

alterfina

Procedure for dealing with complaints regarding the protection of personal information

The present procedure for dealing with complaints relating to the protection of personal information is intended to ensure that complaints are handled adequately, uniformly and diligently. It aims to establish a fair and transparent procedure for dealing with complaints received by the company and is also intended to support the quality of our services.

This procedure governs the receipt of complaints, the transmission of acknowledgements of receipt, the creation of the complaint files and the compilation of complaints received, with a view to continuous improvement.

DEFINITION OF "PERSONAL INFORMATION"

Personal information is defined as follows: "Personal information is any information which relates to a natural person and directly or indirectly allows that person to be identified."

COMPLAINT

Anyone who has reason to believe:

- that a confidentiality incident has occurred and the company has failed to ensure the confidentiality of the personal information it holds or;
- that the company has collected, used or disclosed personal information in a manner that does not comply with a law or regulation on the protection of personal information applicable to the complainant.

Is NOT considered a complaint regarding the protection of personal information:

- A request for access to information (although handled by the Privacy Officer);
- A request for rectification of personal information (although handled by the Privacy Officer);
- Dissatisfaction with the service provided by the company or one of its employees that does not involve personal information.

An anonymous complaint will be deemed not to have been received if the Privacy Officer is unable to identify the complainant and the nature of the complaint.

Consumers who believe that the company has collected, used or disclosed their personal information in violation of applicable privacy laws or regulations should contact the company's Privacy Officer in writing to attempt to resolve the dispute.

Complaints must be made in writing. All complaints must include the complainant's contact details, a description of the incident, the date or period when the incident occurred, the personal information affected by the incident, the harm suffered and/or the settlement requested.

By e-mail :
privacy@alterfina.ca

By post :
Alterfina
c/o Privacy Officer
100 King West St., Suite 5700
Toronto, ON M5X 1C7

PRIVACY OFFICER

The Privacy Officer oversees application of the procedure for dealing with complaints relating to the protection of personal information is the company's Privacy Officer. He/she acts as respondent to the complainant. Any employee who receives a verbal or written complaint (e-mail, formal notice or legal proceedings) relating to personal information must inform the complainant that such a complaint must be made in writing and handled by the Privacy Officer. The employee may refer the complainant to the company's website for the contact details of the Privacy Officer.

In addition, any employee who becomes aware of a situation that could give rise to a potential complaint must immediately communicate the situation to the Privacy Officer.

If the complaint involves the conduct of the Privacy Officer, or in the absence of such person, the complaint will be handled by a member from the Legal Department.

The Privacy Officer's main duties are to:

- Oversee application of this procedure;
- Ensure that an acknowledgement of receipt is sent to the complainant;
- Investigate the claims made by the complainant;
- Reply to the complainant;
- Recommend remedial and corrective measures to the company, where appropriate;
- Record the complaint in a complaints register.

TAKING CHARGE OF THE FILE

The Privacy Officer must acknowledge receipt of the complaint within 5 working days of receipt.

The acknowledgement of receipt must contain the following information:

- A description of the complaint received, specifying the complaint against the company, the harm suffered and/or the corrective action requested;
- The name and contact details of the person responsible for handling the complaint;
- In the case of an incomplete complaint, a notice indicating the need to provide additional information within 20 days, failing which the complaint is deemed to have been abandoned;
- Copy of this procedure for dealing with complaints.

COMPLAINT HANDLING AND CORRECTIVE MEASURES

Complaints must be processed and investigated within a reasonable timeframe, taking into account the nature and complexity of the complaint.

In general, a complaint should be processed within 30 days of receipt of all necessary information. This period may be longer or shorter, depending on the degree of complexity of the complaint, the availability of the information required for analysis, and the level of collaboration of the parties involved. The complainant must be informed of any delay in processing the complaint, and the notice must explain the reasons for the delay and set a target for the expected processing time.

Each complaint must be the subject of a thorough examination of the facts specific to each case. The person in charge must gather the facts of the complaint impartially from all parties involved. The company reserves the right to engage external legal counsel to assist in the analysis of the complaint and the response.

When the Privacy Officer has completed the analysis of the complaint and a decision is ready to be rendered, he/she must provide a written response to the customer. The report must include the following information:

- Summary of complaint;
- The company's decision regarding the complaint, including the reasons for the decision and whether the complaint is well-founded, the corrective measures that will be applied in accordance with our confidentiality incident management policy.

The company may reject the complaint if it is unfounded or take steps to rectify the situation as quickly as possible.

The company then registers the complaint in the complaints register. Each complaint is recorded in the company's complaints register, documenting the following information:

- Date and time the complaint was received;
- Name and contact details of the complainant;
- File number;
- Nature of complaint;
- Copy of the complainant's written complaint, including the complaint against the company, the harm suffered and/or the corrective action requested;
- Outcome of the complaint handling process: analysis and supporting documents;
- Measures taken by the company, if any;
- Copy of the company's written, reasoned response to the complainant;
- Date and decision on the complaint.

A copy of all correspondence relating to a complaint must be kept in the complaints register.

APPROVED PROCEDURES

This Procedure for dealing with complaints regarding the protection of personal information is approved by the company's Privacy Officer.

Last updated on 2025-11-24