

## **14 PKI PRIVACY POLICY (SCHEDULE E)**

This Privacy Policy applies to the personal information of Subscribers collected by or on behalf of FundSERV Inc. (“FundSERV”) in relation to its operation of FundSERV PKI. This Privacy Policy does not apply to personal information collected by a FundSERV PKI Member on its own accord or to personal information that is collected by a FundSERV PKI Member which is not provided to FundSERV.

By subscribing to FundSERV PKI you acknowledge the necessity for FundSERV to collect your personal information for authentication purposes as a condition of providing services to you and you consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy. Furthermore, in subscribing to FundSERV PKI you acknowledge that certificates issued to third parties provide information that may be specifically linked to you and you consent to the provision of such certificates to third parties in accordance with the Certificate Policy.

Your consent to this Privacy Policy may be revoked in accordance with applicable privacy legislation. You acknowledge that revoking your consent may result in the revocation of certificates issued by FundSERV in your name and termination of your access rights to FundSERV PKI. Revocation of certificates and termination of services may occur when FundSERV determines, in its sole discretion, that your continued access to FundSERV PKI subsequent to revocation of your consent to this Privacy Policy may harm the security and/or integrity of FundSERV PKI services.

### **Collection of Information**

FundSERV may collect personal information as necessary to ensure the integrity of FundSERV PKI for all FundSERV PKI Participants. This may include the collection of personal information as part of a pre-screening authentication and identification process prior to granting access to FundSERV PKI services. The pre-screening authentication process will in most cases be carried out by Member Organizations of FundSERV PKI. The authentication role can be performed by HR or Internal Security personnel. Where FundSERV does not directly authenticate your identity, FundSERV will only be provided with documentation confirming that your identity has been authenticated in accordance with the CPS. Copies of the documents you present for purposes of authentication will not be requested by FundSERV or maintained in FundSERV’s records unless necessary to ensure the continuing integrity of FundSERV PKI or for auditing purposes.

Also, personal information will be collected and maintained in order to authenticate your identity in the event that you lose your FundSERV PKI private key or in the event that your key is stolen. To facilitate authentication of your identity in the case of lost or stolen keys you will be asked to answer five (5) personal security questions prior to obtaining your FundSERV PKI keys. FundSERV reserves the right to amend the security questions from time to time. You will need to be able to answer some or all of the security questions in order to request FundSERV to cancel certificates and to obtain continuing uninterrupted access to FundSERV PKI in the event of lost or stolen keys.

### **Disclosure**

Your personal information will not be used or disclosed for purposes other than those set out in this Privacy Policy, unless your consent is obtained or such disclosure is required by law. Personal information will be retained only as long as is necessary to fulfill the purposes set out in this Privacy Policy and to provide FundSERV PKI services requested by you. FundSERV will engage external auditors to review FundSERV PKI authentication and data security standards in accordance with the FundSERV Certificate Policy

FundSERV may wish to cross-certify FundSERV PKI with other certification authorities. In order to cross-certify it is necessary for FundSERV and the cross-certifying authority, to satisfy themselves that compatible authentication and security procedures are in place. As part of this process it may be necessary to share your personal information with the cross-certifying authority. If cross-certification is successfully undertaken your personal information may be shared with the cross-certifying authority on a continuing basis.

### **Certificates and Personal Keys Assigned to You by FundSERV**

Certificates provided by FundSERV contain information which may be specifically linked to you. In order to ensure continuing access to your certificates FundSERV will maintain copies of all FundSERV PKI certificates issued. These certificates will be secured, used and disclosed in accordance with the FundSERV Certificate Policy.

FundSERV will also maintain copies of your public and private keys in order to provide you with key recovery services. Your personal keys will be maintained and secured in accordance with the FundSERV Certificate Policy.

### **Storage of Personal Information**

FundSERV will ensure that your personal information is protected by security safeguards commensurate with the sensitivity level of the information. FundSERV employees will be educated with respect to the content and the necessity of compliance with this Privacy Policy.

### **Ensuring Accuracy And Access To Your Personal Information**

FundSERV is committed to maintaining the accuracy of personal information it maintains in its records and to providing you with access to your personal information contained in such records. If you are aware of any inaccuracies in your personal information as maintained by FundSERV, would like obtain access to your personal information records, or if you have any comments or questions, please contact us with your request in writing at:

FundSERV Inc.  
The Exchange Tower – Suite 1730  
130 King Street West  
Toronto, Ontario  
M5X 1E5  
Canada

Attn: FundSERV Board of Directors