



PRIVACY POLICY

SYWAYS Inc.

Version 2.0 | Effective: July 9, 2026

1. Introduction

SYWAYS Inc. ("SYWAYS," "we," "us," or "our") is committed to protecting the privacy and security of personal information entrusted to us by our clients. This Privacy Policy explains how we collect, use, disclose, and safeguard personal information in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA), the Digital Privacy Act, and applicable Canadian privacy law.

This policy applies to all personal information collected through our website, in person, by phone, by email, or through any other means in connection with the professional services we provide. All personal information handled by SYWAYS is stored on servers located in Canada.

2. Information We Collect

Depending on the services engaged, we may collect the following categories of personal information:

- Contact information — name, address, phone number, and email address
- Identification information — Social Insurance Number (SIN), date of birth, and government-issued identification
- Financial information — bank account details, income and expense records, payroll information, invoices, and receipts
- Business information — incorporation documents, registration details, and financial records
- Tax information — prior year filings, CRA correspondence, and tax slips
- Appointment and scheduling information — collected when you book a consultation through our online scheduling tool (Microsoft Bookings)
- Any other information reasonably required to deliver the specific service engaged

3. How We Use Your Information

We collect and use personal information only for purposes directly related to delivering the services you have engaged, including:

- Preparing and filing tax returns (T1, T2, T3) and GST/HST returns
- Processing payroll and maintaining payroll records
- Maintaining bookkeeping and financial records
- Assisting with business registration, incorporation, and startup services
- Preparing and maintaining corporate minute books and resolutions
- Liaising with the Canada Revenue Agency (CRA) on administrative matters where authorized
- Communicating with you about your engagement, including sending service-related emails
- Verifying your identity and complying with legal, regulatory, and anti-money laundering obligations where applicable
- Meeting our own legal and recordkeeping obligations

We do not use your personal information for any purpose unrelated to your engagement without your explicit consent. We do not send commercial electronic messages unless you have consented to receive them, in compliance with Canada's Anti-Spam Legislation (CASL).

4. Disclosure of Information

We do not sell, rent, or trade your personal information to any third party. We may disclose your information only in the following circumstances:

- To the Canada Revenue Agency (CRA) and other government authorities, as required to deliver your service or as required by law
- To third-party software providers used to deliver our services (accounting, payroll, tax, or scheduling software), solely for that purpose and subject to their own privacy obligations
- To our professional advisors, such as legal counsel or our insurer, subject to confidentiality obligations
- Where required or permitted by applicable law

5. Consent

By engaging SYWAYS, you consent to the collection, use, and disclosure of your personal information as described in this Privacy Policy. You may withdraw consent at any time by contacting us in writing. Please note that withdrawing consent may limit our ability to continue providing some or all of the services engaged.

6. Safeguarding Your Information

We maintain reasonable administrative, technical, and physical safeguards to protect your personal information, including:

- Use of secure, password-protected, and encrypted software platforms for accounting, payroll, and tax preparation
- Multi-factor authentication on all systems that access client data
- Limiting access to your information to those directly involved in delivering your service
- Secure storage of all personal information on servers located in Canada
- Secure transmission practices for both digital and paper-based records

No method of storage or transmission is completely secure. While we take all reasonable steps to protect your information, we cannot guarantee absolute security.

7. Privacy Breach Notification

In the event of a privacy breach that creates a real risk of significant harm to you, SYWAYS will notify you as soon as feasible, in accordance with our obligations under PIPEDA and the Digital Privacy Act. We will also report such breaches to the Office of the Privacy Commissioner of Canada where required. We maintain a record of all privacy breaches, regardless of whether notification is required.

8. Retention of Information

We retain personal information for as long as necessary to fulfill the purposes described in this policy, and as required by CRA recordkeeping rules — generally a minimum of six (6) years from the end of the last relevant tax year. After this period, information is securely destroyed or deleted in accordance with our Record Retention Policy, which is available upon request.

9. Your Rights

Subject to applicable law, you have the right to:

- Access the personal information we hold about you
- Request correction of inaccurate or incomplete information
- Ask questions about how your information is collected, used, or disclosed
- Withdraw consent, subject to legal or contractual restrictions

To exercise any of these rights, please contact us using the information below. We will respond to your request within 30 days.

10. Openness and Accountability

SYWAYS is accountable for all personal information in its possession or under its control, including information transferred to third-party service providers for processing. Our Privacy Policy is available to anyone upon request. For questions about our privacy practices, please contact us directly.

11. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in applicable law or our practices. The current version will always be available on our website at syways.com. The effective date at the top of this document reflects when the current version took effect.

12. Contact Us

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us:

SYWAYS Inc.

Phone: (416) 998-4331

Email: info@syways.com

Website: www.syways.com

If you are not satisfied with our response, you may contact the Office of the Privacy Commissioner of Canada at www.priv.gc.ca.