



**iGeny**  
Croître grâce à la rigueur

## Privacy Policy

---

***Last modified: January 12, 2022***

This document is intended to introduce you to the Privacy Policy (hereinafter referred to as: the "Policy") established by Diversico Human Finances Inc, owner of the iGeny™ trademark (hereinafter: "iGeny" or "we"), owner, designer and manager of the [iGeny Pro System-Expert](#), the [Forms and Funds](#) virtual library, the [ScanSquad](#) mobile scanning and [TechnoSquad](#) technology standardization companies, as well as any other product or service (hereinafter: the "Service") offered on the site located at the URL [www.igeny.com](http://www.igeny.com) or at any other address that may be added or substituted (hereinafter: the "Site").

This Policy applies to any actions taken by **iGeny with** respect to the personal information or personal data and, as the case may be, confidential and/or sensitive information (hereinafter, collectively: the "Information") of any individual and company that requires its services or that has registered as a user (hereinafter: the "user(s)" or "you").

This policy informs you about how we maintain the confidentiality of your Information and respect your privacy. Specifically, this Policy addresses the following issues:

- i. What do we mean by "Intelligence"?
- ii. Our philosophy

- 1) [How is my Information collected?](#)
- 2) [How is my information used?](#)
- 3) [How is my information protected?](#)
- 4) [Do you use cookies?](#)
- 5) [For how long is my information retained?](#)
- 6) [Who ensures that my information is accurate and updated?](#)
- 7) [Can this policy be amended or altered?](#)
- 8) [How can I contact iGeny?](#)

### **i. What do we mean by "Information"?**

Information is any information about an individual that allows that individual to be identified. For example, Information may include an individual's name, contact information, website access code, and sensitive, confidential or private financial, legal, medical or other information. Confidential information and documents concerning the customers of users of products marketed by iGeny are also covered,

provided that said information and documents are transmitted to iGeny in compliance with its [terms of use](#).

## ii. Our philosophy

iGeny provides Service Users, and anyone with whom the account is shared (ex. assistant, supervisor, office administrator, etc.), with privileged access to information and documents registered in their account.

We are aware of the importance of ensuring that your privacy is protected, that it is important to ensure that your confidential and sensitive information is protected and that your discretion in this matter is respected.

Therefore we shall notify you with respect to any use made of your Information and shall take any measures deemed appropriate in order to ensure that the latter is used in accordance with this Policy and any and all applicable statutes, rules and regulations.

## 1. How is my information collected?

iGeny gathers your Information within the limits of what is required for the fulfillment of its mission. More particularly, we gather your Information in the following contexts:

### a. Your registration on the site

In order to further customize your account, you may be asked to add information in your user profile. Said additional information could include your business contact information, the name of your financial product suppliers, your advisor identification, the suppliers to which you are affiliated, the renewal date of your professional liability insurance, as well as any other relevant information with regards to the Service being offered.

All Personally Identifiable Information in your account will only be accessible by you, anyone with whom you share use of the account (e.g., assistant, supervisor, practice administrator, etc.), and by iGeny for administrative purposes only. It is your responsibility to keep your password confidential.

### b. Your profile

You may be asked to add additional Information to your user profile to further customize your account. This may include your full business contact information, the name of the financial product provider(s) with whom you have a relationship and the agent code number(s) they have assigned to you, the financial services firm(s) to which you are attached, the renewal date of your professional liability insurance policy, and any other information relevant to the Service offered.

## 2. How is my information used?

We assure you that **iGeny** will under no circumstances ever sell, disclose or exchange your Information to any third party without your explicit consent except where deemed necessary in order to carry out your instructions or in accordance with the provisions of this Policy.

Should we ever wish to use or to disclose your Information for purposes different from those purposes specifically outlined in this Policy, we undertake to do so only with your assent. Depending on the nature of the information and on any statutory or regulatory requirements applicable thereto, your assent may be given orally, or by signing a form or by sending a letter for that purpose or else implicitly, in certain cases where your assent can easily be ascertained.

Your Information is used as follows:

## **a. In connection with the management of our services**

In most cases, we use your Information in order to perform our services, as more fully described in section 1 of this Policy and sometimes in order to solve technical problems.

You are always entitled to access and to change or amend the Information as well as any information of a general nature found in your account.

Where it has been registered, we use your email address to contact you as and when required. You undertake to keep said address active for as long as you use the Site. Should you change your contact information, you must promptly change your account accordingly.

Moreover, your consent will be solicited prior to sending any electronic newsletters or other periodic mailings, and the ability to unsubscribe from our mailing lists will be available at all times in any such transmissions.

## **b. In connection with services provided by our external suppliers (subcontractors)**

iGeny is entitled to call upon outside suppliers in their capacity as subcontractors to provide top-quality service in certain specific fields. In that context, some of your Information may be sent to these suppliers. The latter undertake to comply with the provisions of this Policy and shall use any Information thus sent solely in connection with services intended for iGeny.

Nevertheless, should said outside suppliers wish to directly ask you to provide any additional information (e.g. in order to analyse your use of said services), you should receive advance notification thereof. Should you decide to provide this information, the outside supplier's Privacy Policy shall thereupon apply to said communication.

## **c. In the context of a legal obligation**

iGeny may need to access your Information and to disclose same to the appropriate persons or authorities should this be necessary in order to comply with any legal obligations or in order to comply with any court injunction, to secure and to assert its rights or to enforce the terms and conditions of Web Site use and that of any services offered thereon.

## **d. Integrated Services (Equisoft Connect)**

iGeny allows the import of certain personal data (hereinafter the "Data") of your contacts from a service provided by Equisoft (the "Integrated Service").

You can access the Equisoft / Connect data sharing service by connecting your iGeny account to your Equisoft / Connect account. This connection, once established, opens the secure gateway for importing Data.

As part of the data import, we retain the unique identifier ("ID") provided by Equisoft / Connect for each of your imported contacts so that we do not create duplicates during a subsequent import.

We do not share your personal data or your Data with other external systems.

## e. Integrated services (Google)

**iGeny** allows optional sharing of certain personal data (hereinafter the "Exportable Data") of your contacts (only their first name, last name, email address(es), mailing address(es), phone number(s) and year of birth) with a service provided by Google (the "Integrated Service") to be exported into the Google Contacts application.

You may access the iGeny data sharing service using your Google Account email address, in which case Google's standard authentication mechanism may require your consent.

Once Google confirms your permission, you allow us to export the exportable data to the Google Contacts application. We encourage you to review your privacy settings in Google Contacts to understand what information is made available to you, and to make appropriate changes if necessary. Please review Google's terms of use and privacy policies carefully before using their services and logging into our service.

As part of the export of exportable data, we retain the unique identifier ("ID") provided by Google for each of your exported contacts so that we do not create duplicates in a subsequent export.

We do not share your personal or exportable data with other external systems.

## 3. How is my information protected?

**iGeny** complies with the Canadian *Personal Information Protection and Electronic Documents Act* and the Quebec Act respecting the protection of personal information in the private sector. **iGeny** uses various measures to ensure the integrity and confidentiality of your Information. These measures are designed to prevent the loss or theft of your Information, as well as its unauthorized reproduction, modification, use, consultation and disclosure. Our Site is secured using industry recognized technologies, including SSL (encryption bytes256 or more).

Only authorized personnel may access your Information and only for the purposes stated herein or as required by the service being provided. Agreements are also in place between **iGeny** and its employees and contractors to ensure that your Information is used in a manner consistent with this Policy and any applicable laws, rules and regulations. However, no system is foolproof and we cannot guarantee the absolute security of your Information.

As part of the online payment of any paid subscription, certain information is required (name, address, email, credit card number, etc.). In order to ensure the security of the Information and credit information as well as the efficient management of the payment process, we have entrusted the management to an intermediary, Stripe, a reputable and reliable company. We do not collect or have access to any of your payment information.

This intermediary is authorized to retain data on transactions made by you through the Site, for the sole purpose of ensuring a secure payment process and archiving proof of transaction for effective customer protection and follow-up. This transactional data may also be used for validation and follow-up of your registration.

## 4. Do you use cookies?

A cookie is a small text file containing a single identification number transferred from a Site to your computer's hard disk (« Cookies »). A Cookie makes it possible to distinctly identify Site-users and to monitor some of their on-Site activities.

iGeny uses Cookies exclusively to improve the quality of its Site and that of its services, for instance in order to

find statistical information respecting Site attendance and how different features are used or in order to provide users with improved on-Site navigation experiences, for instance by storing selections made during previous Site visits.

iGeny shall use cookies exclusively in order to gather Information, in accordance with this Policy.

## 5. For how long is my information retained?

**iGeny** will keep your Information only for the period essential to the use of the services offered on the Site and for the purposes for which they are intended.

To give you the best possible access to the information you have entered in your profile, we keep it for as long as your account is open.

The account of any registered user who has not accessed it for a continuous period of one (1) year will be closed by **iGeny** if, within ten (10) days of **iGeny's** transmission (by email) of a notice to the user to that effect, the user has not provided instructions to the contrary.

In all other cases, unless otherwise required by law, **iGeny** will delete or destroy all Information and other information contained in any registered user's account upon closure of the user's account.

Information collected for statistical analysis may be retained indefinitely with the understanding that these reports do not identify you or provide access to other information about you personally.

## 6. Who ensures that my information is accurate and updated?

You are fully responsible for the establishment and management of your account and profile. You alone are responsible for making sure that the Information and any other information registered in your account is accurate and up-to-date.

## 7. Can this policy be amended or altered?

This Policy may be updated from time to time, **iGeny** reserving the right to amend or alter said Policy at its option through the addition or deletion of certain terms and conditions.

In order to help you find any amendments or alterations made to the Policy, as the case may be, we will clearly display modification dates on the Policy and/or in a space provided for that purpose on the Site.

## 8. How can I contact iGeny?

If you have any questions about this Policy, its latest updates, our practices regarding the collection or use, retention and disclosure of your Information, we invite you to contact us...

- by email : [info@igeny.com](mailto:info@igeny.com)
- by mail: iGeny, 200-2430, boulevard Lapinière, Brossard (Quebec) J4Z 2L7