



PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT ("PIPEDA") POLICY

June 20, 2008 – Updated February 4, 2020

Organizations in Canada that collect, use or disclose personal information in the course of commercial activities are required to comply with the federal Personal Information Protection and Electronic Documents Act ("PIPEDA") and any privacy protection legislation which may be in force in a province where the organization operates. Enriched Investing™ ("Enriched") observes the ten principles set out under PIPEDA in the manner set out below.

1. **Accountability:** Enriched is responsible for personal information under its control and has established policies and procedures to effectively safeguard any confidential personal information that Enriched has on file or collects, Enriched has also established procedures to deal with complaints and inquiries should they arise. Enriched has designated a Chief Privacy Officer ("CPO"), who has responsibility for personal information under the control of Enriched; ensuring compliance with the terms and procedures of the policies and procedures; training and communicating to staff information about the policies and practices; and developing information to explain the policies and procedures. If Enriched transfers any personal information to a third party for processing, it will use appropriate contractual or other means to provide a comparable level of protection while the information is being processed by the third party. For information about how to make an inquiry, suggestion, complaint or challenge regarding Enriched's personal information policies and procedures, see heading 10. "Complaints, Challenges and Suggestions" below. Enriched has agreements in place with all of our suppliers/partners to help ensure they protect your personal information. If we believe there has been a breach of privacy by one of our partners, we promptly investigate the matter, correct the situation and put measures in place to try to prevent a similar incident in the future.

2. **Purpose of Collecting Personal Information:** Enriched will identify the purposes for which it collects the personal information before or when it asks for the information. Enriched will not collect personal information, which is not necessary, and will not use or disclose personal information for any purpose other than the purposes for which it was collected. Enriched collects personal information pursuant to its legal and professional obligations to ensure that it has all personal information about its clients necessary and required to:

- a. open and operate a client's account, including the fundamental "know your client" information required by the Enriched account opening and operation forms;
- b. provide additional services requested by the client;
- c. properly report account status back to the client;
- d. provide all required tax reporting, including information required for tax reporting purposes;
- e. properly discharge its regulatory responsibilities with respect to know-your-client, and suitability assessment, including information required to meet obligations imposed by securities laws, regulations, rules and any regulations and rules of self-regulatory organizations;
- f. properly discharge its obligations under federal money-laundering and suppression of terrorism legislation, including information required to meet money-laundering and suppression of terrorism requirements; and
- g. meet its obligations as a member of organizations such as AIMA, which establish standards of conduct and professionalism for the investment management industry.

If personal information is collected for a purpose not previously identified, the new purpose must be identified prior to use. Unless the new purpose is required by law, the consent of the individual is required before the information can be used for that purpose.

3. **Client Consent:** The prior knowledge and permission of an individual client is required for the collection, use or disclosure of the client's personal information. When an individual client delivers account opening documents, including know-your-client information, the client will be considered to have consented to the use of the information delivered for the purposes set forth under heading 2. "Purpose of Collecting Personal Information" above. Consent may be express or implied and may be obtained in a variety of different ways under the legislation (written or verbal). In some cases, we require additional personal information and we will ask for your written consent for the use and collection of this at the time it is collected.

4. **Limiting Collection:** Enriched collects personal information only to the extent that is necessary for the purposes identified above. The personal information is collected using policies and procedures that are fair and lawful.

5. **Limiting Use, Disclosure and Retention:** The type of personal information Enriched collects is limited to the categories described under heading 2. "Purpose of Collecting Personal Information" above. Enriched will use or disclose such personal information only for the reasons it was collected, unless a client provides consent to use or disclose it for another reason, or law requires it. Enriched has procedures in place intended to ensure the information is accurate, stored securely and accessible for inspection and/or correction. Client information on file will be kept for seven years from the later of final closing of the client file, or the date the last service was provided to the client. We may use service providers for specialized services on our behalf. These providers are not affiliated with us and this outsourcing does not require client consent under current law. However, these providers are only given necessary information to perform the particular service. They also must comply with current disclosure law.

6. **Keeping Information Accurate:** Enriched has a responsibility to ensure that all personal information on file for the purposes described under heading 2. "Purpose of Collecting Personal Information" above is accurate, complete and up-to-date. For this purpose, clients may from time-to-time be requested to confirm the accuracy of such information. Clients may, in writing, request that their personal information be amended as appropriate.

7. **Safeguarding Personal Information:** Security safeguards are in place to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification regardless of the format in which it is held. The safeguards applied depend on the sensitivity of the personal information. The highest level of protection is given to the most sensitive personal information.

8. **Openness:** Enriched will ensure that clients have access to information regarding the policies and procedures it uses to manage their personal information. This information is made available in a variety of formats so it is readily available and easy to understand.

9. **Access:** Clients may make a request in writing for access to their personal information. Enriched will inform the client of the client's personal information it holds and provide an account of the use that has been made of this information, as well as identify any third parties to which the information has been disclosed. When a client demonstrates the inaccuracy or incompleteness of personal information, the information will be amended as required.

10. **Complaints, Challenges and Suggestions:** Any individual who requires more information, or would like to make an inquiry, suggestion or complaint regarding Enriched's personal information practices, or to challenge Enriched's compliance with these principles, should contact the CPO at 416-203-3028 or by e-mail at compliance@enrichedinvesting.com. Every complaint or challenge will be investigated and where a complaint or challenge is found to be justified, Enriched will take appropriate measures, including amending its policies and procedures, when necessary.