



# SANDERSON

## Privacy Policy

**Effective Date:** December 2024

**Company Name:** Sanderson

**Website:** <https://investmentsmart.biz>

**Contact Email:** [smart@investmentinc.ca](mailto:smart@investmentinc.ca)

### Table of Contents

- 1. Introduction
- 2. Data We Collect
  - Personal Information
  - KYC Documentation
  - Financial Information
  - Technical Information
- 3. How We Use Your Data
  - Service Delivery
  - Regulatory Compliance
  - Service Improvement
  - Fraud Prevention
- 4. Sharing Your Data
- 5. Data Retention
- 6. Your Rights
  - Access and Transparency
  - Correction and Deletion
  - Dispute Resolution
- 7. How We Protect Your Data
- 8. Cookies and Tracking
- 9. Changes to This Privacy Policy
- 10. Contact Us

### 1. Introduction

Sanderson (referred to as “we,” “our,” or “us”) is committed to safeguarding the privacy and security of our clients and website users. This Privacy Policy outlines the types of personal data we collect, how we use and protect it, and the rights users have regarding their information.

## **2. Data We Collect**

We may collect the following categories of data:

### Personal Information:

- Full name
- Date of birth
- Residential address
- Email address
- Phone number

### KYC Documentation:

- Passport or government-issued ID
- Proof of address (e.g., utility bill)

### Financial Information:

- Bank account details
- Transaction history

### Technical Information:

- IP address
- Browser type and version
- Operating system
- Time and date of access
- Cookies and tracking technologies

## **3. How We Use Your Data**

We use your data for the following purposes:

### Service Delivery

- To process and fulfill your transactions
- To manage your account
- To provide requested information and support

### Regulatory Compliance

- To meet anti-money laundering (AML) and Know Your Customer (KYC) obligations
- To comply with applicable laws and regulations

### Service Improvement

- To analyze how you use our website and services to improve them
- To develop new products and services

### Fraud Prevention

- To detect and prevent fraudulent activities and unauthorized access

## **4. Sharing Your Data**

We may share your data with:

- Regulatory Authorities:
- To comply with laws and report suspicious activities to FINTRAC or other authorities.
- Service Providers:
- Payment processors, banks, and financial institutions involved in transaction processing.
- Verification Services:
- For identity checks and automated fraud prevention systems.

We ensure that all third parties adhere to strict confidentiality agreements and comply with applicable privacy standards.

## **5. Data Retention**

We retain your data for a minimum of 5 years after the conclusion of our business relationship, as required by Canadian laws. Longer retention may be required in cases of ongoing legal or regulatory inquiries.

## **6. Your Rights**

You have the following rights:

- Access and Transparency:

You may request a copy of the personal data we hold about you.

- Correction and Deletion:

You can ask to update or delete your personal data, where applicable.

- Dispute Resolution:

You may file a complaint if you believe your data privacy rights have been violated.

To exercise these rights, please contact us at [smart@investmentinc.ca](mailto:smart@investmentinc.ca)

## **7. How We Protect Your Data**

We implement robust technical and organizational measures, including encryption, secure servers, and restricted access, to protect your personal data from unauthorized access, alteration, or loss.

## **8. Cookies and Tracking**

We use cookies to improve your browsing experience, analyze website traffic, and personalize your interaction with our services. You can manage or disable cookies through your browser settings.

## **9. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. Changes will be posted on this page with an updated “Effective Date.”

## **10. Contact Us**

If you have any questions regarding this Privacy Policy, please contact us at [smart@investmentinc.ca](mailto:smart@investmentinc.ca)