

# PRIVACY POLICY

LATELLA & BASTONE FINANCIAL GROUP



GRUPE FINANCIER  
LATELLA & BASTONE  
FINANCIAL GROUP

## Abstract

The purpose of Latella & Bastone Financial Group's Privacy Policy is to describe to users (people using our site and/or service) how their personal information will be collected, stored, and analyzed. Furthermore, the enclosed document outlines the processes that are in place to safeguard your personal information. Finally, our Privacy Policy mentions the types of information that is collected from users.

**EFFECTIVE DATE**

December 17<sup>th</sup>, 2020

**WEBSITE**

[www.lbfinancialgroup.ca](http://www.lbfinancialgroup.ca)

**EDITION**

1

**PHONE #**

514-567-1579

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## INTRODUCTION

LBFG is committed to maintaining robust privacy protections for its users. Our *Privacy Policy* is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Service. The *Privacy Policy* that you are currently reading has been last updated on December 17<sup>th</sup>, 2020 and applies to anyone who uses our Site or Service.

## Terminology

For purposes of this Agreement the terms below have the following definitions:

- ❖ **Site** refers to our Company's website, accessed at [www.lbfinancialgroup.ca](http://www.lbfinancialgroup.ca).
- ❖ **Service** refers to our Company's services accessed via the Site. The conditions associated with using Latella & Bastone Financial Group's services are found within the *Term of Service Policy* located within our site, [www.lbfinancialgroup.ca](http://www.lbfinancialgroup.ca)
- ❖ **We, Us, & Our** refers to Latella & Bastone Financial Group (LBFG).
- ❖ **You** refer to users of our Site and/or our Service.

## Disclosure

By accessing our Site and/or our Service, you accept our *Privacy Policy* and *Terms of Use*. Moreover, you grant us permission to collect, store, use and disclose your "Personal Information" as described in this *Privacy Policy*.

## Changes to Our Privacy Policy

We reserve the right to change this policy and our *Terms of Service* at any time. We will notify you of significant changes to our *Privacy Policy* by placing a prominent notice on our site. Moreover, when changes are made to our *Privacy Policy*, an update will be made to the "effective date" found at the top of our *Privacy Policy*.

## Contact Us

If you have any questions regarding our *Privacy Policy* or the practices of this Site, please contact us by sending an email to [info@lbfinancialgroup.ca](mailto:info@lbfinancialgroup.ca) or call us at 514-567-1579.

## INFORMATION WE COLLECT

We collect “Non-Personal Information” and “Personal Information.” **Non-Personal Information** includes information that cannot be used to personally identify you, such as general demographic information, user behavior, and preferences that you have submitted. **Personal Information** may include but is not limited to the following items:

- ❖ First & Last Name
- ❖ Date of Birth
- ❖ Gender & Marital Status
- ❖ Username & Password
- ❖ Email Address, Phone Number, & Home Address
- ❖ Payment Information (e.g. payment type, credit card number, etc.)

*Please note that only personal information that you submitted upon our explicit request is collected, stored, and/or analyzed.*

### **Non-Personal Information (collected via technology)**

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device(s). Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site.

### **Personal Information (provided to us upon explicit request)**

In addition to the information provided automatically by your browser when you visit the Site, you may choose to create an account where you will be able to add “Personal Information” about yourself. To create an account, you must enter an email address which will act as your username. Moreover, you will be prompted to create a password. Please note that additional information such as your date of birth may be required in order for you to create an account with us.

## Children's Privacy

The Site and the Service are not directed to anyone under the age of 16. The Site does not knowingly collect or solicit information from anyone under the age of 16 or allow anyone under the age of 16 to sign up for the Service. In the event that we learn that we have gathered personal information from anyone under the age of 16 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at [info@lbfinancialgroup.ca](mailto:info@lbfinancialgroup.ca)

## Data Retention

If you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. Moreover, we will maintain your "Personal & Non-Personal Information" for our records unless and until you ask us to delete this information.

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your "Personal Information" may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this *Privacy Policy*, and that any acquirer of our assets may continue to process your "Personal Information" as set forth in this *Privacy Policy*.

## WHY + HOW: WE COLLECT, USE, & SHARE INFORMATION

We collect, process, and distribute different types of information about our user for following reasons:

1. To provide personalized services that are uniquely tailored to individual users
2. To facilitate communications between authorized stakeholders
3. To help us monitor, carry out, and improve the services that we offer
4. If permission is granted from the user, to market the services to them

## Personal Information

LBFFG does not sell, trade, rent or otherwise share for marketing purposes your "Personal Information" with third parties without your consent. We do share "Personal

Information” with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to user’s email address for purposes of sending emails from us. Those vendors use your “Personal Information” only at our direction and in accordance with our *Privacy Policy*.

In general, the “Personal Information” you provide to us is used to help us communicate with you. For example, we use “Personal Information” to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers. We may share “Personal Information” with outside parties if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable legal process or enforceable governmental request; to enforce applicable *Terms of Service*, including investigation of potential violations; address fraud, security or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

## **Non-Personal Information**

In general, we use “Non-Personal Information” to help us improve the Service and customize the user experience. We also aggregate “Non-Personal Information” in order to track trends and analyze use patterns on the Site. This *Privacy Policy* does not limit in any way our use or disclosure of “Non-Personal Information” and we reserve the right to use and disclose such “Non-Personal Information” to our partners, advertisers and other third parties at our discretion.

We refer to “Non-Personal Information” information that is automatically-collected as **Device Information**.

We collect “Device Information” using the following technologies:

**Cookies**- are data files that are placed on your device or computer and often include an anonymous unique identifier.

**Log files**- track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.

**Web beacons-** (aka. Pixels) are electronic files used to record information about how you browse the Site.

You can instruct your browser to refuse some of the tools which is used to collect your “Data Information”. However, if you choose to do this, please be informed that you may not be able to use some features of our Service.

## **PROTECTING YOUR PERSONAL INFORMATION**

We implement security measures designed to protect your information from unauthorized access. Your account is protected by your account password and we urge you to take steps to keep your personal information safe by not disclosing your password and by logging out of your account after each use. We further protect your information from potential security breaches by implementing certain technological security measures such as encryption and firewalls.

However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of our security measures. By using our Service, you acknowledge that you understand and agree to assume these risks.

### **How We Safeguard Your Information**

We provide reasonable and appropriate security measures in connection with securing the “Personal Information” we collect. Below are some of the measures that have been put in place to protect your “Personal Information”:

- ✓ Regularly update our security practices to conform to the best practices of protecting user “Personal Information”
- ✓ Adhere to all applicable laws and security standards
- ✓ Use technologies such as encryption to securely transmit sensitive data
- ✓ Train our staff on the processes and technologies set in place to safeguard your

“Personal Information”

### **Transfer of Data**

Your data, including “Personal Information”, may be transferred to — and maintained on — computers located outside of your province, country or other governmental jurisdiction where

the data protection laws may differ than those from your jurisdiction.

By using our website, you understand that your content, may be transferred unencrypted and involve (a) transmissions over various networks; and (b) changes to conform and adapt to technical requirements of connecting networks or devices.

Latella & Bastone Financial Group will take all steps necessary to ensure that your data is treated securely and in accordance with this *Privacy Policy*. Furthermore, no transfer of your “Personal Information” will take place to an organization or a country unless there are adequate controls in place including the security of your data.

### **Third-Party Service Providers**

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your “Personal Information” only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **YOUR RIGHTS REGARDING PERSONAL INFORMATION**

At Latella & Bastone Financial Group, we believe that it is important for users to take control of their “Personal Information”. It is for this reason that we have policies and procedures in place that allows user to edit, delete, and restrict “Personal Information” that is collected from them.

### **Communication**

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. You can also indicate that you do not wish to receive marketing communications from us, by replying to the communication you receive.

Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or opting out, we may continue to send you administrative emails including, for example, periodic updates to our *Privacy Policy*.

## **Modifying Your Account**

If you have created an online account with us and would like to update the “Personal Information” you have provided us with, you can access your account to view and make changes or corrections to your “Personal Information”. In the event that you wish to request access, to limit use, or to limit disclosure, please contact us at [info@lbfinancialgroup.ca](mailto:info@lbfinancialgroup.ca)

## **LINKS TO OTHER WEBSITES**

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This *Privacy Policy* applies solely to information collected by us through the Site and the Service. Therefore, this *Privacy Policy* does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.