

## Privacy Policy

It is OTT's policy to respect confidentiality and privacy of individuals who open an account or have a business relationship with OTT. Under the applicable law, OTT has an obligation to collect information from its clients and verify their identity to meet regulatory requirements. This Privacy Policy or Statement sets out the ways OTT managing client information upon receipt of personal information submitted.

In accordance with current federal and applicable provincial legislation in Canada, including the federal privacy law "the Personal Information Privacy and Electronic Documents Act (PIPEDA)", OTT has adopted privacy practices to protect personal information as part of its overall service commitment to its clients, and makes reasonable efforts to keep personal information secure and confidential. Each employee of OTT is required to handle clients' personal information properly and perform duties in compliance with this Privacy Policy.

### **Principles of PIPEDA**

#### **Principle 1 – Accountability**

Each employee of an organization is responsible for personal information under his or her control and designated individual(s) shall be accountable for compliance with its Privacy Policy.

#### **Principle 2 – Identifying Purposes**

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

#### **Principle 3 – Consent**

The prior knowledge and permission of the individual are required for the collection, use or disclosure of personal information, except for legal or security reasons.

#### **Principle 4 – Limiting Collection**

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

#### **Principle 5 – Limiting Use, Disclosure and Retention**

Personal information will not be used, disclosed or retained for purposes other than those stated at the time of collection, except with the permission or consent of the individual, or as permitted or required by law.

#### **Principle 6 – Accuracy**

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

#### **Principle 7 – Safeguarding Information**

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

#### **Principle 8 – Openness**

The policies and procedures of an organization relating to the management of personal information will be made readily available to its clients and employees for specific information.

#### **Principle 9 – Individual Access**

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

## **Principle 10 – Handling Client Complaints and Suggestions**

Individuals can address any complaint regarding compliance with the above principles to the Privacy Officer of an organization.

## **Privacy Practices of OTT**

OTT recognizes an individual's right to privacy and adheres to the above ten principles of PIPEDA when using personal information for legitimate business purposes. The above privacy regulations pertain to all employees or representatives of OTT. Each employee of OTT is required to be responsible for client personal information under his or her control and designated officers are accountable for compliance with this Policy.

Personal information refers to information that can identify an individual, including age, marital status, home address and telephone number, personal email address, employment history, social insurance number, bank account information or credit history etc. Such information may be provided to us on an account application or a business contract signed, or by a phone call, correspondence in mail or email to us, or by use of our website.

## **Why Your Personal Information Is Required**

OTT is required by law to obtain and collect certain personal information about you as a client in order for us to set up and maintain an account or provide services for you. As stated below, such information will allow OTT to carry out its obligations under law and policies regarding client identification and verification, and help establish a relationship with you and provide the best possible service to meet your needs.

- To understand and establish your identity as a client;
- To create a client record or file as required at OTT;
- To understand your needs and assess your eligibility for our services and products;
- To provide you with the services you have agreed to obtain from OTT;
- To maintain business relations and protect you and us from error or any fraud; and
- To comply with all applicable law, regulations and compliance requirements.

## **Obtaining Your Consent**

Your consent is obtained before or at the time opening an account or establishing a relationship with OTT. At such times, you will be required to provide certain personal information in order for us to establish the account or provide you services. The information may be collected via an OTT application form or agreement, in which case you will formally indicate your consent for OTT to collect and use your personal information when you sign the application or agreement. You may wish to withdraw your consent; however, without required information, OTT may not be able to maintain your account or provide you services requested.

## **Purposes of Using Your Personal Information**

After your personal information is provided to OTT's employees or representatives, OTT may use it for the following purposes:

- To identify you as a client and create a Client Record or client information file for you;
- To establish and administer your account, and execute your transactions or services requested;
- To maintain, store, record and determine your account, transactions or services related records;
- To ensure our records about you are accurate, and verify information obtained when necessary;
- To provide you with your account, transactions or services related confirmations or statements, receipts or other information that may be requested or needed to meet your needs;
- To provide you with quality client service and support on your account, transactions or services;
- To maintain our business relationship with you and protect the interests of you and OTT; and

- To meet all applicable legal, regulatory and compliance requirements of OTT, such as the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

When communicating with you for the purposes above, you consent to receive your account, transactions or services related communications from us in any form, including mail, email, or phone call, or Internet.

### **How Personal Information Is Collected and Recorded**

OTT collects personal information from you as a client in a number of ways as stated below. These ways apply to all methods of collecting personal information including hard copy, electronic and verbal means, and the personal information provided by you will only be used for the purposes indicated in the section above.

- Directly from you, when you provide information and sign on OTT's account application or agreement or transaction documents completed and submitted to OTT for services or products you requested.
- Your voluntary disclosure of personal information directly to OTT by phone, mail, email, or our website, and such client account or service related information will be recorded and kept properly.
- By contacting OTT staff or through those you authorized in writing to conduct business on your behalf.

OTT protects your personal information by using appropriate storage, which may be kept in electronic or paper format, and is gathered in a "Client Record". Such record or client file may include information about your name, date of birth, address, phone number, identification, occupation etc. Depending on the type of business or service duties required, OTT may need to keep additional information about your account, transactions or when identified as a necessity during the business process, or as required by applicable law or compliance policy.

During the process of providing services to you, OTT employees are required to obtain accurate, complete and current personal information from you, and keep it updated as is necessary for the identified purposes related to your account, transactions, or services. Such information is required to be provided and updated timely in order for us to provide you with better services and meet our regulatory requirements.

### **Limiting Use, Disclosure and Retention of Personal Information**

Any personal information collected from you will only be used for the purposes identified at the time of collecting and will be retained for as long as is necessary to serve your account, provide services, or retain it for a period as required by applicable law or requirements. If certain information requested is not provided, OTT may not be able to assess your application or needs.

In the course of business activities, all employees of OTT and authorized representatives or service providers are required to protect the confidentiality of client personal information for limited use and stated purposes only. Access to your personal information is restricted to those authorized staff and representatives or service providers who need it to do their jobs. Under no circumstances client personal information will be given or sold to other companies for their own use.

OTT may disclose your personal information to a related third party, business partner or government agency under certain circumstances below. This is done only to meet your service requirements or as may be required by any relevant law or government agencies.

- If a disclosure is connected to the purposes indicated by using service providers authorized, in which case, OTT signs an agreement with it to ensure appropriate controls and protections are in place;
- You have authorized us to do so for services needed by using financial institutions nominated by you;
- It is required by law, government agencies, or legal requests related to your account activities.

### **Protecting and Safeguarding Your Personal Information**

OTT is committed to protecting your personal information in a manner consistent with our privacy practices. In order to ensure client personal information is protected, OTT keeps client information securely in its offices, and requires all its employees to adhere to related policies and procedures during daily work when handling client information, and takes

appropriate security measures to safeguard your personal information. The security measures used include the following:

- Physical access security, restricted access to our offices;
- Passwords set up on our systems;
- Limited access to client records for those staff who need to know for their work;
- File encryption put in place to avoid unauthorized access, modification, or use;
- Requiring authorized third party service providers or business partners to take appropriate measures to secure our client information or remedy it if a breach is occurred;
- Disposing or destroying personal information as required by following procedures to use proper means or safeguards to prevent those unauthorized from gaining access to the information during the process.

### **Right to Access Your Personal Information**

You have the rights to know and ask questions about your personal information after your personal information has been provided to OTT for your account set up, transactions or services signed. The right may include the following:

- Whether we hold any personal information about you;
- How we collect, use or disclose your personal information;
- Whether and how you can see or access that information;
- Accuracy or completeness of your personal information;
- Other questions or issues you may have about your personal information.

You can contact us by phone, fax, mail or email by using the contact information listed below. When requesting access to your information, normally a full access to your information is provided. However, there may be some legal or administrative limitations for certain cases.

You may also request the specific information about our policies and procedures relating to the management of your personal information by reviewing this Policy or contacting us by using the information provided below.

### **Changes to this Privacy Policy**

Our Privacy Policy may change from time to time to reflect changes in our policies, applicable rules, regulations, or related compliance requirements. It is important for you to review this Privacy Statement by visiting our website regularly, as such changes may be made without prior notice.

### **Resolving Your Questions and Concerns**

OTT employees are required to record and maintain the accuracy of your personal information on your file and ensure that it is accurate, complete and up-to-date. However, from time to time, there may be an error occurred. If you find any inaccurate information on your account or transactions, or your personal information has changed, please notify us immediately. We will correct or update it timely.

In addition, if you have any questions, concerns or a complaint about your personal information, please contact us directly by using one of the methods below (If a complaint, please send it in writing). Upon receipt of your request or complaint, we will contact you as soon as possible to ensure that the necessary corrections or changes are made timely, and will act diligently to address your concerns or resolve problems appropriately.

### **Contact Information:**

Tel: 416-512-1878

Fax: 416-512-0169

Email: [privacy@ott.ca](mailto:privacy@ott.ca)

Mail: Suite 510, 5140 Yonge St., North York, ON Canada M2N 6L7