

## **Brunelle Financial Planning Group Ltd./ Mark Brunelle**

### **Disclosure and Privacy Policy**

Mark Brunelle is a member in good standing of The Financial Advisors Association of Canada – Advocis, Million Dollar Round Table (MDRT), FP Canada. Mark Brunelle and Brunelle Financial Planning Group Ltd. are also bound by the relevant laws and regulations of the Province of Alberta licensed as **Accident & Sickness Insurance Agent, Life Insurance Agent, and Mutual Funds Representative**.

**Insurance Licensing:** Brunelle Financial Planning Group Ltd., sponsored by RBC Life Insurance Company

**Mutual Fund Licensing:** Portfolio Strategies Corporation

Brunelle Financial Planning Group Ltd. is licensed as an Accident & Sickness Insurance Agency, Life Insurance Agency.

Mark Brunelle is licensed as an Accident & Sickness Insurance Agent, Life Insurance Agent and Mutual Funds by the Province of Alberta. Brunelle Financial Planning Group Ltd., and Mark Brunelle maintains professional liability insurance coverage as required under Alberta Law and Regulation.

**Parties to this Agreement:** Brunelle Financial Planning Group Ltd. or Mark Brunelle offers their services to:

«FLName» & «SpouseName» for Click or tap here to enter text. and Click or tap here to enter text.

is/are the company issuing your policy/ies.

Brunelle Financial Planning Group Ltd. or Mark Brunelle represents the following insurers: Assumption Life, BMO Life, Canada Life, Canada Protection Plan, Desjardins Financial Security, Edge Benefits, Empire Life, Equitable Life, Foresters Financial, IA Financial, Ivari, Manulife Financial, RBC Insurance, Sun Life and Wawanesa Life. Contracting with additional companies is available to us, as required for specific client needs. I place the majority of my business with RBC Life, Equitable Life and Manulife for Life Insurance Products. I am associated with the Managing General Agent PPI Management (Edmonton).

If you choose to purchase a product through me, I will be paid by the company that offers that product. I am compensated by a sales commission at the time of sale and may receive a renewal (or service) commission if you keep that policy in force. I may also be eligible for additional compensation, such as bonuses, or non-monetary benefits, such as travel incentives, depending on various factors such as the volume or persistency of business that I place with a particular company during a given time.

**Product Suitability (Insurance):**  In consultation with you, to determine your insurance needs, you have expressed a desire to assess your financial needs. I have completed an insurance needs analysis and we have determined mutually that the following insurance coverage comprising the elements described below would be best suited to your situation:

- Coverage would best be provided on  Rental or  Ownership, or  a base of Ownership with some Rental basis.
- Coverage is required for  ## years or  for life and for the primary purpose of Click or tap here to enter text.
- Coverage would best be provided on a  level or  increasing.
- Premiums would be on a guaranteed basis for the cost of insurance only with no equity component.  Level or  increases every ## year/s.
- Premiums would be on a guaranteed basis for the cost of insurance only with the balance being interest sensitive.
- Premiums would be on a guaranteed basis for the cost of insurance and Guaranteed cash Value, and with the balance being interest sensitive.
- Account is a segregated fund, refer to specific Carrier Information Form
- Coverage is provided at a competitive price compared with similar products offered by other insurers for the term of the coverage including renewals.

I work as an independent broker and have surveyed a range of possible products available in the market that meet your specific needs using standardized multi-quoting search systems available to all agents and brokers.

I have recommended Click or tap here to enter text. to you based on:

- The suitability of the product for your needs.
- The availability of adequate or comparable substitutes.
- My relationship with the insurer.
- My experience with the insurer's underwriting and based on your medical history.
- My experience of the claims handling of the insurer.
- My experience of the ongoing administration of insurance policies by the insurer.

**Product Suitability (Mutual Funds):**  Please refer to the *Portfolio Strategies Corporation Client Relationship Disclosure* form

**Disclosure:** No insurance company, mutual fund company, MGA, MFDA dealer holds an ownership interest in Brunelle Financial Planning Group Ltd. There are no outstanding financial relationships, such as loans or other forms of indebtedness, other than agency relationships, in existence with between the agent and an insurance company.

**Conflict of Interest:** In my duty to disclose any conflict of interest with you as my client, I confirm that there is no conflict of interest in regard to the proposed sales transaction that you are considering, and that my overall recommendation takes into consideration and is based on my analysis and assessment of your financial and security needs. Brunelle Financial Planning Group Ltd. or Mark Brunelle agrees to notify the client of any and all existing or perceived conflicts of interests, if and when they arise, as they may relate to any recommendations made regarding transactions, prior to or at the time of making such recommendations.

**Confidentiality/Privacy:** During the course of the relationship, it will be necessary for the client to provide a variety of very personal financial information. Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc. The quality of the work undertaken on behalf of the client requires this personal information be accurate and complete. Brunelle Financial Planning Group Ltd. commits that all information will be held in strictest confidence and that no information shall be divulged about the client's personal situation to any outside organization or government agency without the client's prior consent, unless as may be required by law. It is further understood that in accordance with Alberta's Personal Information Protection Act and the Personal Information Protection and Electronic Documents Act (PIPEDA), the client directly authorizes and instructs Brunelle Financial Planning Group Ltd. to maintain information of a personal and private nature that could reasonably be considered pertinent or necessary in the provision of financial advice until such time as requested by the client in writing to destroy such information. I may provide your personal information to insurers through wholesale organizations known as Managing General Agencies (MGAs), which are contracted to provide administrative services to the insurers to facilitate the sale of insurance. I may share this personal information with my employees or service providers so that they can perform their duties, to insurers and any person or organization to which consent has been given and where authorized by law. I may also share this information with others to get you help in areas outside of my areas of expertise.

**What personal information do we collect?** We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- open and manage an account,
- deliver requested products and services,
- enrol a client in a program,
- contact clients about appointments,
- follow up with clients to determine satisfaction with products and services,
- notify clients of upcoming events of interest,
- meet regulatory requirements.

We normally collect client information directly from our clients. We may collect your information from other persons with your consent or as authorized by law. We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information.

#### **Use of Service Providers outside Canada**

Our service providers in the United States of America collect, use or disclose your personal information for the following purposes:

- transcribe meeting/call notes,
- Video meetings,
- e-mail service provider,
- deliver requested products and services,
- follow up with clients to determine satisfaction with products and services,
- notify clients of upcoming events of interest.

#### **Consent**

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

In cases where we collected personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure for the purpose for which the information was collected.

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

**How do we safeguard personal information?** We make every reasonable effort to ensure that client information is accurate and complete. We rely on our clients to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

We protect client personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information. Our computers and back-ups are encrypted, and paper files are kept in a secure location. Our staff understands the sensitivity of the data entrusted to their care.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

We retain client personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

We render client personal information non-identifying, or destroy records containing personal information once the information is no longer needed. We use appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records. We contract with a commercial shredding company for documents no longer needed.

#### **Access to records containing personal information**

Clients of Mark Brunelle and/or Brunelle Financial Planning Group Ltd. have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to Mark Brunelle. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. For personal information collected before January 2004, if we do not have a record of disclosures, we will provide information about any disclosure of your information that is likely to have occurred.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

**Questions and complaints regarding Privacy:** If you have a question or concern about any collection, use or disclosure of personal information by Brunelle Financial Planning Group Ltd., or about a request for access to your own personal information, please contact Mark Brunelle in the first instance:

#169, 3-11 Bellerose Dr., St. Albert, AB T8N 5C9 E-mail: mark@brunellefinancial.com Phone: 780-460-4249

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta: Office of the Information and Privacy Commissioner of Alberta: #410, 9925 - 109 St. Edmonton, AB, T5K 2J8 3W2 1-888-878-4044 www.oipc.ab.ca

**Should you require additional information about my qualifications or the nature of my business relationships, I would be pleased to assist you.**

**Medical Information policy** The undersigned proposed life insured, consents and authorizes The Life Insurance Company to provide my health, medical and life style information which The Life Insurance Company obtains during its underwriting and review process, regardless of the source of such health, medical and life style information, to my advisor for the purposes of my advisor explaining to me any adverse assessment of my insurability, and maintaining that information to help with future recommendations.

The **Canadian Anti-Spam legislation (CASL)** comes/came into effect, July 1, 2014, and with respect to that:

YES  I/we confirm my/our consent to receive emails and other electronic messages. If at any time you would like to withdraw your consent or update your profile and preferences, you can do so by sending an email to [administration@brunellefinancial.com](mailto:administration@brunellefinancial.com)

NO  I/we Do NOT give my/our consent to receive emails and other electronic messages. I/we understand that this may limit our communications from you to account servicing only.

The client has read the preceding provisions. This will be considered their express written consent to be contacted by telephone, fax, email or other means necessary to service their accounts, and promote or offer additional service and products where appropriate. The client understands the nature of this agreement and agrees to its terms.

Signed at [Click or tap here to enter text.](#) this [Click or tap here to enter text.](#) day of [Click or tap here to enter text.](#) 20##.

«FLName»

«SpouseName»

\_\_\_\_\_  
Client - signature

\_\_\_\_\_  
Spouse - Signature (if applicable)

\_\_\_\_\_  
Signature of Brunelle Financial Planning Group Ltd. or Mark Brunelle