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Privacy Policy

Performance Financial Consultants Ltd., operating as PFC Wealth Solutions™

Effective date: August 11, 2026 | Version 2.1

Plain-language summary

PFC controls information used for PFC planning, BC corporate insurance activity, PFC administration and PFC-controlled marketing. Adrian may separately control information used in his individually licensed insurance capacity. Axcess, MAX Financial Ltd., insurers, portfolio managers, New World, Precious Metals International Ltd. and Questrade apply their own policies to information under their control.

1. Purpose and scope

Performance Financial Consultants Ltd., operating as PFC Wealth Solutions™ ('PFC,' 'we,' 'us' or 'our') is accountable for personal information under its control. This policy explains how PFC collects, uses, discloses, safeguards, retains and provides access to that information.

This policy applies to PFC websites, landing pages, forms, newsletters, events, consultations, PFC client relationships and PFC-controlled educational content. It does not automatically apply to information controlled by Adrian personally, Peter J. Merrick, The Merrick Spitters Reset Report™ collection points, or an independent organization.

PFC follows applicable Canadian private-sector privacy laws, including British Columbia's Personal Information Protection Act and the federal Personal Information Protection and Electronic Documents Act where applicable.

2. The Reset Report

The Merrick Spitters Reset Report™ is jointly owned intellectual property of Adrian C. Spitters and Peter J. Merrick and is an educational marketing brand, not a legal entity. Each subscription, download or inquiry form must identify the person or organization responsible for that collection point and link to the applicable privacy notice.

3. Accountability

PFC has designated a Privacy Officer. PFC remains responsible for information under its control when a service provider processes it for PFC. Independent organizations and Adrian in a separately identified individual capacity remain responsible for information under their control.

4. Service roles and information responsibility

Service	Information controller or responsible party
PFC planning and administration	PFC controls the engagement, PFC records and PFC-controlled communications.
British Columbia insurance	Depending on the disclosed capacity, Adrian individually or PFC may control the advisory relationship. MAX Financial Ltd. and insurers control information for their own processing, underwriting, policy and claims functions.
Ontario insurance	While PFC's Ontario corporate licence is pending, Adrian controls the individually licensed advisory activity. MAX Financial Ltd. and insurers control information for their own functions.
Axcess securities	Axcess controls securities information under its policies and recordkeeping obligations when Adrian acts as an Axcess Dealing Representative.
Portfolio management	The registered portfolio manager controls information collected for its mandate.
Direct New World referral	PFC or Adrian controls the introduction record. New World Precious Metals, Precious Metals International Ltd. and Questrade control information for their respective brokerage, account, transaction, custody or service functions.
Reset Report marketing	The identified controller on the applicable form controls the submitted information. The brand itself is not a legal entity or data controller.

5. Personal information PFC or Adrian may collect

- identity and contact information;
- family, marital, citizenship, residency, employment and business information;
- income, expenses, assets, liabilities, tax information, objectives, time horizon and risk information;
- health, medical, lifestyle, beneficiary, insurance and underwriting information where relevant and authorized;
- identification and compliance information required for a referral or regulated service;
- meeting notes, instructions, consents, correspondence, complaints and transaction records; and
- website, device, analytics and communication-preference information.

Collection is limited to information reasonably needed for identified purposes. Medical or underwriting information is not requested unless relevant to an insurance need or application.

6. How information is collected

- directly through meetings, forms, applications, correspondence, websites and approved digital tools;
- from an authorized family member, attorney, accountant or other professional;
- from MAX Financial Ltd., insurers, reinsurers, underwriting services, medical or paramedical providers and policy administrators;
- from Axcess, a portfolio manager, New World, Precious Metals International Ltd., Questrade or another referral party; and
- from service providers and lawful public or regulatory sources.

7. Purposes

- identify and communicate with an individual;
- understand circumstances, goals and requested service scope;
- provide PFC planning or individually or corporately licensed insurance services;
- submit and service insurance business through MAX Financial Ltd. and insurers;
- administer an authorized introduction to Axcess, a portfolio manager, New World or another professional;
- manage disclosures, consents, conflicts, compensation, complaints and records;
- deliver requested or lawfully permitted educational and marketing communications;
- operate, secure and improve systems and websites; and
- meet legal, tax, insurance, professional and regulatory obligations.

8. Consent and choices

Meaningful consent is sought according to the sensitivity of the information and circumstances. Consent may be express or implied where permitted. Express, written and informed consent is obtained where required by law, professional standards or the nature of a referral or disclosure.

Consent may be withdrawn subject to legal, contractual and regulatory limits and reasonable notice. Withdrawal may prevent a requested service. Commercial electronic messages include an unsubscribe mechanism, while service and regulatory messages may continue where necessary.

9. Disclosures to independent organizations

9.1 Insurance

Information may be disclosed to MAX Financial Ltd., insurers, reinsurers, underwriting services, medical or paramedical providers, laboratories and policy administrators for application, underwriting, policy issue, administration, claims and service. Each organization applies its own privacy policy to information under its control.

9.2 Securities and portfolio managers

With appropriate consent or as permitted by law, information may be disclosed to Axcess for identification, KYC, investor qualification, suitability, account opening, transaction and regulatory processes, or to a registered portfolio manager for its mandate.

9.3 Precious metals

For a direct precious-metals introduction, information may be disclosed to New World Precious Metals. New World acts as broker and may place business through Precious Metals International Ltd. or Questrade. The responsible organization applies its own privacy and recordkeeping requirements. Information provided through one channel is not assumed available through another without authority or consent.

9.4 Other disclosures

Information may also be disclosed to authorized professional advisers; technology, records, payment and communication providers; regulators, courts or law enforcement; parties needed to protect rights or investigate fraud or a security incident; and parties to a proposed or completed business transaction, subject to applicable safeguards.

10. Compensation, referrals and conflicts

MAX Financial Ltd. or an insurer may pay insurance compensation directly to Adrian, to PFC, or through a disclosed combination. Axcess compensation may include referral compensation and dealing-representative compensation. New World may pay qualifying direct-referral compensation to PFC. Compensation can create an actual or potential conflict and is addressed through capacity separation, written disclosure, consent where required and applicable oversight.

11. Websites, cookies and electronic communications

PFC websites may use cookies and similar technologies to operate pages, remember preferences, measure traffic, detect misuse and improve content. A collection point using analytics, advertising or embedded services should identify the applicable provider and consent choice where required. Email, text and other electronic communications carry security risks; highly sensitive information should not be sent through an unapproved channel.

12. Processing outside Canada

Some service providers may store or process information outside a province or outside Canada. Information in another jurisdiction may be accessible under that jurisdiction's laws. Contractual, administrative and technical measures appropriate to the circumstances are used.

13. Safeguards, incidents, retention and disposal

Safeguards are appropriate to sensitivity, volume, format and purpose and include access controls, confidentiality obligations, secure systems, records practices and staff or contractor oversight. Suspected incidents are investigated and required notices are provided. Information is retained only as long as reasonably needed for identified purposes and legal, insurance, tax, professional and recordkeeping requirements, then securely destroyed, deleted or anonymized where appropriate.

14. Access, correction and information about others

An individual may request access to information under PFC's control and request correction of inaccurate or incomplete information. Identity may be verified and access may be limited where permitted or required by law. A person providing information about someone else confirms authority to do so and that any required notice has been provided.

15. Questions, requests and complaints

Contact the controller responsible for the information. PFC's Privacy Officer handles PFC information. Adrian handles information under his individually disclosed capacity. Axcess, MAX Financial Ltd., an insurer, a portfolio manager, New World, Precious Metals International Ltd. or Questrade handles information under its control. An individual may also contact the applicable federal or provincial privacy regulator.

Adrian C. Spitters, CFP®, FCSI®, CEA

President and Private Wealth Advisor and PFC Privacy Officer

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BC PIPA | Office of the Privacy Commissioner of Canada

Policy updates. This policy may be updated for changes in law, technology, services or business relationships. Material changes will be communicated as appropriate.