**PRIVACY POLICY**

McSevney Chaves LLPaccepts the importance of privacy and the sensitivity of personal information. As lawyers we have a professional obligation to hold in strict confidence all information concerning the business and affairs of the client acquired in the course of the professional relationship. We do not divulge any such information unless expressly authorized by the client or required by law to do so. In addition, we are bound by the solicitor-client privilege. This privilege has been defined as follows: “and where there has been no waiver by the client, and no suggestion is made of fraud, crime, evasion, or civil wrong on his part, the client cannot be compelled and the lawyer will not be allowed without the consent of the client, to disclose oral or documentary communications passing between them in professional confidence.”

As of January 1, 2004, all organizations engaged in commercial activities must comply with the ***Personal Information Protection and Electronic Documents Act*** (the “Act”), and the Canadian Standards Association Model Code for the Protection of Personal Information, which is Schedule 1 to the Act (Schedule 1). These obligations extend to lawyers and law firms, including McSevney Chaves LLP. This Act gives you rights concerning the privacy of your personal information over and above the rights you already enjoy as outlined in the preceding paragraph.

The Act requires organizations to implement policies and practices to give effect to your rights under the Act. This document sets out our privacy policy with respect to the collection, protection, use and disclosure of personal information.

***What is personal information?***

In this context, personal information is defined by the Act as any information about an identifiable individual.

***Why does McSevney Chaves LLP need personal information*?**

It is necessary for us to obtain personal information from you for the purpose of determining whether the firm will enter into a professional relationship with you and if such professional relationship comes into existence, in order to enable us to properly and adequately represent you. Without personal information from you, we will not be able to properly and adequately represent you and indeed must decline to do so.

***How does McSevney Chaves LLP collect personal information?***

As a general rule, McSevney Chaves LLPcollects personal information directly from you. It may be necessary for us to obtain personal information from other sources, such as:

1. your insurance company;
2. your employer;
3. your physician;
4. your accountant and/or actuary;
5. consumer reporting agency;
6. your real estate agent in a property transaction; or,
7. from a government agency or registry;

***Consent***

McSevney Chaves LLPwill not collect any personal information about you unless and until we first obtain your consent. Subject to very limited exceptions, we will also obtain your consent to disclosure of your personal information.

If you are already a client of the firm, we will have collected personal information from you and used it for the purpose set out in the sub-heading “Use of personal information”. We will obtain your consent with respect to the collection, use, disclosure and retention of such personal information.

If you were, but are no longer, a client of the firm, you will have provided to us personal information. By doing so, you have consented to the collection, use, disclosure and retention of such information.

In most cases we will obtain your written consent, but in some circumstances we may accept oral consent such as one given during the course of a telephone conversation. Sometimes, consent may be implied through your conduct with us.

***Use of personal information***

McSevney Chaves LLPuses your personal information for the following purposes:

1. to provide legal advice and services;
2. to administer our client (time and billing) databases;

c) protecting against fraud and error;

d) communicating with you generally or to ensure your satisfaction;

e) communicating the information to a sub-contractor (or other agents or intermediaries) in the course of a contract for the performance of any of the purposes listed above; and

f) to include you in any direct marketing activities such as information about our services, or about new developments in the law.

***Disclosure of personal information***

The Act provides that McSevney Chaves LLPmay disclose your personal information without your knowledge or consent if the disclosure is:

a) required to comply with a summons or warrant issued or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with rules of court relating to the production of records (subject always to the solicitor and client privilege);

b) made to the government institution mentioned in Section 7 of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act as required by that section;

c) of information that is publicly available;

d) made to a person who needs the information because of an emergency that threatens the life, health or security of an individual and, if the individual whom the information is about is alive, McSevney Chaves LLPwill inform that individual in writing without delay of the disclosure;

e) where it is necessary to establish or collect fees;

f) required by law (subject always to the solicitor and client privilege);

***Retention and destruction of personal information***

By reason of the use that we make of personal information, we keep our client files indefinitely in secure onsite storage. Any documents that are determined to be of no further value are destroyed by shredding. Alternatively, we may send some or the entire client file to our client.

***Electronic transmission of personal information***

McSevney Chaves LLPrecognizes that e-mail is not a secure medium and a party who is not intended to receive the information may access electronic transmission of your personal information or other confidential information. You should be aware of this in the event you communicate with us by e-mail and request, impliedly or explicitly, that we send you by e-mail personal, confidential information or advice.

***Accuracy***

It is important that personal information be accurate and up-to-date. If McSevney Chaves LLPholds personal information about a client that is inaccurate or incomplete or not up-to-date, we will take reasonable steps to correct the information when we are advised of errors.

***Security of personal information***

McSevney Chaves LLPtakes all reasonable precautions to ensure that security safeguards appropriate to the sensitivity of the information shall protect your personal information. The methods of protection include:

a) premises security;

b) deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;

c) internal password and security policies.

***Openness and individual access to personal information***

McSevney Chaves LLPmakes readily available to clients or individuals specific information about its policies and practices relating to the management of personal information. Any client or individual, upon request, shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information subject to certain exceptions. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

***Changes to this Privacy Policy***

Since McSevney Chaves LLPregularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

***Requests for Access***

If a client has any questions, or wishes to access his or her personal information, please write to:

Gordon S. McSevney or Cindy M. Chaves

McSevney Chaves LLP

708 Duke Street at Westminster

Cambridge, Ontario, N3H 3T6

Telephone: 519-653-3217

Fax: 866-891-7016

If anyone feels that we have contravened any provision of the Act or not followed a recommendation set out in Schedule 1, that individual may file a written complaint with the Privacy Commissioner of Canada at 112 Kent Street, Ottawa, Ontario, K1A 1H3.