



Privacy Policy

Effective as of April 29, 2026

Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA") and various provincial legislation ("privacy legislation") govern the protection of personal information. PSG Financial Inc. ("Peacock Sheridan Group", "PSG", "we", "our", or "us") and its affiliates are committed to protecting the privacy and confidentiality of customer personal information in accordance with Canadian federal privacy legislation, the principles and standards set out in PIPEDA, and any provincial privacy laws and privacy legislation that may apply.

Protecting the privacy of customer personal information is an integral part of doing business at PSG and is important to us and the companies whose products and services we offer. We are committed to collecting, using and disclosing personal information responsibly and in compliance with applicable privacy protection laws.

The purpose of this privacy policy (the "**Policy**") is to explain how and for what purposes we collect, use, share or otherwise process personal information and how we safeguard the confidentiality of personal information when customers interact with PSG or access PSG's website <https://www.peacocksheridan.com/> (the "**website**").

Managing and protecting the collection, use, and disclosure of personal information is a continuous process and we will continually review and update our personal information management practices, and Policy, as needed to ensure the protection of individuals' privacy and ensure continual alignment with applicable privacy laws, principles, and industry standards.

Note: This Policy does not apply to the personal information of employees of PSG.



Table of contents

1. Personal Information	3
2. Accountability	3
3. PSG Website Data Collection	3
4. Identifying Purposes.....	5
5. Consent	6
6. Limited Collection of Personal Information	7
7. Limiting Use, Disclosure and Retention of Personal Information	7
8. Accuracy.....	8
9. Safeguards.....	8
10. Openness.....	8
11. Access and Privacy Choices.....	9
12. Challenging Compliance	9
13. Contact Us	9



1. Personal Information

“Personal Information” means any information about an identifiable individual and includes information such as name, age, address, banking information, health records, marital status, financial information, and other information of a personal nature.

2. Accountability

In order to provide customers with access to recommendations concerning financial products and services, we may collect certain personal information. As such we are responsible for the protection of personal information in our possession and will take reasonable steps and measures to safeguard that information, regardless of format.

Where PSG discloses or transfers personal information to our affiliates, third parties, insurers, or industry specialists, we use contractual or other safeguards to provide comparable levels of protection.

Compliance with applicable privacy legislation and principles rests with all staff at PSG, however PSG’s Privacy Officer is responsible for ongoing agency oversight, legislation and industry monitoring, enforcement and practices, of privacy procedures.

3. PSG Website Data Collection

Why We Collect Information

Our primary reason for collecting information is to improve our website, its features and content to allow users to easily navigate the website.

Types of Information We Collect and its Uses

While using our website, we may request or obtain certain personally identifiable information (“Personal Information”), such as your name, phone number, email, or mailing address. We may use this information, with your consent and as permitted by law, to send you PSG publications, newsletters, and other communications of interest. You may opt-out at any time by following the instructions in our emails or contacting us directly, and we will remove you from our mailing list within 10 business days of your request.

We may use your Personal Information for general business purposes, including fulfilling service requests, managing our website and operations, responding to inquiries, meeting legal or contractual obligations, and ensuring system and network security.

When you visit our website, we automatically collect browser data such as your IP address, pages visited, time spent, search queries, and access times (“Browser Data”). We use this information to analyze website usage, support technical administration, and improve functionality and user experience.



Use of Cookies

Like many websites, we use “cookies”— small data files stored on your device — to collect information for record-keeping and functionality, and to provide you with the best browsing experience. Our site may also use other similar technologies, such as web beacons, pixel or gif tags, and action tags. Those technologies also collect information that assists us in improving our services, use of the Website, advertising and customer communications.

Consent to Cookies

Before cookies are placed on your computer or device, when visiting our website for the first time, you are shown a pop-up message requesting your consent to set those cookies. By giving your consent, either by accepting or closing the message, you agree to the use of cookies in accordance with the provisions of this Policy enabling us to provide the best possible experience and services to you. You may withdraw consent to the placing of cookies (unless those cookies are strictly necessary). You can return to your cookie preferences to review and/or remove them at any time by visiting your browser settings. However, withdrawing or disabling cookies may cause difficulties in using our website and that certain features of our website may not function fully or as intended.

We use the following types of cookies on our website:

- **Strictly necessary cookies:** essential to allow you to fully use our website and its full features. These cookies cannot be turned off as they are essential for enabling the basic functionalities of the website, and do not gather information about you that could be used for marketing.
- **Functional cookies:** help perform certain functionalities such as sharing the content of the website on social media platforms, collecting feedback, and other third-party features. They allow the website to remember your language preferences.
- **Analytics cookies:** used to understand how visitors interact with the website. They help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.
- **Security cookies** are strictly necessary to protect the website and its users, including enabling secure authentication, preventing fraudulent access, and maintaining the integrity of user sessions. These cookies do not collect personal information for tracking or advertising purposes and are required for the site to function securely.



- **Persistent cookies:** store login details for future visits.
- **Session ID cookies:** stores an identifier for a specific part, area, or group within a website or system. It helps the website know which section of content, account area, store view, or workflow you are currently using.
- **Session-state cookies:** used to maintain the overall state of a user's interaction with a website during a single visit. They enable the website to remember actions and context across multiple page requests, such as navigation progress, form inputs, or authentication status, for the duration of the session.
- **Third-Party cookies:** are not placed by us; instead, they are placed by third parties that provide services to us and/or to you. Third-party cookies may be used by advertising services to provide tailored advertising to you on our website, or by third parties providing analytics services to us, such as website visitation and tracking data (these cookies will work in the same way as analytics cookies described above).

For more information about the collection, use, disclosure, and retention of personal information obtained through our website, please visit <https://www.peacocksheridan.com/privacy/>.

4. Identifying Purposes

PSG collects directly from customers, and uses, discloses, and retains personal information (such as health, corporate, financial, contact, and related information) for the following purposes:

- for identification verification of the customer;
- to determine eligibility for products or services;
- to provide or deliver appropriate products or services;
- to accurately assess, provide advice, and identify appropriate insurance products and related services to meet the needs of each of our customers;
- to process, complete, and submit applications for insurance;
- to administer any products or services you purchase;
- to support the on-going servicing of the client file and insurance;
- to advise customers of new products or services that may be suited;
- to communicate with a customer regarding an insurance policy;
- from time to time to communicate marketing material, if consent provided;
- to advise our customers of initiatives which they may find beneficial;
- to analyze risk and business results;



- to effectively manage customer complaints relating to an insurance policy;
- to respond to customer inquiries or feedback, and ensure appropriate customer service support
- to investigate, detect, and/or prevent money-laundering and/or fraud;
- to comply with applicable laws, rules, and regulations;
- as may be required or authorized by law.

PSG will not collect, use, or disclose information beyond that required to fulfill the purposes specified at the time of collection.

5. Consent

PSG will collect, use, or disclose personal information with the knowledge and/or consent of the customer. Customer personal information will be used for the purposes indicated under Identifying Purposes.

Consent may be implied (i.e. inferred from the circumstances and nature of the interaction), express (e.g. orally, electronically, or in writing), and in some jurisdictions may be given by your authorized representative (e.g. lawyer, legal guardian, or person having power of attorney).

In certain circumstances, as permitted or required by law, we may collect, use, or disclose personal information without the knowledge or consent of the customer, such as to investigate contravention of a law, to act in response to an emergency that threatens the life, health or security of an individual, or to comply with a subpoena, warrant or court order.

In the event the customer provides information about a third party, the customer represents they have obtained that individual's consent to the collection, use and disclosure in accordance with this policy.

Customers agree to:

- provide accurate information throughout the business relationship with PSG;
- allow PSG to collect, use, and disclose information on an as-needed basis with applicable suppliers, managing general agents ("MGA"), insurers, associates, industry specialists, and affiliate organizations, for the purpose of developing and maintaining a financial plan, and which may retain some information on file for present use and reference;
- allow PSG to retain personal information - regardless of format - for as long as necessary to fulfill the identifying purpose(s), or as long as required per PSG's records retention policy, or as long as required by law;



- to the assignment of your file, including your personal information, to another agent and/or MGA, to continue to service your needs, in the event that PSG can no longer provide/offer its services for whatever reason (e.g. change in risk appetite, bankruptcy, etc.). Customers, however, have the right to choose their own agent at that time, should they not agree to the assignment;
- where applicable, consent to their personal information being maintained in a joint client file with their spouse/common-law partner, and consent to their personal information within the joint client file being disclosed to their spouse/common-law partner upon request and/or where necessary.

6. Limited Collection of Personal Information

We will only collect information, including personal information, that is necessary to satisfy the identified purposes and to meet any regulatory obligations. We will only use fair and lawful means to collect this information.

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information will be retained only as long as necessary to fulfill those purposes, or as long as required in accordance with PSG's records retention policy, or as required by law (e.g. legal hold orders).

7. Limiting Use, Disclosure and Retention of Personal Information

PSG will not use or disclose personal information for purposes other than that for which it was collected, to perform applicable duties in servicing the customer, to provide advice, except with the consent of the individual or as required by law.

PSG may disclose customer personal information to insurers through MGAs, which are contracted to provide administrative services to the insurers to facilitate the sale and/or service of insurance. PSG may share personal information with unrelated companies ("service providers") so they can carry out certain functions (such as order fulfillment, data processing, administration, investigation, and storage), to insurers and any person or organization to which consent has been given and where authorized by law. We may also share this information with industry specialists and affiliates to get help in areas outside of our area of expertise, which may be necessary for the purposes of ensuring we are able to fulfill our obligations in providing the appropriate financial products and services to our customers.

Customer personal information may be stored outside of their province of residence but within Canada. We may also disclose personal information to organizations outside of their province of residence or outside Canada who process or store personal information as part of their duties.



Therefore, personal information may be subject to the laws of other jurisdictions, which may allow disclosure to courts, law enforcement, or other government authorities of those jurisdictions under certain circumstances.

PSG retains personal information only as long as necessary to accomplish the identified purpose, and to satisfy our legal and business obligations. Personal information that is no longer required to fulfil its purpose shall be destroyed in accordance with PSG's records retention policy.

8. Accuracy

PSG will use its best efforts to ensure that personal information is as accurate, complete and up to date as is necessary for the identified purposes. Where appropriate, we will attempt to update personal information we hold in our records in an effort to determine whether the recommendations made are still appropriate.

9. Safeguards

PSG, its employees and advisors, affiliates, MGA, suppliers, and any third party that we grant access to customer records, are required to keep the information protected, confidential, and to be used only for identified purposes. Information that is no longer required for the intended purpose will be destroyed.

PSG will protect personal information in our possession with safeguards appropriate to the sensitivity of the information. Methods of protection include physical measures (e.g. restricted access to the office and locked filing cabinets), organizational measures (e.g. limited access on a "need-to-know" basis), and technological measures (e.g. use of passwords and encryption).

10. Openness

Upon customer written request, we shall provide a copy of our privacy policy. As our privacy policy is made available to the public, it can be viewed directly on our website at <https://www.peacocksheridan.com/privacy/>.

Our Privacy Policy may change from time to time, with the latest version being viewable by visiting our website. Customers' continued consent to our collection, use and disclosure practices following notification of any material change and/or continued access to our website following the posting of any changes to this Policy shall constitute acceptance of those changes.



11. Access and Privacy Choices

Upon written request, customers may request access to review their personal information we have retained about them. Such request can be made by contacting us directly, see contact information below.

PSG may refuse a request or be unable to provide access to all the personal information as permitted or required by law. Examples include but are not limited to information that contains references to other individuals or contains confidential commercial information, where such information cannot be severed from the record; information collected in the course of a formal dispute resolution process; and information that is subject to solicitor-client privilege.

Customers may choose to withhold or withdraw their consent at any time by contacting us directly; subject to legal or contractual obligations, and on providing us with reasonable notice. However, this action may prevent or affect our ability to properly conduct a complete analysis and offer appropriate insurance solutions; prevent us from providing the products and/or services requested; or may end our business relationship.

Customers may also:

- request access to their personal information we hold about them;
- request to have their personal information corrected or updated;
- request information about our data processing practices and how it is being processed.

12. Challenging Compliance

If there are any concerns about our collection, use or disclosure of personal information, customers have the right to raise their concerns with PSG and/or with the applicable Privacy Commissioner.

13. Contact Us

If there are any questions or concerns about our Privacy Policy, personal information, or you wish to exercise privacy rights, please contact us using any of the following methods:

Peacock Sheridan Group
Address: 314-1290 St. Paul Street, Kelowna, BC
Canada, V1Y 2C9
Phone: (250) 869-1451
Toll Free: 1(866) 311-1154
Fax: (250) 869-1452
Email Address: privacy@peacocksheridan.com