



PRIVACY POLICY

Summa Management Group Inc. respects the privacy rights of our clients and employees and has committed to protect all personal information in our possession or control. We have adopted this 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.

Summa Management Group Inc. takes the privacy and confidentiality of our clients and employees very seriously. We have developed this Privacy Policy to clearly define our ongoing commitment to protecting privacy rights. Certain practices discussed in this Policy reflect requirements set out in both federal and provincial privacy legislation. Summa Management Group Inc. 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.

Personal information is information about an identifiable individual. It includes information such as age, income, opinions, home location and family. It does not include the name, title, business address or telephone number of an employee or our corporate clients.

Summa Management Group Inc. is accountable for all personal information in our possession or control. This includes any personal information that we receive directly from individual clients and employees, as well as individuals' personal information that we may receive indirectly, for example, through corporate and government clients. We are responsible for educating our employees about our Privacy Policy and their role in protecting your personal information. If you have questions about our privacy practices, please contact us at info@summamg.com.

We will inform you why we are collecting your personal information when the information is collected.

Client Information

In most instances, we will collect, use or disclose personal information about clients only for the purpose of providing professional services. Each Engagement Letter includes an explanation of why we require the information, what use will be made of it and with whom it may be shared in order to provide professional services.

Client personal information may also be disclosed internally and to other member firms of Summa Management Group Inc. for the purpose of determining compliance with applicable professional standards, our policies, or in the performance of quality reviews.



Summa Management Group Inc. will also collect and use personal information about clients, prospective clients and perspective employees, for the purpose of sending news and information updates or invitations to events hosted or sponsored by us.

Personal Information may also be shared internally in order to allow us to offer services or products that may be of interest to clients.

Employee Information

Summa Management Group Inc. collects personal information about our partners and employees in order to pay them, comply with laws, provide them with benefits, to improve on and manage programs, policies and employee relations and generally to establish, manage or terminate the employment. In certain cases, Summa Management Group Inc. may also aggregate employee personal information to provide business metrics and evaluate the effectiveness of our HR programs, but this aggregated information will not allow the identification of any individual.

We may also use or disclose employee information in the course of investigating, negotiating or completing a sale, financing or other business transaction involving all or any part of our business.

We also collect personal information from individuals seeking employment with Summa Management Group Inc.

When we collect personal information, we will inform you of the reasons why we require such information, what use will be made of it and with whom it may be shared. Collection may occur without knowledge or consent as permitted by law, including collection in the course of an investigation.

Summa Management Group Inc. will collect, use or disclose personal information about you only with your informed consent.

Client Personal Information

The Terms and Conditions of every Summa Management Group Inc. professional services engagement are documented in each Engagement Letter. These Terms and Conditions include a discussion about how Summa Management Group Inc. may use and disclose your personal information. By signing the Engagement Letter, the client will be providing its consent to the collection, use and disclosure described in the Terms and Conditions.



Employee Information

Forms and applications used to provide human resources-related services to partners and employees will describe the purposes for which their personal information is required and with whom it will be shared.

Employment candidates will also be advised of the purposes for which their personal information is being collected.

Summa Management Group Inc. 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. Where an employee or candidate for employment chooses not to provide us with permission to collect, use or disclose personal information, we may not be able to employ them, continue to employ them or to provide them with benefits.

Summa Management Group Inc. limits the amount and type of personal information we collect. Summa Management Group Inc. will limit the collection of personal information to that which is reasonably required to provide our services or operate our business.

Summa Management Group Inc. 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.

Use of Personal Information

If Summa Management Group Inc. intends to use personal information for any purpose not previously identified to the individual, we will obtain his/her prior consent.

However, Summa Management Group Inc. 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:

- 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
- 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

- 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.

Retention of Personal Information

In compliance with professional standards, we keep a record of the work performed by Summa Management Group Inc. employees. This record, or "working papers", may include personal information and will be retained until such working papers are no longer reasonably required for legal, administrative, audit or regulatory purposes. Working papers are safeguarded against inappropriate access, as discussed in Principle "7" below.

Summa Management Group Inc. retains personal information about current and past employees in accordance with employment laws and standards. We will destroy human resources and other files containing employee personal information when such information is no longer reasonably required for legal, administrative, audit or regulatory purposes. Certain additional information may be retained to administer and keep former employees informed about our programs. Former employees may request at any time that they not be contacted about our programs.

Personal information collected from individuals seeking employment with Summa Management Group Inc. will be retained by us for 24 months so that we may contact the applicant about other positions that may also be of interest. Should another suitable position at Summa Management Group Inc. become available within this 24 month period, we may contact the applicant to discuss this other position, and the applicant's information will be retained for an additional 24 months. If a candidate is hired, the personal information collected during the application process will be retained in order to establish, manage and terminate the employment relationship.

Summa Management Group Inc. will endeavor to keep accurate the personal information in our possession or control.

In order to provide clients with a professional level of service and employees with appropriate benefits, the personal information that we collect must be accurate, complete and current. From time to time, clients, partners and employees may be asked to update their personal information. Individuals are encouraged to advise us of any changes to their personal information that may be relevant to the services we are providing.



Clients are encouraged to contact their engagement person to update their personal information.

Employees and candidates should contact the HR should they need to update their personal information.

Summa Management Group Inc. protects your personal information with safeguards appropriate to the sensitivity of the information.

Summa Management Group Inc. will 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 that are not available to the public (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 to third parties for processing. We require third party processors to respect the confidentiality of personal information and all legal requirements under applicable Canadian federal and provincial privacy legislation, and to agree to contractual requirements that are consistent with this Privacy Policy. These third party processors are prohibited from using personal information, except for the specific purpose(s) for which we supply it to them.

In some circumstances, personal information may be processed and stored outside of Canada by Summa Management Group Inc. or a third party processor, and such personal information may be subject to disclosure in accordance with the laws applicable in the jurisdiction in which the information is processed or stored. These laws may not provide the same level of protection as Canadian privacy laws.

Summa Management Group Inc. will be open about the procedures used to manage your personal information.

The most up-to-date version of our privacy policy is available in by contacting us at info@summamg.com.

At their request, Summa Management Group Inc. 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.



Employees have the right to review and obtain copies of their personal information on record by contacting their HR representative.

In most instances, individuals will receive a response to their access request within 30 days. If an individual has any concerns about the access that is provided, they are encouraged to contact us at info@summamg.com.

Individuals may challenge Summa Management Group Inc. compliance with this Privacy Policy. Summa Management Group Inc. 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 Summa Management Group Inc. We will 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 at info@summamg.com.

2016.