



## **MORGAN MEIGHEN & ASSOCIATES PRIVACY POLICY**

Morgan Meighen & Associates Limited ("MMA") respects the privacy of its clients and is committed to keeping Personal Information accurate, confidential, secure and private, at a minimum in accordance with governing legislation. The MMA Privacy Policy (the "Policy") is a formal statement of principles concerning the protection of Personal Information collected, used and disclosed by MMA.

"Personal Information" is defined within the Federal Government's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), but in summary, Personal Information encompasses any personally identifiable information about an individual. For example, name, date of birth, address, gender, personal financial records, identification number, including social insurance number, would all be considered Personal Information.

In the course of managing and/or administering investment funds and segregated client accounts, MMA will collect, use and disclose Personal Information in accordance with applicable laws.

The Policy describes the ten principles MMA follows to ensure protection of Personal Information when MMA collects, uses or discloses it in the course of carrying on its business.

### **Ten Principles of Privacy**

#### **1. Accountability**

MMA is responsible for Personal Information in its possession, custody or control. No confidential or non-public information will be disclosed to any external parties without the client's consent, unless such information is required by legal process, statutory authority or in the normal course of providing MMA services and products to the client.

A Privacy Officer has been designated to ensure MMA's compliance with the principles described in this Policy.

#### **2. Identifying Purposes**

The purpose for which MMA collects Personal Information shall be identified before or at the time the client provides such information. Some of the purposes for which MMA collects, uses or discloses Personal Information are to:

- Establish a client's identity;
- Understand and assess a client's eligibility for MMA products and services;
- Understand a client's needs to ensure MMA may offer appropriate products and services to meet those needs;

- Properly administer the products and services MMA provides, including establishing and maintaining communications with a client;
- Protect both the client and MMA against errors and to prevent or detect fraud or other criminal activity; and,
- Meet legal and regulatory requirements.

### **3. Consent**

A client's knowledge and consent is required for the collection, use or disclosure of his or her Personal Information, except where required or permitted by law. 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.

### **4. Limiting Collection**

The Personal Information collected shall be obtained by fair and lawful means, and shall be limited to Personal Information necessary to the client's business dealings with MMA.

### **5. Limiting Use, Disclosure, and Retention**

A client's Personal Information may only be used or disclosed for the purpose for which it was collected, unless the client has otherwise consented, or when it is required or permitted by law. A client's Personal Information may only be retained so long as it is needed for the identified purposes or as required by law.

There are certain situations where MMA will disclose Personal Information to third parties in order to provide effective and efficient services to MMA clients. 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; and
- **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. MMA or third party service provider may utilize Personal Information or an independent identification product that is based on an individual's Personal Information as well as the individual's Canadian credit history for at least a six month duration. This can be a series of specific questions based on an individual's credit file, to verify the client's identification or a cheque drawn on a deposit account.

### **6. Accuracy**

MMA collects Personal Information of its clients in a fair and lawful way and will keep a client's Personal Information in an accurate, complete and up-to-date form as long as it is being used for the purposes set out in this Policy, and provided that the client keeps MMA up to date. Prompt notification of any changes, such as the client's address or telephone number, will help MMA provide the client with the best possible service. Should a client

discover, upon review of his or her Personal Information, that amendments are required, he or she should immediately advise MMA.

## **7. Safeguards**

MMA has taken appropriate measures and put controls in place to protect clients' confidential data. These measures include restricting physical access to MMA offices and records and the use of passwords and encryption for on-line activities. Access to client Personal Information is limited to those employees with legitimate business reason to access the information.

## **8. Openness**

MMA will make available to clients information regarding its policies and practices regarding the management of Personal Information.

Clients may obtain a copy of the current version of this Policy at any time by visiting MMA's website at [www.mmainvestments.com](http://www.mmainvestments.com) or by contacting MMA's Privacy Officer.

## **9. Client Access**

Upon written request, a client has the right to be informed of the existence, use and disclosure of his or her Personal Information and shall be given access to that information, except where restricted by law. A client may verify the accuracy and completeness of his or her Personal Information, and may request that it be amended, as appropriate.

## **10. Client Inquiries and Challenges**

Clients may address a challenge concerning MMA's compliance with the Privacy Principles outlined above or about MMA's practices by contacting MMA as follows:

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

<b>Telephone:</b>	<b>416-366-2931</b>
<b>Toll Free:</b>	<b>1-888-443-6097</b>
<b>Fax:</b>	<b>416-366-2729</b>
<b>Email:</b>	<b>PO@mmainvestments.com</b>
<b>Website:</b>	<b><a href="http://www.mmainvestments.com">www.mmainvestments.com</a></b>

If this fails to satisfactorily resolve your concerns, you may contact the Privacy Commissioner of Canada by writing to:

**The Privacy Commissioner of Canada  
Place de Ville Tower B, 3rd Floor  
112 Kent Street Ottawa, ON K1A 1H3**

**Telephone: 1-800-282-1376  
Fax: 613-947-6850**