Advisor Assistant

Compliance Officer Brief

Executive Summary: Advisor Assistant is local desktop software (client folders, included CRM, daily to-do list, and Canadian planning reports) running on the advisor's own Windows 11, macOS, or Linux computer. It sits beside your dealer or MGA back-office, never stores dealer credentials or MFA, and prepares drafts only; dealer approval remains the dealer's decision. **No client name, SIN, account number, or contact detail is sent to or stored by Advisor Assistant.** Our Toronto calculation service accepts numbers with no client identifiers and a province code only, enforced locally and server-side (`HTTP 400 PII_REJECTED`), logs no request bodies, and retains nothing after answering.

Data Boundary & Custody Matrix

TORONTO NUMBERS-ONLY BOUNDARY

Data Category	Storage Location	Sent to Advisor Assistant?	Enforcement Control
Client files, notes, KYC, PDFs	Advisor's own disk (plain folders)	**Never**	Local folders only; no vendor cloud copy. Advisor's own encrypted backup destination covers disaster recovery.
Included CRM & daily to-do list	Advisor's own computer (local only)	**Never**	Runs only on your computer; other computers cannot reach it.
Planning & tax math inputs	Processed in memory, Toronto, Ontario	**Numbers with no client identifiers & province only**	Local strip + server `HTTP 400 PII_REJECTED` ; zero request-body logging; nothing retained after answering.
AI prompts (optional)	Firm-approved AI, or none	**Never hosted by us**	AI is optional. Local privacy filter codes SINs, account and policy numbers, street addresses, phone numbers, emails, and the day of birth before text leaves. Client names and the client's story stay readable so drafts make sense, so connect only an AI your firm has approved (or use none at all). Every outbound send is logged locally on disk for branch review.
Licence & billing record	Stripe + Toronto licence table	**Business email hash & key hash only**	No client records linked; card details held by Stripe only (PCI-DSS Level 1); 1-click portal cancellation.
Other outbound	Public timestamp; optional M365; practice backup	**Never client files to us**	Nightly fingerprint (no content) to a public timestamp service; optional Microsoft 365 drafts in the practice's own account; practice's own encrypted backup destination.

Canadian Regulatory Context

- **PIPEDA & Provincial Equivalents:** The practice remains accountable for its clients' information. Advisor Assistant never receives client files. Any AI provider the practice connects is the practice's own service provider, under the practice's agreement with it.
- **Quebec Law 25:** No client file is sent to or stored by Advisor Assistant. The Toronto calculation service receives numbers with no client identifiers (for example: age 62, Quebec, a balance), keeps nothing after answering, and logs no request contents. If the practice connects a cloud AI (or assesses out-of-Quebec processing), the firm's privacy impact assessment covers that choice.
- **Books & Records (Dealer, MGA & Insurance):** Advisor Assistant does not replace your dealer's or MGA's books and records. It keeps your working files on your own disk in ordinary readable formats (notes, data files, PDFs) with a nightly tamper-evident seal, and they stay readable if the subscription ends. Where records are kept, and for how long, follows dealer, MGA, and carrier rules.
- **CSA 11-348 & Insurance Guidance:** Designed to support the human oversight described in CSA Staff Notice and Consultation 11-348 (Dec 2024, guidance, not a binding rule): drafts only, reviewed by a licensed advisor. For insurance business, CCIR/CISRO fair-treatment guidance and your MGA and carrier rules apply.

Four Non-Negotiable Safeguards

- **Drafts Only (Human Approval):** Prepares review briefs, checklists, and plan reports for licensed advisor review. Never sends client email, signs forms, submits applications, executes trades, or moves funds.
- **Dual-Layer Identifier Enforcement (Toronto API):** For the Toronto calculation service, local checks strip names, SINs, account numbers, emails, phone numbers, postal codes, and notes before transmission; the Toronto service independently rejects requests carrying identifiers (`HTTP 400 PII_REJECTED`) and logs no bodies.
- **Optional AI, Your Firm's Policy:** AI is optional and no AI vendor is bundled. Connect an on-device model, a firm-approved Canadian cloud, or no AI at all, governed by a plain-text house-rules file the practice controls.
- **Verifiable 2026 Canadian Math:** 554+ federal and 13-province/territory figures tracked to official CRA, ESDC, and provincial sources. Advisors verify critical figures against official sources before giving advice.

Verification & Branch Supervision Checklist

FOR COMPLIANCE REVIEW

- **Inspectable plain files:** Branch managers and CCOs can open client folders, draft logs, and the local outbound transmission log directly on the advisor's computer with ordinary office tools.
- **No hidden third-party trackers:** The website and local workspace carry zero advertising pixels, zero behavioral analytics, and zero third-party telemetry (Stripe handles payment pages separately).
- **Workstation protection & clear scope:** Advisor Assistant is decision-support software, not legal, tax, or investment advice. Practices should enable BitLocker (Windows) or FileVault (Mac), use strong login passwords, and maintain off-device encrypted backups.