



PRIVACY POLICY

This policy applies to the practices of Patrimonica Advisory and Patrimonica Asset Management.

Respecting and protecting privacy and personal information are fundamental values at Patrimonica since its founding. In the interest of transparency, this policy explains how Patrimonica collects, uses, discloses, retains and destroys personal information.

› [WHEN DOES THIS POLICY APPLY?](#)

This policy applies to Patrimonica's activities, products and services. In other words, it applies to:

- When you invest using Patrimonica's products and services
- When you use our accounting, tax, financial and estate planning services
- When you browse our websites, including the client portal
- With regard to personal information collected on persons involved in the management and administration of the mandates granted, including designated beneficiaries, agents, trusted persons, various advisors, partner and/or spouse, etc.

› [WHAT IS PERSONAL INFORMATION?](#)

Personal information is any information that relates to a natural person and that directly or indirectly identifies that person. For example, name, contact information, residential address, email address, date of birth, account numbers, and financial information are personal information.

› [HOW DO WE COLLECT YOUR PERSONAL INFORMATION?](#)

Generally, Patrimonica collects personal information directly from its interactions with the client, as well as through the account opening form and/or the information gathering form. Patrimonica may also collect information indirectly from third parties or public sources.

› [HOW DO WE OBTAIN YOUR CONSENT?](#)

In General, we require your consent to use and disclose your personal information for the purposes of managing and administering products and services. This policy will apply to a client's information for as long as Patrimonica holds it, including when the client ceases to be a client.

When you provide us with your personal information after reviewing this policy, we will assume that you consent to its use and disclosure as described in this policy. In some cases, we may ask you to express your consent in a specific way.

› [WHAT PERSONAL INFORMATION DO WE COLLECT AND WHY?](#)

Patrimonica collects only the personal information necessary to carry out its product and service offering, to manage its business, and to maintain and establish its commercial relationships.

The categories of personal information collected vary according to the type of products and services provided, and the tax, legal and regulatory context.

Here are the categories of information we collect and the reasons why:

WHAT FOR?	WHY?
IDENTIFICATION AND AUTHENTICATION INFORMATION <ul style="list-style-type: none">Contact details, e-mail address, date of birth, ID information, signature, client account information, etc.).	<ul style="list-style-type: none">Verify your identity, as required by lawCommunicate with youSend information to clients using appropriate means of communication authorized by youProduce and transmit reports, investment, accounting, tax, financial and estate planning information, account statements, financial statements, official receipts, trade confirmations and other communications relevant and necessary to the administration of accounts
INFORMATION ON INTERACTIONS WITH PATRIMONICA <ul style="list-style-type: none">All the information you communicate to our employees and representatives (meeting minutes, written or voice communications, videoconferencing, chat, etc.)	<ul style="list-style-type: none">Respect your communication preferencesMake investments and related decisions, including the electronic or other transfer of fundsReconcile what is in our system with the trustee/custodian transaction report we receive dailyPerform accounting and tax planning mandates
BANKING AND OPERATIONS INFORMATION <ul style="list-style-type: none">Billing addressAccounts number and typeCustodian/depositary nameTransactions historyInvestment instructionsSubscription, redemption, payments received and paid, etc.Assets, liabilities, investment knowledge and objectives, risk tolerance	<ul style="list-style-type: none">Collect and recover fees due to PatrimonicaDetermine your eligibility for certain products and services (investment funds, financial balance sheet, investor profile, professional and financial backgrounds, etc.) and ensure they are suitable for youAnalyze your personal situation to ensure that the products and services offered are appropriate and suitable to the financial profile, financial, tax or estate objectivesEstablish your investor profile according to your financial needs and objectives in order to respect the suitability rule
INFORMATION ABOUT OTHER PERSONS <ul style="list-style-type: none">BeneficiaryPower of attorneySpouse/partnerDependents, etc.	<ul style="list-style-type: none">Carry out your financial, tax and estate planningIdentify, update and verify the authenticity of information provided
HEALTH INFORMATION <ul style="list-style-type: none">Health carePersonal or family medical historyName of health care provider, etc.	
LIFESTYLE INFORMATION <ul style="list-style-type: none">Liquidity needs, travel plans, retirement plans, etc.	

- Property information, insurance contracts, wills, protection (incapacity) warrants, etc.

PROFESSIONAL OR EMPLOYMENT INFORMATION

- Experiences, professional designations, occupation, background, credit experience, conduct record, criminal record, etc.

OTHER INFORMATION REQUIRED BY LAW

- SIN¹, tax identification number, proof of citizenship, proof of residency, etc.

- Fulfill our tax and regulatory obligations (e.g., issue tax slips, comply with FATCA rules, etc.)
- Update personal information contained in client files
- Prevent and detect fraud and unauthorized or illegal activities
- Ensure the security of information, systems and networks
- Comply with tax, legal and regulatory obligations, requirements and guidelines
- Respond to audits and inspections
- Use and disclose certain information where Patrimonica is required or permitted to do so by law

USER INFORMATION

- Name, email address and organization name
- [Examples of usage information: IP address, page views, number of clicks, browsing history, etc.]

- Collect your name and e-mail address in order to communicate with you
- Facilitate navigation and obtain usage statistics, etc.

When you provide us with personal information about a third party, we assume that you are authorized to do so and have obtained that person's consent.

> DO WE USE AUTOMATED COLLECTION TECHNOLOGIES?

To facilitate the use of the Patrimonica website or for future communications, Patrimonica may use cookies to collect information about the Internet connection and how and when you visit the website. The website may also include social media features, such as the share button or interactive mini programs that are operated from the website. Patrimonica's website contains links to other websites that are governed by privacy practices that may be different from those of Patrimonica.

¹ The Social Insurance Number ("SIN") is required for tax purposes, especially if the account generates income and for registered accounts.

> TO WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Patrimonica may share personal information with the following parties or categories of third parties:

WHICH ONES	WHAT THEY DO
Other affiliated entities <ul style="list-style-type: none"> • Patrimonica Advisory • Patrimonica Asset Management 	<ul style="list-style-type: none"> • Help deliver products and services
Agents and subcontractors	<ul style="list-style-type: none"> • Provide applications, data hosting and storage, maintenance, IT support, messaging and other technology services • Destroy and archive certain documents • Administer internal funds • Collect, automate and process certain financial information relating to private placements • Accounting, taxation, financial planning
Financial institutions, custodians, depository, trustees	<ul style="list-style-type: none"> • Receive and send funds • Settle financial transactions • Produce reports, statements and tax slips • Provide other financial services
Various legal service providers	<ul style="list-style-type: none"> • Support/assist Patrimonica in providing financial services • Provide legal advice and recommendations • Analyze legislation • Draft legal and tax documents • Produce important documents (wills, mortgages, contracts, etc.) • Perform and/or audit accounting, financial statements and tax documents • Represent the firm or clients
Various professionals in financial products and services, accounting, taxation, financial and estate planning and corporate administration	<ul style="list-style-type: none"> • Support/assist Patrimonica in providing financial services and reporting • Advise and provide recommendations on accounting, finance or tax matters • Analyze legislation and financial data • Draft documents related to their areas of expertise • Perform and/or audit accounting, financial statements and tax documents • Represent the firm or clients • Define financial objectives and needs • Plan, direct and advise on corporate governance and strategy
Government institutions	<ul style="list-style-type: none"> • Collect and process the required information by the level of government and individual departments

Courts, competent authorities, or certain regulatory bodies

- From time to time, Patrimonica may be required to disclose to the mentioned parties certain information contained in our files

Patrimonica carefully selects all third parties and service providers with whom it does business. Our service providers are committed by confidentiality and privacy agreement. They undertake to use personal information only for the purposes identified in these agreements and to ensure the same level of confidentiality and protection as we offer.

› WHERE IS YOUR PERSONAL INFORMATION STORED?

Physical personal information is stored in Quebec. Digitally stored information is stored on servers located in Canada. Service providers and other third parties to whom we disclose certain personal information may operate outside of Quebec and Canada. In other words, your personal information may be used and stored in other provinces and countries. This means that they may be subject to the laws and access rights of authorities in other provinces and foreign countries.

In such cases, Patrimonica will conduct a thorough investigation of the foreign service provider, in addition to ensuring that the information is adequately protected by signing an agreement, subject to the legal regime of the foreign jurisdiction.

In all cases, Patrimonica will limit the sharing of information to what is strictly necessary and will obtain the consent of its clients when required by law.

Similarly, Patrimonica will not share its clients' information with third parties for any reason other than those mentioned in this policy, unless we have your consent or are permitted by law.

› HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

Patrimonica takes all necessary and appropriate measures to ensure data protection against loss, theft and unauthorized use or modification of the information we hold. Personal information contained in the files are therefore accessible only to designated individuals who consult it only when necessary in the performance of their duties.

Patrimonica deploys significant efforts to protect personal information from loss, theft, unauthorized access, use, disclosure and other security breaches. Patrimonica monitors the evolution of threats to information security. Patrimonica ensures the security of information it holds in a number of ways, including:

- physical measures, such as locked rooms and security systems;
- technological measures, such as firewalls, password management, limiting access to personal information; only employees who need to know certain client information in order to perform their duties have access to it;
- organizational measures, such as the signing of the *Patrimonica Code of Ethics* by all our employees, permanent and temporary, and staff training on the risks surrounding the protection of personal information and cybersecurity.

You also have a key role to play in protecting your information. We encourage you to never share your passwords, codes, personal identification numbers or any other sensitive information.

> HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Patrimonica may, subject to applicable laws, retain your personal information in its files for as long as necessary for the purposes set out in this Policy and in accordance with the retention periods set out in the various laws, even if we no longer have a relationship with you. Several laws require us to retain personal information (for example, under securities, tax and anti-money laundering laws).

Some exceptions may apply and may require longer retention periods, for example, in the event of litigation or claims. When we no longer need that personal information, we destroy it securely.

> WHAT RIGHTS DO YOU HAVE REGARDING YOUR PERSONAL INFORMATION?

ACCESS AND RECTIFICATION	WITHDRAW YOUR CONSENT	ADDITIONAL INFORMATION
<p>You have the right to access the information Patrimonica holds about you.</p> <p>Wherever possible, Patrimonica will ensure that the personal information contained in your client file is up to date before using it to take decisions. However, you may ask us to correct incomplete or inaccurate information or to delete information that is out of date or irrelevant to the purpose of a file.</p>	<p>You may withdraw your consent to the use or disclosure of your personal information. However, the law and certain contractual requirements oblige us to retain certain personal information. If you withdraw your consent, Patrimonica may not be able to provide certain products and services, in whole or in part.</p>	<p>You are welcome to ask us for more information about how we handle your personal information, including what personal information we collect from you, which categories of person at Patrimonica have access to your information, and how long we keep them.</p>

To exercise your rights, simply submit a request to your representative or advisor or contact our Privacy Officer directly at: conformite@patrimonica.com.

We may ask you for identification to verify that it is you. We will respond to your request within 30 days.

> HOW TO CONTACT US?

If you have any questions or complaints about this Policy or our privacy practices, or if you wish to exercise your rights with respect to these, please contact our Privacy Officer at the following address:

PRIVACY OFFICER
conformite@patrimonica.com
1800 McGill College Avenue
Suite 3000 Montréal, QC H3A 3J6

If you have any questions about the laws and regulations governing the protection of personal information, you can contact the *Commission d'accès à l'information* or the *Office of the Privacy Commissioner of Canada* at the following addresses:

COMMISSION D'ACCÈS À L'INFORMATION
2045, rue Stanley
Office 900

Montréal, QC H3A 2V4
Phone: 514-873-4196
Fax: 514-844-6170
Toll Free: 1-888-528-7741
E-mail: cai.communications@cai.gouv.qc.ca

OFFICE OF THE PRIVACY COMMISSIONER OF CANADA

30, rue Victoria
Gatineau, QC K1A 1H3
Phone: 819-994-5444
Toll Free: 1-800-282-1376

› ARE WE GOING TO CHANGE THIS POLICY?

Patrimonica reserves the right to make changes to this policy at any time. If we make material changes, we will notify you in a manner that is convenient to you. Any changes will be effective on the day the revised policy is posted on Patrimonica's website: www.patrimonica.com/privacy