



The JOHNSTON, JOHNSTON & ASSOC. Privacy Code in Detail

Principle 1 - Accountability

JOHNSTON, JOHNSTON & ASSOC. is responsible for personal information under its control and shall designate one or more persons who are accountable for JOHNSTON, JOHNSTON & ASSOC.'s compliance with the following principles.

1.1 Responsibility for compliance with the provisions of The JOHNSTON, JOHNSTON & ASSOC. Privacy Code rests with the JOHNSTON, JOHNSTON & ASSOC. Privacy Officer who can be reached at 1-250-758-8383 or via djohnston@jjacga.com Other individuals within JOHNSTON, JOHNSTON & ASSOC. may be delegated to act on behalf of The JOHNSTON, JOHNSTON & ASSOC. Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

1.2 JOHNSTON, JOHNSTON & ASSOC. shall make known, upon request, the title of the person or persons designated to oversee JOHNSTON, JOHNSTON & ASSOC.'s compliance with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code.

1.3 JOHNSTON, JOHNSTON & ASSOC. is responsible for personal information in its possession or control. JOHNSTON, JOHNSTON & ASSOC. shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

1.4 JOHNSTON, JOHNSTON & ASSOC. shall implement policies and procedures to give effect to The JOHNSTON, JOHNSTON & ASSOC. Privacy Code, including:

- (a) implementing procedures to protect personal information and to oversee JOHNSTON, JOHNSTON & ASSOC.'s compliance with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code;
- (b) implementing procedures to receive and respond to complaints or inquiries;
- (c) training and communicating to staff about JOHNSTON, JOHNSTON & ASSOC.'s policies and procedures; and
- (d) developing information materials to explain JOHNSTON, JOHNSTON & ASSOC.'s policies and procedures.

Principle 2 - Identifying Purposes for Collection of Personal Information

JOHNSTON, JOHNSTON & ASSOC. shall identify the purposes for which personal information is collected at or before the time the information is collected.

JOHNSTON, JOHNSTON & ASSOC. collects personal information only for the following purposes:

We collect personal information about our individual clients for the purposes of providing



professional advice and services to them. Usually the scope of advice and service is set out in detail in a formal engagement letter with the client.

As part of our client services these purposes include evaluating, monitoring and assessing the tax and accounting requirements of our clients, recommending changes to asset structures, recommending changes to liability provisions and risk management and strategy consultations for items such as tax disputes.

We also collect information about individual shareholders, employees and directors of organization in the course of providing services to our clients. This information is collected as necessary to properly evaluate and plan the structure and activities of these organizations as mandated by our engagement with them. This information is not utilized to review or analyze the personal financial affairs of any of these individuals, unless that is the subject of a separate engagement.

If an individual also is involved in organizations for which we are separately retained to provide services, we will use their personal information for the purpose of coordinating the collective financial affairs of the individual and these organizations, as well as verifying the accuracy and consistency of information relevant to both engagements.

If instructed by you, we will add individual client names and contact details to our client database, in order to allow us to send them materials relating to our general services. If a client prefers that we do not send this type of material they can let us know in writing and their contact details will then not be utilized in this fashion.

Further reference to “identified purposes” mean the purposes identified in this Principle.

2.2 JOHNSTON, JOHNSTON & ASSOC. shall specify orally, electronically or in writing the identified purposes to the client or employee at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within JOHNSTON, JOHNSTON & ASSOC. who can explain the purposes.

2.3 When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the client or employee will be acquired before the information will be used or disclosed for the new purpose.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a client or employee are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual.

3.1 In obtaining consent, JOHNSTON, JOHNSTON & ASSOC. shall use reasonable efforts to ensure that a client or employee is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that



can be reasonably understood by the client or employee.

3.2 Generally, JOHNSTON, JOHNSTON & ASSOC. shall seek consent to use and disclose personal information at the same time it collects the information. However, JOHNSTON, JOHNSTON & ASSOC. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

3.3 JOHNSTON, JOHNSTON & ASSOC. may require clients to consent to the collection, use and/or disclosure of personal information as a condition of the supply of a product or service only if such collection, use and/or disclosure is required to fulfill the explicitly specified, and legitimate identified purposes.

3.4 In determining the appropriate form of consent, JOHNSTON, JOHNSTON & ASSOC. shall take into account the sensitivity of the personal information and the reasonable expectations of its clients and employees.

3.5 The purchase or use of products and services by a client, or the acceptance of employment or benefits by an employee, may constitute implied consent for JOHNSTON, JOHNSTON & ASSOC. to collect, use and disclose personal information for the identified purposes.

3.6 A client or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. clients and employees may contact JOHNSTON, JOHNSTON & ASSOC. for more information regarding the implications of withdrawing consent.

3.7 JOHNSTON, JOHNSTON & ASSOC. may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.

3.8 JOHNSTON, JOHNSTON & ASSOC. may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a contravention of a law.

3.9 JOHNSTON, JOHNSTON & ASSOC. may collect, use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

3.10 JOHNSTON, JOHNSTON & ASSOC. may use or disclose personal information without knowledge or consent to a lawyer representing JOHNSTON, JOHNSTON & ASSOC., to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

Principle 4 - Limiting Collection of Personal Information

JOHNSTON, JOHNSTON & ASSOC. shall limit the collection of personal information to that which is necessary for the purposes identified by JOHNSTON, JOHNSTON & ASSOC. JOHNSTON, JOHNSTON & ASSOC. shall collect personal information by fair and lawful means.



4.1 JOHNSTON, JOHNSTON & ASSOC. collects personal information primarily from its clients or employees.

4.2 JOHNSTON, JOHNSTON & ASSOC. may also collect personal information from other sources including credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

JOHNSTON, JOHNSTON & ASSOC. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. JOHNSTON, JOHNSTON & ASSOC. shall retain personal information only as long as necessary for the fulfillment of those purposes.

5.1 JOHNSTON, JOHNSTON & ASSOC. may disclose a client's personal information to:

- As required by applicable law (court order, investigation of suspected fraud).
- To defend our firm in proceedings arising from statements or opinions issued by us in the course of our engagements.
- To service providers in circumstances where we remain in control of the information (IT outsourcing).
- To professional regulatory bodies, as required by legislation, rules, policies or codes governing our profession.

5.2 JOHNSTON, JOHNSTON & ASSOC. may disclose personal information about its employees to:

We will only collect, use and disclose personal employee information without express consent when it is reasonable for the particular purpose of the establishment, administration, management and termination of the employment relationship. Administration of the employment relationship will include interaction with benefit providers and others in the provision of our employee benefit plans.

We will disclose personal employee information without the individual's consent to another organization in responding to a request for a reference only when you have provided specific consent for this to occur.

Personal information of employees can also be collected, used and disclosed without the individual's consent where required or permitted by applicable law.

In other circumstances, the consent of the employee will be required for any use or disclosure of their personal information.

5.3 Only JOHNSTON, JOHNSTON & ASSOC.'s employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about clients and employees.

5.4 JOHNSTON, JOHNSTON & ASSOC. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a



client or employee, JOHNSTON, JOHNSTON & ASSOC. shall retain, for a period of time that is reasonably sufficient to allow for access by the client or employee, either the actual information or the rationale for making the decision.

5.5 JOHNSTON, JOHNSTON & ASSOC. shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

6.1 Personal information used by JOHNSTON, JOHNSTON & ASSOC. shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a client or employee.

- JOHNSTON, JOHNSTON & ASSOC. shall update personal information about clients and employees as necessary to fulfill the identified purposes or upon notification by the individual.

Principle 7 - Security Safeguards

JOHNSTON, JOHNSTON & ASSOC. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

7.1 JOHNSTON, JOHNSTON & ASSOC. shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

7.2 JOHNSTON, JOHNSTON & ASSOC. shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

- All of JOHNSTON, JOHNSTON & ASSOC.'s employees with access to personal information shall be required to respect the confidentiality of that information.

Principle 8 - Openness Concerning Policies and Procedures

JOHNSTON, JOHNSTON & ASSOC. shall make readily available to clients and employees specific information about its policies and procedures relating to the management of personal information.

8.1 JOHNSTON, JOHNSTON & ASSOC. shall make information about its policies and procedures easy to understand, including:



(a) the title and address of the person or persons accountable for JOHNSTON, JOHNSTON & ASSOC.'s compliance with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code and to whom inquiries and/or complaints can be forwarded;

(b) the means of gaining access to personal information held by JOHNSTON, JOHNSTON & ASSOC.;

(c) a description of the type of personal information held by JOHNSTON, JOHNSTON & ASSOC., including a general account of its use; and

(d) a description of what personal information is made available to related organizations (e.g., subsidiaries).

8.2 JOHNSTON, JOHNSTON & ASSOC. shall make available information to help clients and employees exercise control of the collection, use and/or disclosure of their personal information and, where applicable, privacy-enhancing services available from JOHNSTON, JOHNSTON & ASSOC.

Principle 9 - client and Employee Access to Personal Information

Upon request, JOHNSTON, JOHNSTON & ASSOC. shall inform a client or employee of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. A client or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

9.1 Upon request, JOHNSTON, JOHNSTON & ASSOC. shall afford clients and employees a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.

9.2 In certain situations, JOHNSTON, JOHNSTON & ASSOC. may not be able to provide access to all the personal information that it holds about a client or employee. For example, JOHNSTON, JOHNSTON & ASSOC. may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, JOHNSTON, JOHNSTON & ASSOC. may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of the laws of Canada or a province.

9.3 Upon request, JOHNSTON, JOHNSTON & ASSOC. shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, JOHNSTON, JOHNSTON & ASSOC. shall provide a list of third parties to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.

9.4 In order to safeguard personal information, a client or employee may be required to provide



sufficient identification information to permit JOHNSTON, JOHNSTON & ASSOC. to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

9.5 JOHNSTON, JOHNSTON & ASSOC. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, JOHNSTON, JOHNSTON & ASSOC. shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.6 Clients and employees can obtain information or seek access to their individual files by contacting the JOHNSTON, JOHNSTON & ASSOC. Privacy Officer.

Principle 10 - Challenging Compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for JOHNSTON, JOHNSTON & ASSOC.'s compliance with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code.

10.1 JOHNSTON, JOHNSTON & ASSOC. shall maintain procedures for addressing and responding to all inquiries or complaints from its clients and employees regarding JOHNSTON, JOHNSTON & ASSOC.'s handling of personal information.

10.2 JOHNSTON, JOHNSTON & ASSOC. shall inform its clients and employees about the existence of these procedures as well as the availability of complaint procedures.

10.3 The person or persons accountable for compliance with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.

10.4 JOHNSTON, JOHNSTON & ASSOC. shall investigate all complaints concerning compliance with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code. If a complaint is found to be justified, JOHNSTON, JOHNSTON & ASSOC. shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A client or employee shall be informed of the outcome of the investigation regarding his or her complaint.

Additional Information

For more information regarding The JOHNSTON, JOHNSTON & ASSOC. Privacy Code, please contact the JOHNSTON, JOHNSTON & ASSOC. Privacy Officer at 1-250-758-8383 or via djohnston@jjacga.com.

Please visit the Privacy Commissioner of Canada's web site at www.privcom.gc.ca.



THE JOHNSTON, JOHNSTON & ASSOC. PRIVACY PROTECTION PLEDGE

At JOHNSTON, JOHNSTON & ASSOC., we respect your privacy. That is why we have developed The JOHNSTON, JOHNSTON & ASSOC. Privacy Code of which the objective is to specify JOHNSTON, JOHNSTON & ASSOC.'s guidelines for the collection, use and disclosure of your personal information.

The JOHNSTON, JOHNSTON & ASSOC. Privacy Code was developed to comply with the relevant portions of the *Personal Information Protection and Electronic Documents Act* (Canada). We have drafted The JOHNSTON, JOHNSTON & ASSOC. Privacy Code to facilitate our compliance with this new legislation and to demonstrate our commitment to protecting your personal information.

We have also developed The JOHNSTON, JOHNSTON & ASSOC. Privacy Protection Pledge. We want you to understand the purposes for which we collect personal information. We also want to make certain that we have your consent to continue to collect, use and disclose your personal information for those purposes.

The following is a brief synopsis of our privacy practices:

Why do we need to collect your personal information?

If you are a JOHNSTON, JOHNSTON & ASSOC. client, JOHNSTON, JOHNSTON & ASSOC. may have collected some basic information about you. We respect your privacy, which is why we collect personal information only for the following purposes:

We collect personal information about our individual clients for the purposes of providing professional advice and services to them. Usually the scope of advice and service is set out in detail in a formal engagement letter with the client.

As part of our client services these purposes include evaluating, monitoring and assessing the tax and accounting requirements of our clients, recommending changes to asset structures, recommending changes to liability provisions and risk management and strategy consultations for items such as tax disputes.

We also collect information about individual shareholders, employees and directors of organization in the course of providing services to our clients. This information is collected as necessary to properly evaluate and plan the structure and activities of these organizations as mandated by our engagement with them. This information is not utilized to review or analyze the personal financial affairs of any of these individuals, unless that is the subject of a separate engagement.

If an individual also is involved in organizations for which we are separately retained to provide services, we will use their personal information for the purpose of coordinating the collective financial affairs of the individual and these organizations, as well as verifying the accuracy and consistency of information relevant to both engagements.



If instructed by you, we will add individual client names and contact details to our client database, in order to allow us to send them materials relating to our general services. If a client prefers that we do not send this type of material they can let us know in writing and their contact details will then not be utilized in this fashion.

When do we disclose personal information?

There is a variety of circumstances where we may need to disclose personal information about our clients. Generally, we only disclose personal information of our clients as instructed by them. There are, however, a number of exceptions for disclosure that may be made without consent:

As required by applicable law (court order, investigation of suspected fraud).

- To defend our firm in proceedings arising from statements or opinions issued by us in the course of our engagements.
- To service providers in circumstances where we remain in control of the information (IT outsourcing).
- To professional regulatory bodies, as required by legislation, rules, policies or codes governing our profession.

How do we protect your personal information?

In order to protect your personal information, JOHNSTON, JOHNSTON & ASSOC.:

1. will not collect, use or disclose your personal information for any purpose other than those identified above, except with your further consent;
2. will protect your personal information with appropriate security safeguards;
3. will protect the confidentiality of your personal information when dealing with other organizations;
4. will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above; and
5. will honour any request you may make for access to your personal information.

What are your choices?

We would like to have your consent to continue to collect, use and disclose your personal information for the purposes identified above. However, you do have choices and can refuse or withdraw your consent as follows:

1. You may refuse to provide your personal information to us.
2. You may also withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

However, in either case, this may limit our ability to serve you.

If you have any questions or concerns about our personal information management system, please contact the JOHNSTON, JOHNSTON & ASSOC. Privacy Officer at 250-758-8383 or



Johnston·Johnston
& ASSOCIATES LTD.
CERTIFIED GENERAL ACCOUNTANTS

via djohnston@jjacga.com. Otherwise, we will assume that we have your consent to collect, use and disclose your personal information for the purposes identified above and in a manner consistent with The JOHNSTON, JOHNSTON & ASSOC. Privacy Code.

Please visit the Office of the Privacy Commissioner of Canada's web site at www.privcom.gc.ca.

JOHNSTON, JOHNSTON & ASSOCIATES.

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