

Privacy Policy

Allswealth Inc. (“**Allswealth**”) respects your privacy and wants you to feel secure in your use of this website and Allswealth’s products and services. Allswealth will not collect, use or disclose your personal information other than in compliance with this privacy policy (the “**Policy**”).

The Policy applies to this website (the “**Site**”) and Allswealth’s products and service accessed through the Site. It explains how Allswealth and its affiliates protect, collect, use, and disclose your Personal Information and your right to access that information. “Personal Information” means information about an identifiable individual and includes, without limitation, any personally identifiable information that Allswealth collects when you register for membership, join the Allswealth mailing list, purchase any Allswealth products or services as well as any information that Allswealth gathers about you through the use of “cookies” (as described below).

This Policy does not apply to the practices of companies that Allswealth does not own or control, or to people that Allswealth does not employ or manage, including, without limitation, any business partners.

1. Consent

By using the Site and/or providing Allswealth with your Personal Information, you consent to the collection, use and disclosure of your Personal Information by Allswealth as outlined in this Policy. You acknowledge that your consent is given unambiguously, freely, and for the specific purposes outlined in the Policy. You further agree that when providing consent, you are informed of what is set out in the Policy. You also acknowledge that you provide the Personal Information freely and without any statutory or contractual obligation.

If you do not agree to the Policy, then you may not access the Site or use any services set forth in the Site.

If you do not agree with the terms of this Policy, you should not provide Allswealth with your Personal Information and should immediately discontinue all use of this Site. This Policy is subject to change without notice to you so please check back regularly. Your continued use of this Site will constitute your acceptance of any changes to this Policy.

2. Right to be Forgotten

If at any time you wish to remove your account or permanently erase your historical data stored by us, you may do so by emailing contact@allwealth.com. We will remove all data that we are not required to maintain for taxation, audit, and/or legal reasons.

3. What information do we collect? How do we use this information?

Allswealth collects your Personal Information in order to provide you with the most personalized Site experience possible. Personal Information we collect from you may be used in one of the following ways:

- To personalize your experience - your information helps us to better respond to your individual needs.

- To improve our Site - we continually strive to improve our Site offerings based on the information and feedback we receive from you.
- To improve customer service - your information helps us to more effectively respond to your customer service requests and support needs.
- To send periodic emails - The email address you provide may be used to send you information, notifications that you request about changes to topics or in response to your user name, respond to inquiries, and/or other requests or questions.
- To conduct research - We may use your aggregated or de-identified information to conduct research about our current services or potential new services that may be offered.

Below we have categorized the types of Personal Information we collect and details about how we use it:

a) Membership Information

In order to provide you with a personalized financial plan, you must become a “Member” of Allswealth. As a Member, we ask you to provide to Allswealth your Personal Information and your spouse and your children's Personal Information, if applicable, including: first name, last name, email, province of residence, password, banking information, date of birth, employment status, marital status, income, amount of monthly earnings, current expenses, asset holdings and values, investment objectives, transactional history, account balances/limits, risk tolerance, desired retirement age, life expectancy, desired retirement monthly expenses, (collectively, “**Membership Information**”). Your banking information will be provided to Allswealth in a read-only format through a secure third party platform. Our lawful ground for collecting Membership Information, including Personal Information, is your express consent.

Your Membership Information will be used:

- to provide you with a financial plan including a breakdown of your expenses, asset contributions and recommend investment options tailored to your finances;
- to facilitate, and to communicate with you in connection with Allswealth products or services and to enforce the terms and conditions of this Site and any agreement between you and Allswealth as they relate to the foregoing;
- to assist Allswealth in the customization of your user web interface to suit your preferences;
- for the purposes set out under the headings, “Allswealth Mailing List Information”, and “Customer Information” below, as applicable; and
- for statistical analysis to identify where Members are located to enhance their experience.

b) Allswealth Mailing List Information

When you become a Member of Allswealth, Allswealth will use your Membership Information to include you in, and communicate with you through, the Allswealth mailing list.

In addition to the lawful grounds set out under (“**Membership Information**”), our lawful ground for using your Membership Information for this purpose, including Personal Information, is your existing relationship with Allswealth as a Member..

c) Customer Information

If you purchase any Allswealth products or services for a fee, you will become a “Customer” of Allswealth. As a Customer, you will be required to provide to Allswealth, in addition to your Membership Information, your credit card information and, as applicable, shipping address and telephone number. Your credit card information will be provided by Allswealth to a third party credit card system for processing. While Allswealth will not maintain your credit card information on file after the applicable transaction has been processed, the third party credit card system will use your credit card information to process your initial and any subsequent transactions. Allswealth will take appropriate measures to ensure that any third party to whom Allswealth provides access to your credit card information for processing takes measures to protect the privacy of your Personal Information comparable to the measures set out in this Policy.

Our lawful grounds for collecting and using your Customer Information for these purposes is for: (1) the processing of payments necessary for the performance of a contract with you, to take steps to enter into a contract with you, or to otherwise provide services that you have requested; and (2) our legitimate interests, which in this case are to enable us to properly administer our Site and our business, and to improve customer service.

d) Technical Information

When posting to the Site, we record the IP address that the post originated from. We also may retain server logs which include the IP address of every request to our server.

Our lawful ground for collecting this technical data (e.g., IP addresses and cookies) is our legitimate interests, which in this case are to enable us to properly administer our Site and our business and to improve customer service.

4. How do we protect your information?

The security of your Personal Information is a priority for Allswealth and its employees. Allswealth has adopted appropriate security devices to safeguard your Personal Information when you enter, submit, or access your Personal Information against loss, theft and unauthorized access, disclosure, copying, use and modification. However, please remember that no method of transmitting or storing data is completely secure.

Access to your Personal Information is only given to those who require it to provide our products or services, or where permitted or required by law.

We have procedures in place to deal with a Personal Information breach, should one arise, and will notify you and any applicable regulator of a breach if we are legally required to.

5. What is your data retention policy?

Allswealth will retain your Personal Information only for as long as is necessary to fulfill the purposes for which it is collected and any applicable government and/or legal requirements, subject to this Policy. When your information is no longer required for the purposes set out in the Policy, Allswealth securely destroys it, or deletes your Personal Information from it.

6. Do we use cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow). These cookies enable the site to recognize your browser and, if you have a registered account, associate it with your registered account.

Cookies may store a variety of information, including, without limitation, the number of times that you access this Site, your Membership Information and the number of times that you view a particular page, banner, etc. on this Site. If you do not want to accept cookies, your browser's "help" function should provide you with information on how to block cookies, how to know when you have received cookies and how to disable cookies completely. That said, please be aware that if you do block or disable Allswealth's cookies, you may be unable to take advantage of some of the useful features of this Site.

We use cookies to understand and save your preferences for future visits and compile aggregate data about Site traffic and Site interaction so that we can offer better Site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our Site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

7. Do we disclose any information to outside parties?

We do not sell or trade, or otherwise transfer to outside parties your Personal Information. With respect to transferring data, the foregoing statement does not include trusted third parties who assist us in operating our Site, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

Notwithstanding any other term of this Policy, Allswealth may disclose your Personal Information without your consent where such disclosure is:

- made pursuant to court order or other legal or government compulsion;
- related to an emergency, or to an offence that has been or is about to be committed;
- made for the purpose of collecting a debt owed by you;
- made to Allswealth's lawyers or other advisor in the course of their dealings with Allswealth that is under an obligation to keep the information confidential; or
- made to protect Allswealth's rights or property and/or that of Allswealth's members, customers, sponsors, providers, licensors or merchants.

8. Third Party Links

This Site may, from time to time, provide you with links to additional resources that Allswealth believes will be of interest to you. These links will lead you to websites operated by third parties with their own privacy practices. Allswealth is not responsible for such privacy practices. Accordingly, before accessing any third party to which this Site is linked, you should consider the applicable third party's privacy practices.

Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about these websites.

9. Opting Out

You may also choose not to receive mailing list communications from Allswealth. In that case:

- indicate your desire not to receive any mailing list communications from Allswealth by opting out from the settings page; and/or
- send an email to contact@allswealth.com to be removed from the Allswealth mailing list, as applicable.

10. Legal Rights (“Right to Object” and “Right to Withdraw Consent”)

Under some personal information laws, you may have specific rights in relation to personal information that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

Some of these options may be exercised directly as outlined in the “Opt-Out” section. Alternatively, and to exercise any of the other rights set out above, please email our Privacy Officer (see “Contact Information” section below).

If you are not happy with any aspect of how we collect and use your Personal Information, you also have the right to object to the applicable privacy commission such as the Office of the Privacy Commissioner of Canada and, Office of the Information and Privacy Commissioner of Ontario (IPC) as appropriate. We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

11. Personal Information Located Outside of Canada

Allswealth and its affiliates, and other third parties to whom we disclose information under this Policy may perform activities such as data retention or processing outside of Canada. As a result, your information may be securely used, stored or accessed in other countries and may be subject to the laws of those countries. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in these countries.

12. Data Portability

Allswealth provides the right for anyone whom we have Personal Information of to receive the Personal Information concerning him/her in a commonly used and machine readable format.

13. Changes to our Privacy Policy

If we decide to change our Policy, we will post those changes on this page.

14. Contact Information

Upon request and reasonable notice, Allswealth will provide you with information about your Personal Information held by it. You will be provided with an opportunity to confirm the accuracy and completeness of your Personal Information and to have it amended if necessary.

If you have any questions, comments or concerns regarding this Policy, please contact Allswealth at:

Attention to: Privacy Officer
E-mail: contact@allswealth.com