

This Privacy Policy sets out the principles and procedures that Breakwater Accounting Advisors LLP (“Breakwater”, “we” and “our”) follows in meeting its privacy commitments to its clients and in complying with the requirements of the federal Protection of Personal Information and Electronic Documents Act (PIPEDA) and the B.C. Personal Information Protection Act (PIPA).

The Personal Information Protection Act (PIPA) governs how all private sector organizations in British Columbia handle personal information of clients, employees, and others. Personal information is defined as information that can identify an individual and information about an identifiable individual. This policy formalizes our commitment to protect any personal information received, developed and used by us in the course of providing services to our clients.

Definition of personal information

Personal information means any information about an identifiable individual other than that individual's name, title, business address or telephone number (often called, "business card" or "phone book" information). Personal information includes age, gender, marital status, health status, financial status, home address, etc. Such information includes information specifically related to you, our client, or personal information of others, such as your employees, clients, or customers, that we may encounter in the course of providing our professional services to you. We are accountable for all personal information in our possession or control. This includes any personal information we receive directly from clients who are individuals, or indirectly through clients that are organizations (e.g., corporations, government entities, not-for-profit organizations).

We have:

- Established and put into effect policies and procedures aimed at properly protecting personal information;
- Educated our principals and employees regarding our privacy policies, and of their roles and responsibilities in keeping personal information private; and
- Appointed a Privacy Officer (privacy@breakwateradvisors.ca) to oversee privacy issues

We collect personal information from our clients and use and disclose such personal information only for the purposes of providing requested professional services to our clients. We identify the purpose for which we collect personal information from our clients before it is collected.





Client consent

We obtain client consent before collecting personal information from our clients. Our engagement letters set out your responsibility to obtain any consents required under applicable privacy legislation, for collection, use and disclosure to us of personal information. By signing such engagement letters, you are formally acknowledging this responsibility.

Collection of personal information

We collect only that personal information required to perform our professional services and to operate our business. This personal information is collected by fair and lawful means. Our principals and employees involved in a particular engagement will access only the information required to complete that engagement or to deal with other matters such as invoicing and general correspondence.

Disclosure and retention of personal information

We use or disclose personal information only for purposes for which we have consent, or as required by law. We retain personal information only as long as necessary to fulfill those purposes. As required by professional standards, rules of professional conduct and regulation, we document the work we perform in records, commonly called working paper files. Such files may include personal information obtained from a client. Working paper files and other files are retained for the period of time required by law and regulation.

The personal information collected from a client during the course of a professional service engagement may be:

- Shared with Breakwater personnel participating in such engagement;
- Disclosed to Breakwater principals and employees to the extent required to assess compliance with applicable professional standards, rules of professional conduct, and our policies, and to conduct quality control reviews of the work performed;
- Provided to the members of an audit committee and to the board of directors of a particular organization, and others in the company that might not otherwise have access to the information, in the course of communicating certain aspects of the results of our engagement; and
- Provided to external professional practice inspectors (e.g., representatives of the Canadian Public Accountability Board, or the Institute of Chartered Accountants of B.C.), who by law, professional regulation, or contract, have the right of access to our files for inspection purposes.

Breakwater regularly and systematically destroys, erases, or makes anonymous personal information that is no longer required to fulfill the above collection purposes, and is no longer required by laws and regulations.



Protection of personal information

We protect the privacy of personal information in our possession or control by using security safeguards appropriate to the sensitivity of the information. Physical security (e.g., restricted access, locked rooms and filing cabinets) is maintained over personal information stored in hard copy form. Principals and employees are authorized to access personal information based on client assignment and quality control responsibilities. Authentication is used to prevent unauthorized access to personal information stored electronically. For files and other materials containing personal information entrusted to a third party service provider (e.g., a provider of paper based or electronic file storage), Breakwater obtains appropriate assurance to affirm that the level of protection of personal information by the third party is equivalent to that of Breakwater.

Managing personal information

We are open about the procedures we use to manage personal information. Up-to-date information regarding this Privacy Policy can be obtained from the Privacy Officer (privacy@breakwateradvisors.ca).

Handling of requests from clients

We respond on a timely basis to requests from clients about their personal information that we possess or control. Individual clients of Breakwater have the right to contact the engagement principal in charge of providing services to them to obtain access to their personal information. Similarly, authorized officers or employees of organizations that are clients of Breakwater have the right to contact the engagement principal in charge of providing services to them to obtain access to personal information provided by that client. In certain situations, however, Breakwater may not be able to give clients access to all their personal information. In such situations, we will explain the reasons why access must be denied and any recourse the client may have, except where prohibited by law.

Approach to complaints and questions relating to privacy

Clients may challenge the compliance of Breakwater with its Privacy Policy. We have policies and procedures to receive, investigate, and respond to client complaints and questions relating to privacy. To challenge the compliance of Breakwater with its Privacy Policy, clients are asked to provide an email message or letter to our Privacy Officer. The Privacy Officer will ensure that a complete investigation of the client complaint is undertaken and will report the results of this investigation to the client, in most cases, within 30 days.