

CARTERS PROFESSIONAL CORPORATION PRIVACY POLICY

Carters Professional Corporation takes your privacy seriously. As a law firm, Carters Professional Corporation is committed to protecting the Personal Information of our clients and of visitors to this website (the “Website”) in accordance with our legal and ethical duties. The purpose of this Privacy Policy is to help you understand how Carters Professional Corporation collects, uses, discloses, retains and processes your Personal Information. By providing Personal Information to us, whether through the Website, by email, in person or by any other means, you signify your consent to the terms of this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use this Website or submit any Personal Information to us.

Please read this document carefully.

What is Personal Information?

Personal Information is information about an identifiable individual, including any information about you or that can be used to identify you. For the purposes of this Privacy Policy, Personal Information means any information provided to or collected by Carters Professional Corporation about an identifiable individual and applies regardless of how the information is collected, whether by email, facsimile, hard copy, verbally or any other means.

The Ten Privacy Principles

Whenever we collect, use or disclose your Personal Information, we will comply with the Ten Principles for the Protection of Personal Information, set out in Schedule 1 of Canada’s *Personal Information Protection and Electronic Documents Act*. The Ten Principles are:

1. Accountability:

We are responsible for Personal Information under our control and accountable for our compliance with these principles.

2. Identifying Purposes:

We will identify the purposes for which Personal Information is collected at or before the time the information is collected.

3. Consent:

We will obtain your consent before collecting, using or disclosing Personal Information, except where otherwise required or permitted by law.

Limiting Collection:

We will limit the collection of Personal Information to that which is necessary for the purposes identified. We will collect information by fair and lawful means.

4. Limiting Use, Disclosure and Retention:

We will not use or disclose Personal Information for purposes other than those for which it was collected, except with your consent or as required by law. We will retain Personal Information only as long as necessary for those purposes.

6. Accuracy:

We will take reasonable steps to keep your Personal Information as accurate, complete and up-to-date as is necessary for the purpose for which it is used. Please let us know if any of your information changes so that we can update our files.

7. Safeguards:

We will protect your Personal Information with appropriate security safeguards.

8. Openness:

We will make easily available to you information about our policies and practices relating to the management of Personal Information.

9. Individual Access:

Upon request, we will provide you with access to your Personal Information. You will be able to challenge the accuracy and completeness of your Personal Information and have it corrected as appropriate.

10. Challenging Compliance:

You will be able to challenge or complain about our compliance with these principles.

What Personal Information We Collect:

Carters Professional Corporation collects Personal Information in the course of our normal operations and providing our services. For example, we may collect Personal Information when:

- You access our Website
- You contact us via email, fax, telephone or mail
- You subscribe to our newsletters and publications

- You register for one of our conferences or webinars
- You apply for employment or an articling position
- We provide you with legal services
- You pay your account with us.

We may collect different types of Personal Information in the course of our normal operations, including:

- Contact information such as your name, address, title, business or personal email address, business or personal mailing address and business or personal telephone number
- Billing and financial information, such as your bank account or credit card information
- Background information or identification data such as your date of birth, copies of your driver's license or passport or copies of utility bills
- Personal Information that you provide to us or that is provided to us on your behalf when receiving legal services from us
- Information regarding your organization, including information regarding directors, officers, members or employees
- Website usage and other technical information that is automatically sent to us by your web browser or collected through cookies and other similar technology when you visit our Website
- Your education or employment history, grades and other professional or employment related information that you may provide when applying for a position at Carters Professional Corporation
- Personal Information that you may provide when registering for one of our conferences or webinars or when subscribing for one of our publications such as contact information and dietary or access requirements
- Photographs, videos or other images that you may provide
- Any other Personal Information that you may provide.

How we collect Personal Information

Carters Professional Corporation collects information in different ways, including:

- Direct interactions – you may voluntarily provide us with Personal Information by filling out forms, signing documents, registering to attend one of our conferences, subscribing for our publications or by communicating with us face to face, over the telephone, by mail, by email, by fax, by text, through social media or through other means.

- Automated interactions – when you use our Website we may automatically collect technical data about your equipment and browsing history using cookies and similar technologies.
- From third party sources – when we collect information as part of our client acceptance procedures, or when we receive information about you from third parties such as regulatory bodies, government agencies, recruitment agencies, credit reporting agencies, information or service providers, publicly available records or other professionals or lawyers in connection with the delivery of services to you.

Information collected through the Internet and Cookies

When you visit our Website, we may automatically collect information about you using cookies, server log files and other similar mechanisms. By using the Website, you consent to the use of cookies in accordance with this Privacy Policy.

We collect the following types of information through the internet and cookies:

- your IP address
- your approximate geographic location
- the type of operating system you are using (eg Windows or Mac)
- the type of device you are using
- the type of browser you are using
- your domain name
- which pages you visit on our Website
- the date and time of those requests.

We collect this information to better understand how visitors use our Website, to improve the content of the Website and to improve your interaction with the Website by making it easier for you to get back to the pages you have looked at the next time you visit.

You have choices when it comes to cookies. If you do not want information collected through the use of cookies, you can disable it by changing the setting of your Internet browser. If you disable cookies, you may be unable to access some features on our Website.

The Website may also provide links to third party websites. Clicking on those links may allow third parties to collect or share information about you. We cannot control these third party websites and we are not responsible for the actions or policies of such third parties. You should check the privacy policies of third parties when visiting their websites or when providing any Personal Information to them.

How we use your Personal Information:

The Personal Information we collect is used by Carters Professional Corporation to manage our operations and for various purposes associated with the services we provide. We collect, use, and disclose Personal Information only for purposes that a reasonable person would consider appropriate in the circumstances. The main purposes for which we generally use Personal Information are:

- To provide our legal and other services.
- To conduct and administer our business.
- To perform or carry out the terms of any contract between us.
- To organize, promote and provide conferences, webinars and other educational events.
- To record whether you have subscribed or unsubscribed from any of our mailing lists or publications.
- To process your requests when you register for a conference or subscribe for one of our publications.
- To respond to your inquiries.
- To provide, administer and protect our Website including troubleshooting, data analysis, maintenance and network security.
- To deliver relevant Website content and to respond to requests for information or inquiries from visitors to the Website.
- For marketing and business development purposes, in order to raise awareness of our programs and services and to send out legal updates and invitations to conferences and webinars (with consent under Canada's Anti-Spam Law).
- To monitor the quality of our work and to better understand our clients' needs so that we can improve our services.
- To make appropriate recruitment and hiring decisions.
- To establish and maintain records of Personal Information as required to establish, manage or terminate our relationships with associates, students and employees.
- To disclose or share your Personal Information when required to comply with legal or regulatory requirements.
- To perform client due diligence, identification verification, screening and relevant background checks as may be required or advisable and to identify conflicts of interests.

- To prevent and detect fraud and other crimes such as terrorism financing or money laundering.
- To protect our rights, property or safety or that of our partners, associates, employees, clients or any other person.
- To bill you and to ensure that we are paid, to recover any payments due to us and, where necessary, to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings).
- For other purposes that we tell you about and for which you give us your consent.
- To fulfill other purposes permitted or required by law.

Carters Professional Corporation does not collect more Personal Information than we need to achieve these purposes.

If Carters Professional Corporation has already collected your Personal Information, we will not use that Personal Information for a new purpose without advising you first in writing and obtaining your consent for the new use, unless we are permitted by law to do so.

Who we share your Personal Information with:

We may have to share Personal Information with the parties set out below for the following purposes:

- Service providers, such as those who provide us with IT and system administration services.
- Third parties when it is necessary to do so to provide legal services to you, such as when we engage a consultant or retain another law firm or agent to act or assist us on your behalf or in connection with a transaction with respect to which we are providing you with legal services or advice.
- Third parties such as credit reporting agencies or collection agencies to help us make credit decisions about you or where it is necessary to collect our fees.
- To anyone we reasonably believe is your agent.
- Professional advisors, such as accountants, auditors, bankers and insurers who provide us with accounting, banking and insurance services.
- Government, regulatory authorities, law enforcement, dispute resolution bodies, courts and similar entities to comply with any legal or regulatory obligation, to detect and prevent crimes or to assert or defend legal rights and interests.
- Any persons or entities where we have a legitimate business reason for doing so, such as to manage risk, to process payments to you or to someone on your behalf, to enable another organization to provide you with services or to perform or carry out the terms of any contract between us.

- To other third parties if we have told you about them and you have given us your consent.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements. We require all third party service providers to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions.

Jurisdiction:

Carters Professional Corporation is located in Canada and all of its data is stored on servers located in Canada. If you are in Canada, your Personal Information will not be transferred across national boundaries.

Children and Youth:

Carters Professional Corporation does not collect Personal Information from children under the age of 13 unless we have the consent of their parents or guardians.

We collect the minimum amount of Personal Information of children and youth necessary to achieve our purposes.

If we discover that we have collected Personal Information from a child under the age of 13 without parental consent, we will delete that Personal Information.

Consent:

We only collect, use and disclose Personal Information with the consent of the individual. Your knowledge and consent are required for us to collect, use or disclose your Personal Information, except in certain limited circumstances such as to investigate a crime or to comply with a court order.

Your provision of Personal Information to Carters Professional Corporation means that you agree and consent to our collection, use and disclosure of your Personal Information under this Privacy Policy

You do not have to consent. You have the right to withhold your consent. You should be aware that in many cases, our collection, use, or disclosure of Personal Information is a valid condition of service, which means that we need that Personal Information in order to provide a particular service. In such cases, if you do not wish to consent to the collection, use or disclosure of your Personal Information, we may not be able to do certain things, such as provide you with legal services.

You have the right at any time to withdraw or cancel your consent to the collection, use or disclosure of your Personal Information. Please be aware that withdrawals of consent only take effect from the date of cancellation. They cannot be retroactive. We will let you know if your withdrawal could have any consequences, such as Carters Professional Corporation being unable to provide you with legal services.

Limiting Collection:

Carters Professional Corporation will only collect personal information for the purposes identified in this Policy. If we want to collect information for a different purpose, we will tell you what that purpose is in writing and obtain your consent. We collect Personal Information by fair and lawful means.

We will not collect, use or disclose more Personal Information than is reasonably necessary to meet the identified purposes.

How we protect your Personal Information:

Carters Professional Corporation is committed to protecting your Personal Information by security safeguards appropriate to the sensitivity of the information.

We take all reasonable precautions to protect Personal Information against loss, theft, snooping, hacking or unauthorized collection, disclosure, copying, use or modification.

Our methods of protection include:

- Physical measures - such as areas of restricted access and locked filing cabinets.
- Organizational measures - such as security policies and procedures, employee training on privacy issues, security clearances and limiting access on a "need-to-know" basis.
- Technological measures - such as passwords, encryption, audits as well as strong data security software and systems to protect the Personal Information in Carters Professional Corporation's custody from hackers and malicious intruders.

Although we take reasonable measures to protect your Personal Information, we cannot guarantee the security of any Personal Information transmitted to us.

Carters Professional Corporation makes all employees as well as third party providers aware of the importance of maintaining the privacy and security of Personal Information. We require all third parties to enter into contractual agreements with us that require them to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements.

How long we keep Personal Information:

We keep Personal Information only as long as necessary to achieve the purposes that we have identified to you or to address any issues that may arise at a later date. Our retention periods are based on industry standards, best practices and our business needs. When Personal Information is no longer required, we securely destroy it so that reconstruction is not reasonably possible.

Access, Openness and Accountability:

You have the 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.

If you have any questions about this Privacy Policy, including how to exercise your legal rights, your Personal Information, our compliance with this Privacy Policy or if you would like specific information about how we manage Personal Information, please contact your Carters lawyer or you may contact Terrance S. Carter at:

211 Broadway, PO Box 440
Orangeville, Ontario, Canada
L9W 1K4
Tel: (519) 942-0001
Fax: (519) 942-0300
Toll Free: 1-877-942-0001

Compliance with Canada’s Anti-Spam Legislation

Carters Professional Corporation complies with the requirements of Canada’s Anti-Spam Legislation, as amended from time to time at all times, including when: sending emails or texts from a Carters Professional Corporation account, email address or domain name, obtaining consent from recipients to send emails or texts, managing and responding to requests to unsubscribe and documenting and retaining records of consent. Carters Professional Corporation does not send commercial electronic messages (“CEMs”) to any person unless it has express or implied consent from the recipient, the CEM includes identification and contact information for the sender and the CEM has an unsubscribe mechanism.

Changes to Privacy Policy

We may make changes to this Privacy Policy from time to time, such as in response to developments and changes in privacy law. When we post changes to this Privacy Policy on our Website, we will change the “last updated” date at the top of this Privacy Policy. If possible, we will post notices of significant changes before they take place. We will not reduce your rights under this Privacy Policy without your consent.