



MORGAN MEIGHEN & ASSOCIATES PRIVACY POLICY

An important part of our commitment to you is respecting your right to privacy. At Morgan Meighen & Associates Limited (“MMA”), personal information collected is kept and treated in the strictest of confidence. With that in mind, this policy was developed to help you better understand how MMA protects, collects, uses and disclose your personal information and describes your right to access your personal information.

Throughout this policy, the terms "**personal information**" or "**information**" means information about an identifiable individual and includes details such as your age, marital status, education, employment history, identification numbers such as SIN number, drivers license or passport, financial or credit information. "**You**" and "**your**" it includes co-applicants on your account(s), guarantors, or personal or authorized representatives. Where reference is made to "**permitted or required by law**" or "**legal and regulatory obligations**" it relates to actions that MMA is permitted or required to take under any laws, guidelines, rules, regulations, or requests of any applicable regulator or self-regulatory organization whose principles MMA has adopted or follows.

Our Privacy Principles

This Policy describes the principles MMA follows to ensure protection of Personal Information when it is collected, used or disclosed in the course of conducting business.

1. Identifying Purposes and Obtaining Your Consent

- We identify the purposes for collecting personal information at or before the time it is collected.
- We obtain your consent before collecting, using or disclosing personal information, except where permitted or required by law.

2. Limiting the Collection, Use and Disclosure of Your Information

- We limit the personal information collected to only the information that is necessary for the purposes we have identified.
- Personal information is not disclosed for any purpose other than those for which it was collected, except with your consent, or where permitted or required by law, and is maintained only for those purposes.

3. Keeping Your Information Accurate and Providing Access to Your Information

- We take care to keep personal information as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- Upon request, we provide you with access to your personal information. You can ask how your information is used or disclosed, can ensure it is accurate and complete, and can update it if necessary.

4. Protecting Your Information

- We safeguard the privacy of personal information through security measures appropriate to the sensitivity of the information.

5. Accountability

- We are responsible for personal information under our control. There are designated individuals within MMA who are accountable for compliance with these privacy principles.
- Information about our policies and practices related to managing your personal information is available to you.
- We have a Privacy Officer available to address any questions or concerns you may have about your privacy.

1. Identifying Purposes and Obtaining Your Consent

We collect, use and disclose personal information about you throughout our relationship so we can:

- Establish your identity;
- Understand and assess your eligibility for MMA products and services;
- Understand your needs to ensure MMA offers appropriate products and services to meet those needs;
- Properly administer the products and services MMA provides, including establishing and maintaining communications with you;
- Protect both MMA and you against errors, fraud or other misrepresentations; and
- Meet legal and regulatory requirements.

If MMA needs your information for any other purpose, we will identify the purpose of its usage. MMA obtains most of your personal information directly from you and through the products and services you use. Some information may be obtained from other sources. For example, with your consent, we may verify some of the information you give us with your employer. Generally, when we obtain information from someone other than you, such as an agent or guarantor, we record the source of that information.

MMA may review and analyze your applications, transactions and other personal information. This may be done in an effort to offer financial solutions that help meet your needs, and to develop strategies to meet those needs. Your personal information may also be used to help us identify various types of risks such as fraud and money laundering.

Your Information is collected, used or disclosed with your consent

Prior to or at the time when you apply for a product or service with MMA, we will tell you about our Privacy Policy and will obtain your consent to collect your personal information. Consent can be expressed or implied and may be given through an authorized representative. Consent can be withdrawn at any time upon written request to the MMA Privacy Officer, subject to legal or contractual restrictions and reasonable notice.

If you have a product or service where ownership or liability is shared with others such as a joint account, we may share your information with them in connection with the product or service. If authorization is given, MMA may provide your information to your lawyer, accountant, or others identified on your Investment Policy Statement. Except as explained in "**Exceptions to obtaining your consent**" under this policy, MMA will not disclose information about you to anyone without your consent. Similarly, if we intend to use your information for a purpose we didn't tell you about previously, we will obtain your consent.

Ways to Obtain your Consent

MMA may obtain your express consent in writing, through electronic means, or verbally. Alternatively, your consent may be implied through an action you've taken or when you continue to use a product or service after we've notified you of a change. In some cases, we are required by law to obtain your express consent, in which case we will ensure that we do so.

Examples of express consent:

- **Written** - You may sign an application that states "I agree to the Terms of this agreement."
- **Electronic** - You may be asked to electronically acknowledge that you will be bound by legal terms or agree to certain statements or activities.

- **Verbal** – You may provide verbal consent to a MMA representative to complete a task.

Example of implied consent:

- **Action you've taken** – If you have a MMA Investment Management Agreement and we inform you about revised conditions for the agreement, we can conclude that you agree to those conditions if you choose to continue using the MMA services.

There are several common consents that may apply in your relationship with us. They are described below to help you understand when you can refuse or withdraw your consent and when this right is limited. Refusing or withdrawing your consent will generally not affect your eligibility for MMA products or services. However, if you refuse or withdraw your consent, we may not be able to provide you with a particular product or service.

2. Limiting the Collection, Use and Disclosure of Your Information

While we collect various types of personal information from you and other sources, we limit the information to what is necessary for the purposes we've identified.

Here are some examples of information we are required to collect to provide our products and services:

"Know your client" information:

We require information to meet our various "know your client" legal and regulatory requirements. For example, we need your name, address, birth date, occupation, citizenship and identification to meet anti-money laundering requirements. We are required to collect information about your investment profile, including your objectives, risk tolerance and investment knowledge as well as the reason for which you will use our products or services.

Financial information:

We require financial information to assess your eligibility for products and services, and to ensure that the advice, products and services offered to you and the investments purchased on your behalf are appropriate for you. Financial information may include account records, tax returns, financial statements, employment income and credit information.

Social Insurance Number:

We may be required to collect and disclose your SIN to comply with legal or regulatory requirements. For example, the Income Tax Act of Canada requires us to ask for your SIN when opening certain accounts.

Using, disclosing and retaining your personal information

MMA does not use or disclose personal information for purposes other than those for which it was collected, except with your consent, or under the circumstances described below:

1. Using an external service provider or supplier

At times MMA may use external suppliers to complete documents involving some of your information. For example, we use a custodian to open accounts and process transactions on our behalf; they may use suppliers to print statements. Before MMA engages a service provider or suppliers, they are carefully vetted to ensure that they have privacy and security standards that meet MMA's strict requirements. In providing services to you, we may share your

information with these providers or suppliers on a confidential basis for customer service and for other reasonable purposes.

2. Where permitted or required by law

There are certain situations where MMA may be compelled to disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where MMA has reasonable grounds to believe that the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information.

It is our policy to release information only to the extent that we are required to do so. For example, Personal Information may be disclosed to:

- Service Providers: members of the financial services industry and related service providers, such as data processors and record keepers that have access to certain Personal Information for the purposes of fulfilling client transactions;
- Intermediaries: such as trustees and custodians;
- Regulatory Organizations: such as applicable Canadian provincial securities regulators.

By opening or maintaining an account with MMA or using MMA's services, a client has consented to the disclosure of his or her Personal Information to a third party in the circumstances or for the purposes described above.

Retain your information

The length of time we keep your information will vary depending on the product or service and the nature of the personal information. We have retention standards that meet customer service, legal and regulatory needs. For these reasons, we may keep your information beyond the end of your relationship with us. When your information is no longer required, we securely destroy it or delete personally identifiable information.

3. Keeping Your Information Accurate and Providing Access to Your Information

We take care to keep the information in our records as accurate, complete and up to date as necessary for the purposes for which it is used. However, we also rely on you to tell us when your personal information changes. If your personal information changes or you discover inaccuracies in your information, please advise your portfolio manager or MMA administrative representative.

You can access your information

Most of your personal information is available to you through your account statements or Investment Policy statement. If you require further information, please request this by contacting your portfolio manager. We will ask that you put your access request in writing and that you provide us with enough specific details in order to help us understand your request and conduct our search for your information. We will need you to verify your identity before searching for or providing you with access to your information. We will respond to your access request within 30 days upon receiving all necessary information, or advise you in writing if we require additional time.

There may be limits on your right to access your information

It may not be appropriate for us to release certain types of information to you. For example, our

records may contain information about other clients, information that is confidential or proprietary to MMA or information that is subject to legal privilege. Because we must protect everyone's confidentiality and legal rights, we cannot make this information available to you. However, where possible, we will suppress this information and provide you with access to the remaining records.

If we are unable to provide access or disclose information to you, we will explain why, subject to any legal or regulatory restrictions.

4. Protecting Your Information

We limit access to your personal information and store it securely on various secure computer systems, the record storage facilities of MMA or our outside suppliers. Access to your personal information is only given to those who require it to provide a products or services, or where permitted or required by law

In addition to the physical and electronic security devices we use to protect your information, we have security standards to protect our computer systems and your information from unauthorized use or access and regularly audit our information security procedures and assess that they remain effective and appropriate.

Employees who have access to your information are made aware of how to keep it confidential. Each employee must sign an agreement stating that maintaining confidentiality is a condition of employment with MMA. Also, each year employees undergo a review of our Code of Conduct and certify they will abide by MMA's ethical and professional standards including the obligation of confidentiality and privacy.

We use contracts and other measures with our outside suppliers to maintain the confidentiality and security of your personal information and to prevent it from being used for any unauthorized purpose.

5. Accountability

MMA is committed to treating you with the greatest respect and consideration and providing the highest level of service. We have procedures in place to assist our employees in complying with this policy, as well as the federal Personal Information Protection and Electronic Documents Act and applicable provincial privacy legislation.

We regularly monitor our procedures and security measures to ensure that they remain effective and that they are being properly administered. Our Chief Privacy Officer is accountable for overseeing compliance with this policy.

If you have any questions about our policies and practices related to managing your personal information that have not been answered in this policy, please contact us at:

Chief Privacy Officer
Morgan Meighen & Associates
10 Toronto Street
Toronto, On
M5C 2B7
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