your interests. The information includes, but is not limited to:

- IP Address. An IP address is the unique number that is used by computers on the network to identify your computer every time you log on to the Internet. CRM2Plus tracks such IP addresses for system administration, to report aggregate information, site tracking, security purposes, or to prevent our servers from being abused.
- Operating system. CRM2Plus tracks the OS used to access our Services.
- Browser. CRM2Plus tracks the type of browser used to access our Services.

SECURITY

We maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We also take reasonable steps to assure that third party service providers to whom we transfer any data provide sufficient protection, and we restrict access to only authorized individuals. In addition, we require that our people sign agreements regarding confidentiality and maintaining the security of Personal Information and Sensitive Information. Our security processes include:

- Encryption of data at rest and in transit;
- Advanced two factor authentication;
- Strict filtering rules;
- Brute force detection;
- Secured and monitored facilities;
- Authorization to access the Application is restricted to the development team by secure login; and
- Access to the back-end of the Application is restricted to only certain employees.

We understand that some users may require different levels of security and specific access to CRM2Plus internal control or systems to comply with industry rules, such as the IIROC Rulebook, the MFDA Rules, and OSC or CSA Staff Notices. If in using our Services, you require additional security or other measures to protect Personal Information or Sensitive Information, please contact us at privacy@crm2plus.com. CRM2Plus attempts to maintain practices and policies that are compatible with your privacy obligations. CRM2Plus is open to working with you to help you maintain compliance with applicable industry rules.

DESPITE OUR REASONABLE EFFORTS TO KEEP YOUR PERSONAL AND SENSITIVE INFORMATION SECURE, NO COMPANY CAN GUARANTEE THE COMPLETE SECURITY AND PRIVACY OF ITS SERVICES, INFORMATION AND OTHER DATA. OUR PRIVACY POLICY AND PROCEDURES ARE "AS IS" AND CRM2PLUS MAKES NO REPRESENTATIONS AS TO THE FITNESS FOR A PARTICULAR PURPOSE OR MERCHANTABILITY.

IN THE EVENT OF A SECURITY BREACH AS DEFINED UNDER THE PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT, OR THE UNAUTHORIZED ACCESS OR DISCLOSURE OF PERSONAL OR SENSITIVE INFORMATION UNDER OUR CONTROL WHERE IT IS REASONABLE IN THE CIRCUMSTANCES TO BELIEVE THAT THE BREACH CREATED A REAL RISK OF SIGNIFICANT HARM TO YOU OR THE PERSON TO WHOM THE INFORMATION RELATES, CRM2PLUS WILL ENDEAVOR TO NOTIFY YOU, AND ALL RELEVANT PARTIES INCLUDING THE AUTHORITIES, AS SOON AS FEASIBLE FROM THE TIME WE DISCOVER THE BREACH. CRM2PLUS ENDEAVOURS TO COMPLY WITH APPLICABLE LEGISLATION IN THE PROVINCE OF ONTARIO.

CONTACT INFORMATION

If you have questions or concerns regarding data protection at CRM2Plus, we encourage you to contact our Data Protection Officer at:

Data Protection Officer
CRM2Plus / Retirement-Optimizer
719 Bloor Street West #305
Toronto, Ontario M6G 1L5
Andrew@crm2plus.com
(866) 383-6278

APPROPRIATE AUTHORITY

Should you wish to report a complaint or if you feel that CRM2Plus has not addressed your concerns in a satisfactory manner, you may contact the Information Commissioner's Office or the appropriate governmental authority in your jurisdiction.

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