



Sundal International Privacy & Confidentiality of Information

Sundal International respects the privacy rights of our clients, partners and employees and has always been committed to protecting all personal information in our possession or control.

We have adopted our Privacy Policy to guide how we collect, use and disclose the personal information we require in the course of fulfilling our professional responsibilities and operating our business. Certain of the practices discussed reflect requirements set out in both federal and provincial privacy legislation.

Sundal International's policy is to at all times adhere to the requirements of the law and our professional responsibilities, and to be responsive to our clients, partners and employees who expect us to respect their privacy and protect their personal information. Any personal information that is made known or disclosed to Sundal is only the information that would be documented in specific customer compilation, tax or bookkeeping file.

The following describes Sundal's principles regarding privacy and confidentiality of information and further describes the company's responsibilities related to how the company acquires, uses, processes and removes client personal information.

1. Sundal International is accountable for all personal information in our possession or control. This includes any personal information that we receive directly, for example, from individual clients, partners and employees, as well as individuals' personal information that we may receive indirectly, for example, through corporate and government clients. We have established policies and procedures aimed at protecting personal information. We have educated our employees about our Privacy Policy and their role in protecting your personal information.
2. Sundal International will inform you why we are collecting your personal information when the information is collected. For Client Information - In most instances, Sundal International will collect, use or disclose personal information about clients only for the purpose of providing professional services as specified in a duly authorized Professional Services Agreement and includes the details of what information may be required in the execution of specified work. Client personal information may also be disclosed internally
3. Sundal International will collect, use or disclose personal information about you only with your informed consent. The Terms and Conditions of every Sundal International Professional Services Agreement include a descriptive about how Sundal International may use and disclose your personal information. By signing the client's Engagement Letter, the client will be providing its consent to the collection, use and disclosure described in the Terms and Conditions. Sundal International clients always have the option not to provide their consent to the collection, use and distribution of their personal information, or to withdraw their consent at a later stage. Where a client chooses not to provide us with permission to collect, use or disclose personal information, we may not have sufficient information to continue providing the client with our services.
4. Sundal International limits the amount and type of personal information we collect and we limit the collection of personal information to that which is reasonably required to provide our services or operate our business.
5. Sundal International will use and disclose your personal information only for the purposes for which we have your consent. We will keep personal information only as long as necessary to accomplish these purposes. If Sundal International intends to use personal information for any purpose not previously identified to the individual, we will obtain their prior consent. However, Sundal International may use personal information without consent for the purpose of acting in respect of an emergency that threatens the life, health or security of an individual, including steps taken under our pandemic policies, or as otherwise permitted by law including for purposes of an investigation. We may also disclose personal information without consent as permitted or required by applicable federal and provincial privacy laws, including:

- a) To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction or to comply with rules of conduct required by regulatory bodies.
- b) To a government institution that has requested the information, identified its lawful authority, and indicates that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial or foreign law; or suspects that the information relates to national security or the conduct of international affairs; or is for the purpose of administering any federal or provincial law
- c) To an investigative body or government institution on our initiative when we believe the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or we suspect the information relates to national security or the conduct of international affairs.

6. In order to provide clients with a professional level of service, Sundal International will rely on the accuracy of the personal information in our possession or provided to us in and for the execution of our services. Clients are encouraged to advise us of any changes to personal information that may be relevant to the services we are providing.

7. Sundal International protects personal information with safeguards appropriate to the sensitivity of the information. We protect personal information by using physically secure facilities, industry standard security tools and practices, and clearly defined internal policies and practices. Security measures are in place to protect the loss, misuse and alteration of the personal information under our control. Personal information is stored in secure environments (e.g., restricted access premises, locked rooms and filing cabinets). To prevent unauthorized electronic access to personal information, any information that is stored in electronic form is protected in a secure electronic and physical environment. We are responsible for all personal information transferred and temporarily positioned on our Canadian servers for processing and monitor that systems meet legal requirements under applicable Canadian federal and provincial privacy legislation.

8. With each client contracting Sundal International for professional services, the company is open about the procedures used to manage your personal information. The most up-to-date version of our privacy policy is available in its entirety at www.sunfalintl.com.

9. At their request, Sundal International will advise individuals of what personal information we have in our possession or control about them, what it is being used for, and to whom and why it has been disclosed. Clients have the right to review and obtain a copy of their personal information on record in our individual offices by contacting their engagement partner. Partners and employees have the right to review and obtain copies of their personal information on record by contacting their HR Consultant.

10. Individuals may challenge Sundal International 's compliance with this Privacy Policy. Sundal International will respond to individual complaints and questions relating to privacy. We will investigate and attempt to resolve all complaints. To challenge compliance with this Policy, individuals should forward their concerns in writing to Sundal International. We ensure that a complete investigation of all complaints has been undertaken and will report their findings to the individual in most instances within 30 days.

We know that protecting the privacy of our clients, partners and employees is important. If you have any questions or concerns about your privacy and our role in protecting it, please contact us.