

# PRIVACY AGREEMENT

## **1. Collection and Use of Personal Information by Richardson GMP Limited (Richardson GMP)**

When you open an account with Richardson GMP, we will obtain personal information about you, which will be kept on file in accordance with industry regulations. Only authorized individuals and entities have access to this information. The information that we collect allows us to identify you, to protect you against possible fraud, and to assess your potential investment needs so that we may suggest products and services to you, which are appropriate for you, and to comply with legal and regulatory requirements.

## **2. Social Insurance Number**

If you are an individual, Richardson GMP may collect, use and disclose your SIN for income tax reporting purposes.

## **3. Disclosure of Personal Information to External Sources**

Richardson GMP may from time to time disclose your personal information to external sources such as credit agencies, other financial institutions and other parties who provide services to Richardson GMP. Richardson GMP may also rely on external sources to collect personal information about you.

## **4. Affiliated Companies**

Richardson GMP may from time to time disclose your personal information to affiliated companies for the purpose of making related products and services available to you.

## **5. Consent**

Your consent is required before we may provide your information to any third parties. The consent that you provide to Richardson GMP with regards to the collection, use and disclosure of your personal information may be cancelled at any time by providing written notice to Richardson GMP. Richardson GMP 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 Richardson GMP by you,
- To a law enforcement agency, securities regulatory authority or Self-Regulatory Organization,
- To legal counsel for the purpose of obtaining advice.

By opening an account at Richardson GMP, you are providing consent to Richardson GMP to collect, use and disclose your personal information as set out in this agreement.

## **6. Corrections to Personal Information**

You may review the information you have provided to Richardson GMP and make corrections to it. We may request that you provide corrections in writing. You may address corrections, questions or privacy-related complaints to the Chief Compliance Officer, Richardson GMP Limited, 145 King St. West, Suite 300, Toronto, Ontario M5H 1J8.

## **7. Retention of Personal Information**

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

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

## **Privacy Policy – Protecting Your Privacy**

### **Our Privacy Policy**

Our privacy policy informs you of Richardson GMP Limited policies on privacy and the ways that we ensure the protection of your privacy and the confidentiality of your personal information. This policy applies to Richardson GMP's individual clients, including persons who carry on business alone or in partnership with other individuals.

### **Collecting Information**

When we collect information from you, we will explain what information we collect and how we intend to use it. This explanation is set out in the Richardson GMP Privacy Agreement, which is included in the documentation you will receive when you open an account with Richardson GMP.

### **Releasing Information**

We will provide your information to other parties: where we have your consent, where the other parties are our suppliers or business partners who provide service to your account, where we are required to do so by law, and where transfers of our business are involved.

### **Protecting Information**

We will take appropriate steps to protect your information. We will retain your information as long as it is necessary to service your account or as is required by our industry's regulations.

### **Providing Access**

We will provide you with access to your information upon your request. We will take reasonable steps to ensure that your personal information is accurate and up-to-date.

### **Addressing Your Concerns**

We will address and respond to any of your concerns about our handling of your information. If you have any questions or complaints about our privacy policies write to:

Chief Compliance Officer  
Richardson GMP Limited  
145 King St. West, Suite 300  
Toronto, Ontario M5H 1J8

### **Why We Need Your Information**

We ask for a variety of information when you open an account with us. Securities industry regulations demand that we obtain a minimum amount of information about you so that we can provide the proper level of service and supervision to your account. We may also base our recommendations about our products and services to you on the information that you provide to us. For example, we may use your date of birth to identify you, or to determine your eligibility for products or services, which may be of benefit to a certain age group. We require your SIN in order to comply with certain Canada Revenue Agency reporting requirements. We may also use your SIN as a means of identifying you. Industry standards demand that we know your financial information to help us identify products and services which are suitable for you, such as the use of margin in an account.

### **Products and Services**

We will only share your information with others if authorized by you. Your consent to our providing information to other parties is optional and may be withdrawn by you at any time.

### **Third Parties**

With your consent, we may obtain information about you from third parties such as credit agencies. This information helps us assess your eligibility for certain products and services such as a margin account. Please remember that if you do not agree to provide your consent for this, we may not be able to extend margin privileges to you. We may also, with your consent, provide your information to outside sources. For example, service providers who we hire to do things like process your trades and send your month-end statements to you, will have access to certain account information including your name and address in order to perform their required functions. We require our third party service providers to sign a Privacy Agreement to help ensure that they will protect the confidentiality of your information. We are also obliged to provide your information to regulatory bodies within the investment industry. We may also be required to disclose your information to government agencies or law enforcement agencies, or when we are in receipt of a valid Court Order or search warrant. We may also disclose your information to outside sources to help us collect a debt owed to us by you. As well, we may disclose your information as a result of a transfer of our business, should we decide in the future to sell off all or part of our business or to merge with another financial institution.

### **Protection of Information**

We have thorough security standards in place to protect your information against unauthorized access and use. If you access your account through an electronic means (such as online account access), we use passwords that you alone should know. Our internet-based applications that use “cookies” will use only “session cookies”, which means that the cookies will be erased from your computer as soon as your session is over. We also provide training to our employees so they will understand the need for confidentiality when dealing with your information. We retain your information only as long as we need it to service your account, or as long as industry regulations demand. When we no longer need your information, we will delete electronic records and destroy physical records.

### **Your Right to Access Information**

Most of your information is in the form of account documentation and transaction records. You will receive copies of any documents you sign to open your account with Richardson GMP. You will also receive copies of monthly (or quarterly) statements of your account, which detail all of the transactions that have taken place in your account during that period. If you have chosen to have access to your account electronically through online account access, you may also view your account transactions that way. If you require further details about your information, you may contact us at any time. Naturally, we will have to assess your request to ensure that it does not contain references to other persons, or violate our legal privilege.

### **Accuracy of Information**

Having accurate information about you will enable us to give you the best possible service. We expect that you will provide us with updated information when you move or change telephone numbers, or have any other material changes in your information. If you detect any errors in information (such as the information appearing on your copy of your application form), please let us know immediately.

### **Your Right to Withdraw Consent**

When you sign the documentation required to open your account, you will see that within that documentation is our Privacy Agreement. By opening an account with us, you are providing your consent for us to collect, use and release your personal information. If at any time you wish to withdraw this consent, please advise us. However, please note that withdrawing consent may mean that we will be unable to provide certain services to you. We will explain the consequences of withdrawing consent, should you choose to do so.

### **Online Services**

As mentioned previously in this material, we do offer online services through our web site. While we may keep records of which web pages you visit while you are in our web site, or what you may download from our web site, we do so for statistical purposes only. We merely keep track of which pages are visited and do not take or use any personal information from you during your visit to our web site. When you send us

an email, we learn your exact email address as well as any other information you may have included in the email. While we may use your email address to reply to you, we do not make your email address known to anyone outside our firm. We may use your email address to advise you about products or services that may be of interest to you if you have asked us to put you on an email mailing list. You may ask us to remove you from our mailing list anytime by using the "unsubscribe" instructions provided with each email. We may also send certain required information to you via email (such as Shareholder Communication Information) if you have requested that we do so. Again, you may cancel this at any time. Please keep in mind that information sent via email is generally unencrypted, so we would remind you not to send us confidential information via email.