# **OUR PRIVACY POLICY AND COMMITMENT TO PROTECTING YOUR PRIVACY**

Aligned Capital Partners Inc. ("ACPI") values your business and we thank you for your confidence in choosing our firm as your source of advice and products. As our client, you trust us with your personal information. We respect that trust and want you to be aware of our commitment to protect the information you share in the course of doing business with us. As an organization that collects, uses and discloses personal information, ACPI is subject to the federal Personal Information Protection and Electronic Document Act (or by similar laws in the provinces of Alberta, British Columbia and Quebec). In complying with these laws, it is important that ACPI provide you with information so that you may fully understand the purposes for which your personal information is collected.

## Your Rights as They Pertain to Your Personal Information

- You have the right to know why an organization collects, uses and/or discloses your personal information.
- You have the right to expect an organization to handle your information reasonably and not to use it for any purpose other than the one to which you consented.
- You have the right to know who in an organization is responsible for protecting your information.
- You have the right to expect an organization to protect your information from unauthorized disclosure.
- You have the right to inspect the information an organization holds about you and ensure it is accurate, complete and current.
- You have the right to expect an organization to destroy your information upon your request and when no longer required for the intended purpose.
- You have the right to confidentially complain to an organization about how it handles your information and to the Privacy Commissioner of Canada if necessary.

### **Consent**

Your consent is required before we may provide your information to any third parties. The consent that you provide to ACPI with regard to collection, use and disclosure of your personal information may be cancelled at any time by providing written notice to ACPI (subject to legal or contractual obligations and on providing us with reasonable notice) by contacting our Privacy Officer. Please be aware that the purposes for which we collect, use and disclose your personal information are central to our being able to provide you with our services. By withdrawing your consent, ACPI will no longer be in a position to provide you with requested products and services. Therefore, by maintaining your account with ACPI, you are providing consent to our collecting, using and disclosing your personal information, as set out in this agreement.

ACPI does not require your consent to the collection, use and disclosure of your personal information:

- Where such collection, use and disclosure is reasonably required in the normal course of providing service to your account;
- For the collection of a debt owed to ACPI by you;
- Where such information is provided to a law enforcement agency, securities regulatory authority, or Self-Regulatory Organization;
- Where such information is provided to legal counsel for the purpose of obtaining advice.

#### How We Collect, Use and Disclose Your Information

When you do business with us, we collect three types of information: personal, non-personal and anonymous. We will obtain personal information about you, which we will keep on file in accordance with industry regulations. Only authorized individuals and entities have access to this information. We assume your consent for our firm to use this information in an appropriate manner. We may use and disclose this information in order to:

- Identify you;
- Communicate with you in a timely and efficient manner;

- Provide you with products and services that best meet your needs;
- Assess your application for investment and other services available to you by our firm;
- Evaluate claims and underwriting risks when required;
- Detect and prevent fraud;
- Analyze business results;
- Act as required or authorized by law.

If you are an individual, ACPI may collect, use and disclose your Social Insurance Number (SIN) for income tax reporting purposes.

ACPI may, from time to time, disclose your personal information to external sources, such as credit agencies, other financial institutions, insurance companies, mutual fund companies in which you invest and other parties who provide services to ACPI. ACPI may also rely on external sources to collect personal information about you.

## What We Will NOT Do With Your Information

ACPI does not disclose your information to any other organization to use for their own purposes. We do not sell client information to, or trade client information with anyone; nor do we share client information with organizations outside of our relationship with you that would use it to contact you about their own products or services.

### **Corrections of Personal Information by ACPI**

You may review the information you have provided to ACPI and make corrections to it. We may request that you provide corrections in writing. You may address corrections, questions, or privacy related complaints to our Privacy Officer:

Brian D Driscoll Chief Compliance Officer Aligned Capital Partners Inc. 3430 South Service Road, Suite 200 Burlington, Ontario, L7N 3T9.

## **Retention of Personal Information**

ACPI may retain your personal information on file after you cease to be a client of ACPI for as long as ACPI requires such information, or as long as is demanded by our regulatory and legal requirements.

#### We Strive to Protect Your Personal Information

All employees, associated advisors, agents and suppliers who are granted access to client records understand the need to keep this information protected and confidential. They know they are to use the information only for the purposes intended. This expectation is clearly communicated. We've also established physical and electronic systems safeguards, along with proper processes, to protect client information from unauthorized access or use.

## BY OPENING AN ACCOUNT AT ACPI, YOU ARE PROVIDING CONSENT TO ACPI TO COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION AS SET OUT IN THIS AGREEMENT.