

Privacy Policy

Oltre Financial Inc. (“Oltre”) provides certain online goods and services software for personalized lifetime tax and estate optimization. **WE DO NOT PROVIDE FINANCIAL OR INVESTMENT ADVICE.**

Oltre respects your concerns about privacy and takes the protection of personal information very seriously. We comply with all Canadian federal and provincial privacy laws and are responsible for the personal information we collect and hold. Our representatives have been trained about our privacy policies and practices. Unless compelled to do so by law or we sell off any part of Oltre's business operations, Oltre will never sell your personal information or use it for purposes not described in this policy.

What personal information may be collected?

Personal information is any information that identifies you or by which your identity may be deduced. The personal information we require includes some or all of the following, depending which of Oltre's services you are using:

- a. Your name
- b. Date of birth
- d. Email address
- e. Information about your investments, retirement plans and related information

How we use your information

We will use your information to manage your use of any Oltre services. We will also use your information in order to monitor and improve our existing services and to develop new services.

We may also use your information to conduct research and to develop statistics about our services. Though we may disclose or sell that research and those statistics to third parties, any information which can identify individuals will first be completely removed.

Most of the information which we collect is provided by you. You input the information in the course of creating your profile when using Oltre's services. Below are some details about additional ways in which Oltre may collect information about you and use that information in connection with the services it offers:

Customer Service

If you contact our customer service team, we will ask you for information required only to answer your question or concern. This information may include your name, phone number and/or email address. We will retain this information to personalize your experience with us and better assist you the next time you contact us.

Google Analytics/Cookies

Oltre collects usage information and traffic data on our websites by using Google Analytics. To learn more about Google Analytics please visit their website: <http://www.google.com/analytics/>

Third Party Links

Oltre's websites may contain links to third party websites that are not under our control. We provide links to other websites solely for your convenience and information. Oltre does not endorse or otherwise accept responsibility for the content or privacy policies of those sites. Other websites may collect and treat information they collect differently, so Oltre encourages you to carefully review the privacy policy for each website you visit.

How do we share your information

Oltre uses third party service providers to provide some of its services. As a result, we may need to share your personal information with those service providers or have them collect that information from you. Those service providers can only use your information to perform services for Oltre, and Oltre always requires its service providers to take all the same precautions as we do to keep your information safe and secure.

As mentioned above, your information will also be used to help develop research and statistics which we will share with third parties, but we will always ensure that no information that identifies an individual is included in those research and statistics.

Security of Information

Oltre employs industry recognized security safeguards to protect any personal information provided to us from loss, misuse and unauthorized alteration. We protect all information stored on our servers from unauthorized access using commercially available computer security products (e.g. firewalls), as well as carefully developed security procedures and practices. Although Oltre takes reasonable and prudent measures to protect our computer systems and any personal information that we have collected from unauthorized use, access, disclosure, misuse, alteration or destruction, no security measures can provide absolute protection. As such, we cannot guarantee the security of your personal information, and are not responsible for unauthorized use, access, disclosure, misuse, alteration or destruction of your personal information. Oltre relies on industry leading professionals to support our services, and we enter into detailed agreements with each of them. The agreements oblige those professionals to protect your personal information at least as well as Oltre does.

In certain circumstances, the third parties which assist Oltre in delivering Oltre's services may require delivery of personal information by email. As described above, Oltre takes steps, aligned with industry best practices, to ensure the security of your information; however, it is impossible to guarantee the security of that information. By using our services, you agree to the inherent risks associated with email transmissions.

Accessing and Updating Personal Information

You have the right to request and review any of the information we may currently have about you. You may update your personal information that has been provided to us or request that we delete it. We will take reasonable steps to ensure that any updates and instructions that you provide are processed in a timely and complete manner.

Retention of Personal Information

Financial and other information received by Oltre will be retained for as long as required by applicable legal requirements, by contractual commitments, or for a period of seven years from the date the information was last used, whichever is longer.

Privacy Policy Updates

This Privacy Policy may be updated from time to time. The current version of the Policy will always be posted on our website at oltrefinancial.com/privacy-policy. We reserve the right to change our privacy information practices and to apply the changed practices to all information we have about you. By using our services, you agree to be bound by the terms of the most up-to-date version of the Privacy Policy located on the website at any given time.

Contacting Oltre

If you have any questions or concerns about Oltre's privacy practices or about the personal information which you have provided to us, please contact our Privacy Officer by email at privacy@oltrefinancial.com or write to:

Oltre Financial Inc.
Attention: Privacy Officer
1107 South Park St
Halifax, NS
B3H 2W6

Oltre will respond to your inquiry in a timely and complete manner.