

## PRIVACY POLICY

Highgate Group Inc. (Highgate) understands that trust is an important factor in our relationship, and we take this very seriously. Protecting your privacy and the confidentiality of your personal information is a fundamental part of our responsibility to you. Through our policies and procedures as well as state-of-the-art equipment and computer security measures, we ensure that your privacy and the confidentiality of your information are protected.

### Collecting, Using and Disclosing Information

Effective January 1st, 2004 Canada's federal privacy law, the Personal Information Protection and Electronic Documents Act (PIPEDA) has come fully into effect. Furthermore, British Columbia has enacted a privacy law, the Personal Information Protection Act (PIPA) which also came into force January 1st, 2004.

The new act requires our clients to give knowledgeable consent to the collection, use or disclosure of his or her personal information.

For regulatory purposes, self-regulatory organizations including the Investment Industry Regulatory Organization of Canada, the Mutual Funds 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 that has been 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.

This section also describes our policies regarding the collection, use and disclosure of the information that we collect about you on our web site such as your name, address, phone number, fax number, e-mail address or mailing address. We may collect this information when you subscribe to any of our marketing and correspondence services, when you fill out forms made available through our web site, and when you e-mail us with inquiries, comments or suggestions.

We will limit the information we collect to what we need for the purposes for which it was collected. If we wish to use your information for any other purpose than set forth in this agreement, we will obtain your consent before using the information. When you send us an email or when you ask us to respond to you by email, we use the email address you sent your message from to acknowledge your comments and reply to your questions unless otherwise specified in your message. As well, we will save your communication and our response in case we correspond further.

We may use your email address to send you educational information or information about products and services you have purchased. If you don't wish us to send this information to you via email you may tell us to stop sending correspondence at any time.

We recommend that you do not send any confidential information or ask for information about your account via email as email is not encrypted or secure. Please contact your investment consultant for additional account information or if you have any questions of a confidential nature

## **Storing of Information and Restricting Access**

We may store your information (in encrypted form where we believe it to be highly sensitive) in electronic databases or e-mail boxes hosted by us or our service providers, for periods of time and with safeguards that we believe are reasonable depending on the nature and sensitivity of the information. Access to the information is restricted to a select group of individuals, in accordance with our security protocols.

## **Releasing Information**

We may provide your information to other persons but only if:

- we have your consent;
- we provide the information to our service providers, suppliers or agents who assist us in serving you and they have agreed to abide by our privacy policy; or
- we are required to do so by law, regulation or court order.

## **Providing Information Access and Accuracy**

If you wish to review your personal information or make corrections, please send a written request to: Chief Privacy Officer, Highgate Group Inc., 1, Place Ville Marie, Suite 1950, Montreal, Quebec H3B 2C3 Canada.

## **Respecting and Responding to Your Privacy Concerns**

You have the option to refuse or withdraw consent to the collection, use and disclosure of your information, and we will respect your choices. If you wish to exercise this option or if you have any questions or enquiries with respect to our privacy policies or procedures, please send a written request to: Chief Privacy Officer, Highgate Group Inc., 1, Place Ville Marie, Suite 1950, Montreal, Quebec H3B 2C3 Canada. We will investigate and respond to your concerns about any aspect of our handling of your information. The Privacy Officer will record your concerns, investigate, and respond to you with their findings. If, unfortunately, we are unable to resolve your concerns, you can address the issue with the Privacy Commissioner of Canada.

You may refuse or withdraw your consent to the collection, use and release of your personal information at any time. Please contact Highgate in writing at the address shown above. Highgate may terminate at its discretion the relationship if in complying with your request we are unable to comply with our regulators and the applicable laws.