

***McKellar Structured Settlements Inc.'s Policy on the collection, use and disclosure  
of Personal Information ("Privacy Policy")***

This is the Privacy Policy of McKellar Structured Settlements Inc. ("**McKellar**", "**we**", "**us**" and "**our**"), which describes how we process Personal Information. Consistent with our obligations as professionals, we are dedicated to maintaining high standards of confidentiality and security. McKellar follows certain privacy principles to help ensure the confidentiality of the Personal Information we hold. This Privacy Policy informs you of how we collect, use and disclose Personal Information.

***Personal Information***

In this Privacy Policy, "Personal Information" means any information provided to or collected by McKellar about an identifiable individual, or an individual whose identity may be inferred or determined from the information. This Privacy Policy applies regardless of how Personal Information is recorded (for example, electronically, or on paper). This Privacy Policy does not cover any information about more than one individual where the identity of the individuals is not known and cannot be inferred from the information ("Aggregated Information"). McKellar retains the right to use Aggregated Information in any way that it reasonably determines is appropriate. This Privacy Policy also does not apply to information about companies or other legal entities.

***Accountability***

McKellar takes the protection of Personal Information seriously. Our obligations as legal and insurance professionals are governed, in part, by rules of professional conduct which impose duties and obligations regarding the confidentiality of the information provided to McKellar by its clients. We require all professionals, staff, other employees, contractors and agents who provide services in connection with our delivery of legal and other services to our clients to comply with these obligations.

***What information do we collect?***

We may collect Personal Information: (1) for the purpose of determining whether McKellar will enter into a professional relationship; (2) in the course of a professional relationship, or (3) when we otherwise collect Personal Information, for example, when you provide us with information about yourself, or someone else associated with your need for our services. We hold this information in strict confidence and do not reveal it to anyone unless expressly or implicitly authorized by the person or organization concerned or where permitted or required by applicable law.

In the course of our relationship with you, McKellar will need to collect, use, and sometimes disclose different types of Personal Information for various purposes associated with the services we provide as directed by you or your organization. Given the nature of our services, it is

impractical to list all types of Personal Information that may be collected, used or disclosed. However, the Personal Information we collect may include:

- your full name;
- contact information, such as your address, telephone number, e-mail address, or job titles;
- information to help establish your identity;
- information regarding your legal requirements, situation, and interests;
- whether you have subscribed to, or unsubscribed from, any of our mailing lists, or accepted any of our invitations;
- information regarding your organization or other organizations;
- information regarding your preferences, for example, if you attend one of our events and we collect data relating to your dietary needs; and
- any other Personal Information that you voluntarily choose to provide to us.

In some cases, we collect Personal Information from third parties such as clients to whom we provide services, regulatory and legal authorities, other organizations with whom we or you have dealings, such as insurance agencies, law firms, government agencies, information or service providers, and from publicly available records. We may also collect information from public sources related to the services we are providing to one of our clients.

### ***How do we use and disclose Personal Information?***

McKellar uses and discloses Personal Information for the purposes set out in this Privacy Policy. Under no circumstances will McKellar sell any Personal Information it has obtained.

McKellar may use and disclose Personal Information for the following purposes:

- Establishing your identity and compliance with our legal and regulatory obligations. This may require you to provide your name, address, employment/business information, and/or other legally mandated forms of identification;
- Financial: which will include the collection, use and disclosure of names, addresses, banking, and/or financial details;
- Provision and development of services/products which will include any Personal Information necessary to provide the services requested by you or your organization;
- Analytics: we may also use and analyze the Personal Information provided to us to offer you additional services or products, as well as to track and manage your consent preferences, event reservations and any unsubscribe requests. You may, at any time, advise McKellar that you do not wish to receive such information from us;
- Internal record keeping and to analyze and help us manage the provision of our services;
- Answering your questions, and/or providing you with information or materials you have asked to receive;
- To conduct market research;
- Marketing our own services and products to you by email or other means if you have subscribed to one of our mailing lists;
- To keep your information and preferences accurate. For example, from time to time, we may ask you (by email or otherwise) to review your contact details and mailing list preferences and update them as necessary;
- To meet our high quality and professional standards, and to obtain and maintain certification and accreditations which may involve audits of our internal processes;

- To ensure regulatory compliance - for example to erect information barriers to restrict access to certain information;
- To permit us or our clients to pursue available remedies or limit any damages that we or our clients may sustain;
- To detect/help prevent fraud or other illegal activities;
- To meet our insurance requirements;
- To help ensure security and for crime prevention; for example, we may have CCTV cameras installed on our premises and data is captured on cameras for security purposes;
- Any purpose which is permitted or required by applicable law; and
- To carry out any other purpose which is disclosed to you and to which you consent.

The marketing email messages sent by McKellar will give you the opportunity to update your contact details and mailing list preferences or unsubscribe from our mailing lists altogether.

If you no longer wish to receive marketing emails from McKellar, please follow the unsubscribe link in one of our marketing email messages. You may also contact us using the contact information below, and ask us to update your preferences or unsubscribe from any marketing lists.

McKellar allows certain authorized third party providers to track and store certain information about visitors to our websites (including domain names, IP addresses and page views as described below). McKellar may also disclose Personal Information to organizations that perform services for us. Personal Information will only be provided to such organizations if they agree by way of contract to provide appropriate protection for such information.

Personal Information may also be subject to transfer to another organization in the event of corporate transaction such as a merger, or change of ownership. This will occur only if the parties have entered into an agreement under which the collection, use and disclosure of the information is restricted to those purposes that relate to the business transaction, including determining whether or not to proceed with the business transaction, and is used by the parties to carry out and complete the business transaction.

Lastly, we may disclose your Personal Information for any other purpose to which you consent.

### ***Limiting collection, use, disclosure and retention of Personal Information***

McKellar may collect Personal Information in many forms (for example, hard/soft copy, electronically, facsimile, telephone conversations/recordings, email, etc.), but will only do so by lawful means and only for necessary purposes that have been disclosed to you, are described in this Privacy Policy, or are permitted or required by applicable law.

Personal Information collected in any form will only be retained by McKellar so long as it is required: a) for the purpose for which it was collected and those purposes set out in this Privacy Policy; b) to be retained by law; or c) to address any issues that may arise at a later date. When Personal Information is no longer required for these identified purposes, McKellar uses secure procedures to destroy, delete, erase or convert the Personal Information into an anonymous form.

### ***Our websites and cookies***

In general, you can use our websites without giving us any Personal Information. If you are one of our anonymous visitors, please bear in mind that we may still record certain analytical information and as further set out in this section.

McKellar may use cookies, web beacons/pixel tags, log files and other technologies to collect certain information about visitors to our websites, and recipients of our newsletters, invitations and other communications.

When you visit our websites, we may collect information about your visit including your IP address, your geographic region (as determined from IP address), clickstream through our website, the date and time of your visit, information about your device and network such as the browser you use and its configuration, your connection speed, the pages you view or search for on our website, what links you click, what you download, our page response times, any download or other errors, the length of your visit, and whether the emails we send are opened.

We may use this information to improve the functionality of our website, to tailor or improve the content that we may send or show you, and for analytical purposes to understand how visitors interact with our website, messages and the information we provide.

### ***Consent***

Your provision of Personal Information to McKellar means that you agree and consent to our collection, use and disclosure of your Personal Information under this Privacy Policy. If you do not agree with these terms, do not provide any Personal Information to us. However, while providing some Personal Information is optional, certain services can only be offered if you provide Personal Information to us and we may not be able to offer you certain services if you choose not provide us with any required Personal Information.

Consent may be given in different ways such as: a) expressly by signing a document, agreeing through electronic means or verbally; or b) implicitly by providing the Personal Information voluntarily to us directly or through someone acting on your behalf.

There may be circumstances where you have provided Personal Information for one purpose, and McKellar later needs to use that information for a different purpose. In such circumstances, McKellar will seek your consent to use the information for the new purpose unless the law permits or requires us to use the information for that new purpose.

Please note that there are circumstances where the collection, use and/or disclosure of Personal Information may be justified or permitted without consent, or where McKellar may or must disclose information without consent, in accordance with applicable law.

You have the right to revoke your consent to the collection, use and disclosure of your Personal Information at any time. However, revocation of your consent may prevent us from providing services or products to you; in such circumstances, we will discuss with you the reason we need

your Personal Information and why the revocation of your consent affects our ability to provide our services or products to you.

### ***Storage and security***

McKellar has taken steps to maintain physical, procedural and technical security for Personal Information.

McKellar holds Personal Information principally in Guelph, Ontario, and Lasalle, Quebec, and such information may be accessed by those individuals that need to know such information in order that McKellar may provide our services.

Personal Information may be stored outside of the jurisdiction in which you live, if a third party provider or other entity to whom we disclose Personal Information in accordance with this Privacy Policy is located outside of that jurisdiction. In such cases, Personal Information may be subject to the local laws of the jurisdictions within which it is collected, used, disclosed and/or stored, and may be accessed by governmental and law enforcement authorities in those jurisdictions.

### ***Accuracy and access***

McKellar endeavours to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information.

You have a right to request access to your Personal Information and to request a correction to it if you believe it is inaccurate. In the event that you believe that your Personal Information is not accurate or you wish access to your Personal Information, you may make a request using the contact information provided below.

We endeavor to provide timely access to your Personal Information. However, we may require you to verify your identity to our satisfaction prior to doing so. Further, there may be circumstances where access cannot be granted. For example, we will not grant access where doing so would lead to the disclosure of Personal Information of another individual and that individual refuses to provide consent to the disclosure, or where the information is subject to privilege or other legal restrictions. In such cases you will be notified of the reason why it is not possible to grant access to your Personal Information.

### ***Amendment of our practices and this Privacy Policy***

This Privacy Policy is in effect as of February 1, 2020. McKellar will from time to time review and revise its privacy practices and this Privacy Policy. In the event of any amendment, an appropriate notice will be posted on our website.

Your continued access to and/or use of our website or provision of Personal Information to us after any such changes constitutes your acceptance of, and agreement to this Privacy Policy, as

revised. Please periodically review this Privacy Policy so that you know what Personal Information we collect, how we use it, and with whom we may share it.

***Contact us***

If you ever have any questions, complaints or concerns regarding this Privacy Policy, any Personal Information you have submitted to McKellar, or if you would like to:

- access Personal Information that you have already provided so that you can correct or update it, or request that it be deleted, or
- report any violation of this Privacy Policy

you may contact McKellar's Privacy Officer by email at [privacy@mckellar.com](mailto:privacy@mckellar.com), or by mail at:

McKellar Structured Settlements Inc.  
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Suite 100  
Guelph, Ontario  
Canada N1G 4T7  
ATTN: Privacy Officer