

## CMA HOLDINGS GROUP OF COMPANIES ONLINE PRIVACY POLICY

**PROTECTING YOUR PRIVACY – OUR ONGOING COMMITMENT**  
 effective December, 2005

### ONLINE PRIVACY POLICY TABLE OF CONTENTS

<b>COMMITMENT TO PRIVACY .....</b>	<b>1</b>
<b>SCOPE.....</b>	<b>1</b>
<b>WHAT IS “PERSONAL INFORMATION”? .....</b>	<b>2</b>
<b>HOW WE COLLECT INFORMATION .....</b>	<b>2</b>
VISITING OUR INFORMATION SITES .....	2
USING OUR INTERNET TRANSACTION SERVICES .....	2
COOKIES .....	3
<i>Session cookies</i> .....	3
<i>Persistent cookies</i> .....	3
EMAIL COMMENTS, QUESTIONS OR RESPONSES .....	4
RESPONDING TO GAMES, CONTESTS OR SURVEYS .....	4
<b>HOW WE SAFEGUARD YOUR INFORMATION .....</b>	<b>4</b>
<b>ADDRESSING YOUR CONCERNS.....</b>	<b>5</b>

### COMMITMENT TO PRIVACY

Safeguarding your confidentiality and protecting your personal information is fundamental to the way we do business with you. This Online Privacy Policy describes our current information management practices and confirms our commitment to comply with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”), and equivalent provincial/territorial legislation, in order to meet your specific needs and expectations as one of our clients.

### SCOPE

This Online Privacy Policy applies to CMA Holdings Incorporated<sup>1</sup> and its subsidiaries (collectively the CMAH group of companies<sup>2</sup>). The Online Privacy Policy applies to all

<sup>1</sup> CMA Holdings Inc. is a wholly owned subsidiary of the Canadian Medical Association.

<sup>2</sup> CMAH group of companies is comprised of the MD Financial Group (MD Financial Group, refers to various CMA Holdings Incorporated companies offering financial planning and an exclusive banking referral services arrangement through MD Management Limited, mutual funds managed by MD Funds Management Inc. and MD Private Trust Company, investment counseling and portfolio management services through MD Private Investment Management Inc., executor and trustee services through MD Private Trust Company and insurance products by MD Life Insurance Company and Lancet Insurance Agency Limited.) and the Practice Solutions

personal information that has been and will be collected, used and disclosed by the CMAH group of companies in the online environment through the websites owned by the CMAH group of companies. For more information about how we hold and treat your information outside of websites owned by the CMAH group of companies please see our Privacy Policy also available on this website. In the event of conflict between this Online Privacy Policy and the Privacy Policy, the provisions of the Privacy Policy shall prevail.

## **WHAT IS “PERSONAL INFORMATION”?**

“Personal information” is information that refers to you specifically and that reveals a distinctive trait or traits about you that may help others identify you; for example, your date of birth or social insurance number. This Online Privacy Policy does not encompass personal information about you that may be accessed in the public domain; for example, your business address that can be found in public documents such as telephone or professional directories.

## **HOW WE COLLECT INFORMATION**

### **Visiting our information sites**

When you go directly to the information portion of our websites from a link on another website and move from page to page, read pages or download content onto your computer, we learn which pages are visited, what content is downloaded, and the address of websites that you visited immediately before coming to our websites. However, none of this information is associated with you as an individual, and is used only in aggregate.

We use this information to find out how many people visit our websites and which sections of the sites are visited most frequently. This helps us to know what type of information is most useful to you so that we can improve our websites and make it easier for you to access information. We record the statistical information on the numbers of visitors to our websites, but no personal information about you will be kept or used.

### **Using our Internet transaction services**

When you register for one of our Internet transaction services, we compile a profile of you for that service (e.g. name, address, account numbers, login ID, etc.). Each time you use our Internet services, we collect your login ID, information about the transactions that you complete and the informational pages of the website that you visit while using the service.

We use your profile in responding to your enquiries about selected services. We use your login ID to identify you as a user of the service. We use the transaction information in the aggregate to assess and improve the service. We use specific transaction information for servicing purposes (e.g. trading).

We also use both your transaction information and the informational pages of the website that you have visited to help us determine areas of interest so that we can offer other products and services to you.

## **Cookies**

A cookie is a small file containing text that a website creates when you visit the site. The website sends this file to the browser (the software that allows you to surf the Internet) and saves on your computer. The next time you visit the same website it can recall the cookie so that it knows about you, it “remembers you.”

There are two common types of cookies: "session cookies" and "persistent cookies."

### Session cookies

Session cookies store information only for the lengths of time that you are connected to a website; they are not written onto your hard drive. Once you leave the website, the originator of the cookie no longer has the information that was contained on it.

The CMAH group of companies uses session cookies as an additional security feature for our online services. For example, when you login to any of our web services and are authenticated through your login ID and password, a cookie will store the identification number of your browser. Throughout your session, the cookie acts as a type of digital signature to identify your current session to the web server.

We also use session cookies to track your visits within our website. We use that information to determine the type of information that you are looking for in our site and to improve our site. We use information about the site you visited immediately prior to our site to assess the viability of links to our site that we have created on third party sites.

### Persistent cookies

The information stored in "persistent cookies" is written onto your hard drive and remains there until the expiry date of the cookie. The CMAH group of companies uses persistent cookies to store an encrypted version of your shareholder and account number. This means that the computer applies an algorithm to the number to render it meaningless to third parties in order to maintain confidentiality.

Mdm.ca portfolio access also employs additional "persistent" cookies, designed to deliver a more comfortable experience to you. For example, one is placed onto your computer's hard drive to remember your language preference and ensure you are always presented with the appropriate language. Another may be employed to ensure that any online message to which you have already responded is not presented again each time you login.

Currently, most browsers do not distinguish between session cookies and persistent cookies. For web services to operate, your browser must be set to accept cookies. If you are concerned about having your browser enabled to accept cookies while you are surfing other websites, we recommend that you enable your browser to notify you when it is receiving a cookie. This gives you the ability of accepting or rejecting any cookie presented by the web server you are visiting. For more information on how to do this please contact the company through which you use the Internet.

### **Email comments, questions or responses**

When you send us an email or when you ask us to respond to you by email, we learn your exact email address and any information you have included in the email.

We use your email address to acknowledge your comments and/or reply to your questions. We will store your communication and our reply in case we correspond further with you again at some future date. We will not sell, lease or trade your email address to anyone outside the CMAH group of companies. We may use your email address to send you information about offers relating to our products and services that we believe may be of interest to you.

Please remember email sent over the Internet is generally unencrypted. This means that if it is lost or sent to the wrong person it is easy to open and read. If the CMAH group of companies requests that you transmit confidential information to us over the Internet when filling out an application online, we ensure that such transmission is encrypted. We recommend that you use caution when sending free-format email messages to us and that you do not include confidential information (such as account numbers) in those messages, as they are not encrypted.

### **Responding to games, contests or surveys**

When you submit your answers to a game or contest or submit your response to a survey question, we learn your answer or any opinions or information that you volunteer.

We will use your submission for the purpose of awarding a prize in a contest. We use your submission to come up with the game or survey results, and we may publish those results in aggregate on our websites. We may use your response to improve our website or other products or services offered by the CMAH group of companies. Based on your response, we may forward information about our offers on products and services that we believe may be of interest to you.

## **HOW WE SAFEGUARD YOUR INFORMATION**

The section of mdm.ca that allows you to trade uses Secure Socket Layer (SSL) and 128 bit encryption technology to enhance security when you visit the secured areas of our Website. SSL is the industry standard tool for protecting and maintaining the security of message transmissions over the Internet. When you access your accounts or send

information from secured sites, encryption will scramble your data into an unreadable format to inhibit unauthorized access by others.

To safeguard against unauthorized access to the investment accounts you have with us, you are required to 'log-on' using a username and password. If you are unable to provide the correct password, you will not be able to access these sections. To protect your Online transaction activities, our systems are designed to automatically terminate if extended inactivity is detected. If your session is terminated, you will be required to sign-on again to continue trading.

### **ADDRESSING YOUR CONCERNS**

*You have the right to be informed of the collection, use and disclosure of your personal information, and you shall be given access to that information.*

You may direct any questions or inquiries you have with respect to this Online Privacy Policy outlined above or about the way we manage your personal information by contacting:

1. your Financial Consultant,
2. calling our toll-free attendant in Ottawa at 1-800-267-4022 and asking to speak with an MD Management TradeCentre representative,
3. if you are a client of Physician Services Group, by calling toll-free at 1-800-361-9151,
4. writing to our Chief Privacy Officer at 1870 Alta Vista Dr., Ottawa, ON, K1G 6R7,
5. contacting the Privacy Commissioner of Canada at the website <http://www.privcom.gc.ca>. or the Privacy Commissioner in your province or territory.