

## **Assante Privacy Policy**

As of January 1, 2004, organizations in Canada that collect, use or disclose personal information in the course of commercial activities must comply with the federal Personal Information Protection and Electronic Documents Act (“PIPEDA”). Similar legislation is, or soon will also be, enacted at the provincial level in Quebec, British Columbia, and Alberta.

As required by the legislation, Assante has in place policies and procedures to effectively safeguard confidential information. These apply to all of the operating companies within the Assante group, including Assante Capital Management Ltd., Assante Financial Management Ltd. and Assante Estate & Insurance Services Inc. To meet our obligations, we closely follow the ten fundamental principles set out under PIPEDA.

### **1. Accountability**

Assante has designated a Chief Privacy Officer (“CPO”) who is ultimately responsible for personal information under the control of Assante and is accountable for compliance with the terms and procedures of this Privacy Policy. Any individual who wishes to challenge Assante’s procedures or wishes to make a complaint about Assante’s personal-information handling practices should contact the CPO at 1-888-348-9994 or by email at [privacyoffice@assante.com](mailto:privacyoffice@assante.com). Contact information is set out below. Every complaint will be investigated and where a complaint is found to be justified, Assante will take appropriate measures, including amending our policies and practices, when necessary.

### **2. Purpose of Collecting Personal Information**

Assante believes in collecting and using personal information responsibly and only for the purpose for which it was collected. Assante will identify the purposes for which it collects personal information before or at the time the information is being obtained and will not use or disclose it for any purpose other than those for which it was collected.

Personal information is collected to ensure Assante has all information necessary to:

- operate an account
- provide additional services requested by the client
- properly report account status back to the client
- provide all required tax reporting
- properly discharge our regulatory responsibilities with respect to suitability assessment and other securities rules
- properly discharge our obligations under federal anti-money laundering and suppression of terrorism legislation
- meet our obligations as a member of various self-regulatory organizations

For regulatory purposes, self regulatory organizations, including Market Regulation Services Inc., the Investment Dealers Association of Canada, the Mutual Fund Dealers Association of Canada, Bourse de Montreal Inc., and the Canadian Investor Protection Fund (collectively, "SROs") require access to personal information of current and former clients, employees, agents, directors, officers, partners and others collected or used by Regulated Persons. SROs collect, use or disclose such personal information obtained from Regulated Persons for regulatory purposes, including:

- Surveillance of trading-related activity,
- Sales, financial compliance, trade desk review and other regulatory audits,
- Investigation of potential regulatory and statutory violations,
- Regulatory databases,
- Enforcement or disciplinary proceedings,
- Reporting to securities regulators, and
- Information-sharing with securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

### **3. Client Consent**

Assante's consent form is contained in the New Client Application Form. Consent may also be required when clients purchase a product or service subsequent to account opening. An authorized representative of the client (such as a legal guardian or a person having power of attorney) can give consent. A client may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The implications of withdrawal are set out in the applicable sections of the New Client Application Form.

### **4. Limiting Collection**

Assante collects personal information only to the extent necessary for the purposes identified above. The personal information is collected using only fair and lawful policies and procedures.

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

Assante will use or disclose personal information only for the purpose(s) it was collected, unless the client consents to use or disclosure for another purpose, or if the requires it. Client information on file will be kept for the standard period of seven years from the final closing of the client file, or the date the last service was provided to the client.

The type of information collected is limited to the following:

- the fundamental "know your client" information contained in the Assante New Client Application Form
- information required for tax reporting purposes
- information required to meet anti-money laundering and suppression of terrorism requirements
- other information required to meet obligations imposed by securities regulations, SRO rules or other laws
- This information may be made available to related companies or third-party service providers to fulfil the purposes for which it has been collected. The information may also be disclosed to SROs, which may use the information to review, monitor, audit or investigate Assante's compliance with securities rules. The information provided to the SROs may, in turn, be reported to other securities regulators, regulated marketplaces, other SROs or law enforcement agencies.

## **6. Keeping Information Accurate**

Assante has a responsibility to ensure that all personal information on file is accurate, complete and up-to-date. Clients may, in writing, request that their personal information be amended as appropriate.

## **7. Safeguarding Personal Information**

Security safeguards are in place to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification regardless of the format in which it is held. Assante's safeguards vary depending on the sensitivity of the personal information. The highest level of protection is given to the most sensitive personal information.

## **8. Openness**

Assante ensures that clients have access to information regarding the policies and practices used to manage their personal information. This information is readily available in a variety of formats.

## **9. Access**

Clients may request in writing access to their personal information. Assante will inform the client whether the organization holds personal information and provide an account of the use that has been made of this information, as well as identify any third parties to which the information has been disclosed. When a client demonstrates the inaccuracy or incompleteness of personal information, the information will be amended as required.

## **10. Complaints and Suggestions**

If you would like to make an inquiry, suggestion or complaint regarding Assante's personal information practices, please contact our Chief Privacy Officer at 1-888-348-9994 or by e-mail at [privacyoffice@assante.com](mailto:privacyoffice@assante.com).