

## ***Privacy Policy***

Laurus Investment Counsel Ltd. (“Laurus” or “We”) recognizes the importance of privacy and the sensitivity of personal information received in the conduct of our business. We recognize our professional, ethical and legal obligations to protect the confidential information of our clients. This policy has been prepared with this in mind.

The ***Personal Information Protection and Electronic Documents Act (the Act)*** regulates the way private sector organizations collect, use and disclose personal information. It does not apply to either corporate or not-for-profit organizations and its main objectives are to ensure personal information is used for its stated purpose and such information is safeguarded against unauthorized or illegitimate use.

“**Personal Information**” is defined as information about an "identifiable individual". It does not cover general contact information such as name, title, business address, business phone number, etc.

Personal information collected by us typically includes the following:

- Name and address
- Date of birth
- Social Insurance Number
- Banking information
- Beneficiary name(s)
- Telephone numbers
- E-mail addresses

### **Collection, Use and Disclosure of Personal Information**

We collect Personal Information in order to establish client relationships, create appropriate investment objectives and risk tolerances and to meet certain regulatory requirements.

Such information is used to:

- Establish and administer accounts
- Execute transactions
- Communicate with clients
- Provide reports, tax documents and financial statements
- Maintain records in accordance with regulatory requirements (i.e. Know Your Client and AML rules)

The regulations provide that an individual is deemed to consent to the collection, use or disclosure of personal information if such information is provided to us in documents or communication. By retaining Laurus for Investment Management Services we consider that you have consented to the collection, use or disclosure of personal information necessary to properly represent you. Clients may withdraw consent to the use of personal information by contacting us in writing, however, this may limit the services or products we are able to offer you.

When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate and complete. We are permitted for legal or business purposes, to retain personal information for as long as is reasonable. The regulations also impose obligations upon us to ensure that procedures are in place to destroy the personal information when it is no longer required.

### **Security of Personal Information**

We have implemented security measures and processes to help protect against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. These measures include secured office premises accessible only to authorized employees and maintaining secured network and databases. Furthermore, we protect personal information disclosed to third parties by ensuring that such parties have policies in place to protect the confidentiality of such information.

### **Requests for Access to Personal Information**

Individuals may access personal information maintained by us by submitting a written request to the Chief Compliance Officer. Unless we are specifically prohibited by law, such information will be provided to the individual.

### **Requests for Correction of Personal Information**

Clients may submit written requests to correct errors and to update personal information that is in our custody or control. When provided with a written request, we will:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the personal information but annotate the personal information that a correction was requested but not made.

### **Contacting or Communicating with Us**

If you have any questions with respect to our policies concerning the handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact Laurus' Privacy Officer.

Further information regarding the Act may be obtained by contacting the Office of the Information and Privacy Commissioner at the following address:

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Quebec  
K1A 1H3

If you are not satisfied with the handling of your personal information, we encourage you to contact our Privacy Officer in writing, setting out the reasons for your concern. Additionally, if we are not able to resolve your concerns, you may always contact the Office of the Privacy Commissioner.