



WOLSELEY LAW PRIVACY POLICY

Policy Governing the Collection, Use and Disclosure of Personal Information (the “Privacy Policy”)

Wolseley Law LLP (“**Wolseley Law**”) recognizes the importance of privacy and the sensitivity of personal information. As lawyers, we have a professional obligation to keep confidential all information we receive within a lawyer-client relationship. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

Your Privacy Rights

The manner in which Wolseley Law handles your personal information is also governed, in part, by the Law Society of Manitoba *Code of Professional Conduct* and applicable laws, including [Personal Information Protection and Electronic Documents Act](#), and the *Canadian Standards Association Model Code for the Protection of Personal Information*, which it incorporates. These obligations extend to lawyers and law firms, including Wolseley Law. The Act gives you rights concerning the privacy of your personal information.

Why Does Wolseley Law Need Personal Information?

Wolseley Law provides legal services and products to a wide range of clients. In doing so, it collects personal information to provide those clients with legal services, information (including materials concerning its services and developments in the law). In addition, some personal information relating to your financial affairs is required to comply with client identification and verification rules set out by the Law Society of Manitoba.

What personal information do we collect?

Personal information is any information that identifies you, or by which your identity could be deduced. If we did not collect and use your personal information, we could not provide you with legal services.

The personal information collected and retained will vary with the legal services being provided to a given client. Information is generally collected directly from the individual or business entity to which the information relates, but may be collected from additional sources as outlined in this Privacy Policy. The types of information collected may include:

- Contact Information including name, address, telephone number, e-mail address, and fax number;
- Identification: photocopies and/or scans of valid government-issued identification, such as a driver's license, passport, birth certificate, etc.;
- Information relating to or required for your legal matter, which may include family information, financial information, information regarding your property, and/or information concerning relevant individuals to your matter; and
- Professional/Legal Obligations: information permitted or required to be collected by law or to meet our professional obligations.

How do we collect your personal information?

We collect information only by lawful and fair means, and not in an unreasonably intrusive way. Wherever possible we collect your personal information directly from you, both at the start of a retainer and in the course of our representation. Sometimes we may obtain information about you from other sources, for example:

- your insurance company;
- your real estate agent in a property transaction;

- from a government agency or registry (including Canada Revenue Agency);
- your employer, if we are acting for you, at its request; or
- your accountant.

Consent

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally, we ask for your consent in writing, but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us.

Use of Your Information

We use your personal information to provide legal advice and services to you (including verification of any potential or actual conflicts of interest), to administer our client (time and billing databases) and to include you in any direct marketing activities, as well as any use required to meet professional or legal responsibilities. If you tell us that you no longer wish to receive information about our services, or about new developments in the law, we will not send any further material.

Wolseley Law does not disclose your personal information to any third party to enable them to market their products and services. For example, we do not provide our client mailing lists to other law firms.

Disclosure of your Personal Information

Under certain circumstances, Wolseley Law will disclose your personal information:

- when we are required or authorized by law to do so, for example if a court issues a subpoena;
- when you have consented to the disclosure;
- when the legal services we are providing to you requires us give your information to third parties (for example a lender in a real estate mortgage transaction) your consent will be implied, unless you tell us otherwise;
- where it is necessary to establish or collect fees;

- if we engage a third party to provide services to us (like computer back-up services or accounting services, AI assistance, or archival file storage) and the third party is bound by our privacy policy;
- if we engage expert witnesses on your behalf;
- if we retain other law firms at your request, and on your behalf;
- if the information is Publicly Available Personal Information, as it is defined under the *Personal Information Protection and Electronic Documents Act*.

Updating Your Information

Since we use your personal information to provide legal services to you, it is important that the information be accurate and up-to-date. If during the course of the retainer, any of your information changes, please inform us so that we can make any necessary changes.

How is my information stored?

Your personal information is stored both physically and electronically.

Our office uses your personal information in some or all of the following services:

- Google Workspace, including Google Drive and email;
- Clio;
- OpenAI;
- Quickbooks Online;
- Asana;
- Jotform; and
- Other software and web-based platforms and services that we may engage from time to time.

There is no additional charge for this and they are designed to help us be as efficient as possible in serving you. The servers and storage for these services are located around the world including in the United States and may be subject to United States' law, including the *Patriot Act* as well as other similar legislation in other countries. If you do not wish us to use any of these services please inform us immediately, however, we may be unable to continue to

work on your matter and any data already provided to us may continue to be stored.

Is My Personal Information Secure?

Wolseley Law takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. Among the steps taken to protect your information are:

- premises security;
- restricted file access to personal information;
- deploying technological safeguards like dual-factor authentication for email access, security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

Access to Your Personal Information

You may ask for access to any personal information we hold about you. Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

Correcting Errors

If Wolseley Law holds information about you and you can establish that it is not accurate, complete and up-to-date, Wolseley Law will take reasonable steps to correct it.

Can I be denied access to my Personal Information?

Your rights to access your personal information are not absolute. We may deny access when:

- * it is required or authorized by law (for example, when a record containing personal information about you is protected by solicitor-client privilege);
- * to do so would reveal confidential commercial information, and the personal information cannot be severed from the record;
- * to do so could reasonably be expected to threaten the life or security of another individual, and the personal information cannot be severed from the record; or
- * the information was generated in the course of a formal dispute resolution process.

If we deny your request for access to, or refuse a request to correct information, we shall explain why. Wolseley Law does not use your Social Insurance Number as a way of identifying or organizing the information we hold upon you, although your Social Insurance Number may be collected by us if required by your legal matter. Please be aware that lawyer and staff notes about your file are not considered to be your personal information and will not be released to you under any request for your information.

Can I request anonymity?

Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name (for example, by accessing general information on our website). However, if you retain our office to provide legal services to you, we are required to confirm the identity of all new clients. It may also require us disclose information to FINTRAC or other regulatory bodies in relation to certain financial transactions.

Communicating with Us

You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send or request personal or confidential information.

Changes to this Privacy Policy

Since Wolseley Law regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

Requests for Access

If you have any questions, or wish to access your personal information, please write to our Privacy Contact at:

Tim Brown, c/o Wolseley Law
120 Sherbrook Street
Winnipeg, Manitoba
R3C 2B4
tim@wolseleylaw.ca

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

30 Rue Victoria
Gatineau, Quebec K1A 1H3
1.800.282.1376.

Employment Inquiries

If you apply to Wolseley Law for a job, we need to consider your personal information, as part of our review process. We normally retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

Web Site

Our website contains links to other sites, which are not governed by this privacy policy. On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimise our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information. Like many site

operators, we collect information that your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we use third party services such as Google Analytics that collect, monitor and analyze our user's usage. You can read more about Google Analytics here <https://www.google.com/analytics> We also use cookies. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.