



*"mortgaging made easy"*

GEORGE H.

# MOORE MORTGAGE SERVICES

*Brokerage Number 10251*

Bus. 613-395-4637  
Toll Free. 800-829-1344  
Fax. 613-395-4698

# Privacy Policy



## Privacy Policy<sup>1</sup>

At George Henry Moore (operating as George H. Moore Mortgage Services) (herein after referred to as "Moore Mortgages"), we are committed to protecting the privacy and confidentiality of the personal information of our clients (individually, the "Client" and collectively, the "Clients".) As financial service providers, we have a professional obligation to maintain in confidence information we receive within our role as a financial services provider. The purpose of this Privacy Policy is to advise clients as to why we ask for personal information, how we use it, what safeguards we employ, and how to contact us with privacy-related matters.

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P.O. Box 635, 125 West Front Street, Stirling, Ontario K0K 3E0

Email: [george@mooremortgages.ca](mailto:george@mooremortgages.ca)

Website: [www.mooremortgages.ca](http://www.mooremortgages.ca)



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## **What Is Personal Information?**

In this Privacy Policy, "Personal Information" means information that is gathered in connection with an application, pre-approval, request for information for a mortgage(s) or loan(s) and insurance or other product through Moore Mortgages or Moore Mortgages affiliates and is provided to, or collected by, Moore Mortgages and its staff or by Moore Mortgages' agents, associates, and affiliates on Moore Mortgages' behalf (collectively, "Moore Mortgages").

## **Why Moore Mortgages Collects Personal Information**

Moore Mortgages collects and uses Personal Information for the following purposes:

- Provide mortgage brokering services to the Client and offer products and services best suited to their needs, including arranging and/or renewing loan(s)/mortgage(s), informing the client of group creditor insurance and other products offered or approved by Moore Mortgages or its affiliates that may be of interest to the Client;
- Checking Client credit worthiness through credit bureau inquiry and personal information agents who have information on a Client's financial position.
- Advising Clients of the financial options, as well as, ongoing developments of the mortgage market and industry;
- Auditing the services provided to our Clients;
- Compliance with all municipal, provincial, federal and other applicable laws; and
- Such other specific purposes which are communicated to the Client by a member of Moore Mortgages before collection of such Personal Information.

Except when otherwise permitted by law, we will only use a Client's Personal Information for the purposes identified to the Client. When Personal Information is to be used for a purpose not identified, we will take all reasonable steps to ensure that new purpose is identified prior to use.

## **How Do We Collect Personal Information?**

The Client is our main source of information. With the Client's consent, we may also obtain information directly from a third party to help us determine eligibility for various financial products and services. For credit matters, for example, it is essential that we know the clients'

<sup>1</sup> Regulation 188-08, Section 57, PIPEDA

financial worth as well as the clients' credit record. We will also contact other lenders, financial institutions, credit bureaus and employers. Consent is therefore important because without it, we will not be able to carry out the appropriate inquiries and it might be difficult for us to offer the credit product requested. In most cases, consent is given on the forms used for specific products or, from time to time, on a separate form. The declaration of consent is clear and unambiguous.

## **Consent**

A clients' provision of Personal Information to Moore Mortgages means that they agree and consent that Moore Mortgages can collect, use and disclose such Personal Information in compliance with this Privacy Policy. Moore Mortgages will not collect, use or disclose a Client's Personal Information without the Client's requisite consent, except in certain extraordinary circumstances. Such extraordinary circumstances shall include without limitation, when legal, medical or security reasons make it impossible or impractical to obtain consent or where it is otherwise in the best interests of the Client.

The most common method we use to obtain a Client's consent is by way of the Client's consent

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as confirmed by the application. Where practicable, we may also obtain a Client's consent through oral communications or other written documentation.

Our Clients may withdraw their consent by written notice to us at any time, subject to any legal or contractual restrictions and reasonable notice. A Client's refusal to provide, or subsequent withdrawal of, his or her consent may affect Moore Mortgages' ability to provide the Client with mortgage services. A member of Moore Mortgages will inform the Client of the implications of such withdrawal. To withdraw consent, a Client should contact the Chief Privacy Officer in writing at:

Attn: Chief Privacy Officer  
George H. Moore Mortgage Services  
P.O. Box 635, 125 West Front Street  
Stirling ON K0K 3E0  
Phone: 613.395.4637  
Fax: 613.395.4698

## **Use and Disclosure of Personal Information**

We will use a Client's Personal Information to provide financial advice and services to the Client, to administer our database, to include Clients in direct marketing Activities and for the other uses described above under the heading "Why Moore Mortgages Collects Personal Information". Under certain circumstances, Moore Mortgages will disclose a Client's personal information to third parties. Specifically, Personal Information may be used, shared and disclosed to, from, or with, the members of Moore Mortgages, witnesses in a litigation proceeding, experts retained on a Client's behalf, private investigators, agents retained on behalf of a Client, credit reporting agencies, credit bureaus, as well as such other third parties as are necessary to facilitate the matter for which the Client has retained our office and provided its consent.

Under certain circumstances Moore Mortgages may disclose Personal Information where:

- required or authorized by law to do so, for example if a court issues a subpoena;
- a Client has consented to the disclosure;
- when mortgage services by Moore Mortgages are provided to a Client requiring us to give Personal Information about a Client to a third party (for example, to a lender in a real estate mortgage transaction) the Client's consent will be implied, unless the Client tells us otherwise;
- where it is necessary to pull a credit bureau for purposes of processing a mortgage transaction;
- if Moore Mortgages engages a third party to provide administrative or support services to us (such as computer back-up services, shredding or archival file storage) and the third party is bound by our Privacy Policy;
- protection of Moore Mortgages' best interests;
- protection of public interests such as the denouncement of criminal Activity such as fraud or money laundering. In all such cases, authorities are contacted and personal information may be disclosed;
- if we retain a law firm(s) to Act on our behalf for any reason; or
- if the information is already publicly known.

## **Limiting collection and retention of Personal Information**

Moore Mortgages limits the collection of a Client's Personal Information to that which is

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necessary for the purposes identified in this Privacy Policy as same may be amended from time to time, or for any additional purpose identified to the Client before the collection of the Personal Information. As well, Personal Information is not used or disclosed for purposes other than those for which it was originally collected, except with the consent of the Client or as otherwise permitted by law.

Moore Mortgages will retain Personal Information only for so long as it is needed to fulfill the purposes for which it was obtained and to meet our professional requirements as set out our governing regulatory bodies and/or any other legal requirement, statutory or otherwise, from time to time.

## **Accuracy**

Moore Mortgages strives to ensure that a Client's Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

## **Safeguards**

Moore Mortgages endeavors to maintain adequate safeguards to protect against loss, theft, unauthorized access, disclosure, copying, use or modification of Clients' Personal Information in the care of Moore Mortgages. Moore Mortgages uses various methods to safeguard personal information, including physical security, computer and electronic security, destruction of information no longer needed, and contractual protections with third party data processors.

## **Protection**

Client lists are never passed on to third parties other than affiliated members of Moore Mortgages. When they are hired, our employees and agents must undertake to respect the confidential nature of client information. Only employees and associates who need to view the file as part of their work have access to this information.

## **Accountability, Openness and Client Access**

Moore Mortgages is responsible for the Personal Information under its control and has appointed a Chief Privacy Officer to oversee our efforts to comply in all material respects with applicable privacy legislation and the terms of this Privacy Policy. The Chief Privacy Officer and those designated by the Chief Privacy Officer address and investigate questions or concerns regarding a Client's Personal Information.

Moore Mortgages will provide a Client access to their Personal Information. The Client may correct or amend any inaccuracies in the Client's Personal Information. Moore Mortgages has the right to refuse a request for access to Personal Information if:

- The information is protected by legal privilege;
- Granting access would reveal confidential commercial information;
- The information was collected for purposes related to the detection and prevention of fraud;
- The information was generated in the course of a formal dispute resolution process;
- The information would likely reveal personal information about another individual;
- The request is vexation or frivolous;
- To protect our firm's rights and property.

## **Changes to Privacy Policy**

Moore Mortgages will from time to time review and revisit privacy practices and this Privacy Policy.

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## **Moore Mortgages Web site**

Our Web site may contain links to other sites, which are not governed by this Privacy Policy. On our Web site, like most other commercial Web sites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

## **Communicating With Moore Mortgages**

We recognize that convenience and quick access to advice must be balanced with security needs. We use many different means to communicate with clients, some of which are more convenient such as e-mail. Our emails are sent with industry standard 128 bit encryption. Such encryption however does not guarantee privacy and security as encrypted messages can nonetheless be subject to interception and translation. If clients do not wish us to communicate by e-mail, they may speak with the consultant/broker/agent handling the matter about alternative arrangements.

Attn: Chief Privacy Officer

George H. Moore Mortgage Services

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Fax: 613.395.4698

## **AGENT PROTECTION OF DATA<sub>2</sub>**

All agents and brokers will take reasonable steps to protect personal data supplied by clients. All original documentation will be kept in secure premises not accessible to the public. Once a file is complete, any un-required documentation will be returned to the client immediately. Original documentation will be submitted to head office in either hardcopy or electronic format prior to the closing of the transaction. While agents may retain copies of files, every effort must be made to safeguard the information on hand.

**It should be noted that all files are the property of Moore Mortgages. Although brokers and agents may retain data for marketing purposes, the clients belong to Moore Mortgages.**

Any documentation not further required, must be shredded immediately.

All electronic documentation must be password protected. Laptops containing client files shall not be left unattended in public areas.

## **HEAD OFFICE PROTECTION OF DATA**

Head Office will take reasonable steps to ensure the security of the data of client files. Scanned documentation must be adequately protected and catalogued. All client records and personnel records will be kept in locked cabinets or in secured electronic format. All computers at head office will be password protected and data will be backed up on a regular basis by a third-party source.

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