

## **PRIVACY POLICY**

**Effective July 2, 2008**

Rogerscasey Canada, Inc. (“RCCI”) respects the confidential nature of the personal information that it receives from individuals in order to provide services for them. For this reason, and as required by law, RCCI maintains policies and procedures as follows to protect the confidentiality of personal information.

### **Meaning of Personal Information and Other Terms**

“Personal Information” means any information that RCCI receives about an individual for whom RCCI is providing services, that identifies such person by name and includes information such as Social Insurance Number, address, telephone number or other contact information, age or date of birth, gender, marital status, dependents or relatives, beneficiary, health, employment, finances or credit rating. It specifically includes also any investment holdings and trading activity or history. This policy does not cover aggregated data from which the identity of an individual cannot be determined.

“Client” means the individual to whom the Personal Information relates. “Personnel” means any director, officer or employee of RCCI or its corporate affiliates, and any agent or third party employed by RCCI or any of its affiliates for the purposes of assisting with, or directly providing, services to the Client.

### **Confidentiality of Personal Information**

As further described below, RCCI will treat all Personal Information as confidential to the Client and the individual in question. RCCI shall use its reasonable best efforts to protect Personal Information and keep it confidential, as required by law, and under a standard of care no less than that which RCCI would employ for its own similar confidential information.

### **Acquisition of Personal Information**

Provincial securities legislation requires that RCCI collect particular “Know Your Client” information in order to manage a portfolio of investments for a client. RCCI will request some further information through a questionnaire in order to prepare a custom investment proposal for a client or prospective client. RCCI will then require certain additional details and confirmation before concluding an agreement, opening a managed account, and managing the Client portfolio. This will include all information necessary to properly

identify each Client and the legitimacy of the source of funds, and to comply with Anti-Money Laundering, Anti-Terror, or other such legislation or United Nations Resolutions; and RCCI may seek independent verification solely for this purpose. Personal Information may be in writing or in electronic form; it may be received directly from the Client, or from an advisor or investment dealer engaged by the Client, or from a person to whom the Client has granted authorization. Also, in providing services to the Client, RCCI may generate Personal Information such as security transactions and investment reports.

### **Purposes for Use of Personal Information by RCCI**

RCCI may use Personal Information only for the following purposes:

1. Providing investment advice to the Client, proposing or establishing a personal investment policy, and opening accounts.
2. Managing, and executing or arranging for security transactions in, a Client portfolio within the terms of an agreement with the Client and any investment policy for the portfolio.
3. Administering and reporting on a Client account to the Client and to any other recipient authorized by the Client.
4. Ensuring correctness of Client records.
5. Verifying identity and preventing fraud.
6. Meeting any legal and regulatory requirements.

### **Disclosure of Personal Information to Third Parties**

RCCI shall disclose Personal Information to third parties only as necessary for the purposes set out above. Third parties to whom Personal Information may have to be disclosed for these purposes include:

1. Corporate affiliates of RCCI providing portfolio administration and reporting services.
2. Custodian of Client assets.
3. Broker/dealers employed for trade execution in the Client account.

4. Mutual fund companies, financial institutions, securities dealers, and investment managers when necessary to carry out Client instructions, including the transfer of funds.
5. Investment managers appointed by the Client, or by RCCI under agreement with the Client.
6. Providers of related services, which may include statement preparation and/or delivery, imaging, and document or information storage.

RCCI may disclose Personal Information only to Personnel who have strict “need to know” access to such Personal Information as is reasonably required to provide services to the Client as in the applicable agreement; provided that RCCI shall have issued appropriate instructions to such Personnel and the Personnel have acknowledged this Policy prior to having access to any Personal Information.

Personal information may be subject to transfer to another company in the event of a sale or change of control of all or part of RCCI (the “Business Transaction”). This will occur only if the parties have entered into an agreement under which the collection, use and disclosure of the information is restricted to those purposes that relate to the Business Transaction, including a determination whether or not to proceed with the Business Transaction, and is to be used by the parties to carry out and complete the Business Transaction.

RCCI may disclose Personal Information in order to comply with (i) applicable law (in particular, securities law, and anti-money laundering and anti-terrorist regulations), (ii) subpoena, warrant, or court order, or (iii) if requested by a government institution that RCCI believes has the lawful authority to obtain the Personal Information.

RCCI may transfer Personal Information to its affiliates or third parties in the United States for storage or processing. As a result, it may be possible for governments, courts, or law enforcement or regulatory agencies in the United States to require disclosure of your personal information under applicable United States laws.

Except as required or permitted by law, RCCI shall not directly or indirectly disclose, allow access to or transfer Personal Information to any third party other than the foregoing without the Client’s prior written consent.

### **Security Measures**

RCCI ensures that Personal Information is protected by reasonable security safeguards against such risks as unauthorized access, collection, use, disclosure, inappropriate

alteration or misuse, modification, disposal or destruction. This includes restricting physical access to records and files, and use of passwords and other measures to protect electronically-stored Personal Information.

### **Reproduction, Amendment, Deletion, Access, Retention and Destruction**

RCCI shall copy or reproduce Personal Information, and shall provide such information to service providers, only to the minimum extent that is necessary to most effectively provide the agreed services to the Client.

RCCI shall make all reasonable efforts to amend or delete Personal Information in its possession or control as may be reasonably requested in writing by the Client. However, withdrawal by the Client of consent to the use of Personal Information, or instruction by the Client as to its amendment or deletion, may limit or prevent the provision of services by RCCI to the Client.

On written request by the Client specifying the nature of information required, within 30 days RCCI will provide the relevant Personal Information it then holds respecting the Client.

To guard against unauthorized access, RCCI will require sufficient information to allow it to confirm the identity of the person making the request before granting access or making corrections.

RCCI will retain Personal Information for as long as required to provide the agreed services to the Client, or as required by applicable law or regulation. RCCI may retain Personal Information after the individual has ceased to be a Client, but only to the extent legally required or to reasonably respond to any issues that may later arise.

Once no longer required, RCCI will destroy or cause to be destroyed Personal Information under its power or control.

### **Designated Privacy Officer**

RCCI, has designated a Privacy Officer with primary responsibility for monitoring compliance with, and enforcing, this policy. The Privacy Officer shall also monitor changes in applicable regulation, industry best practices, or Client requests that may require updates to this policy.

If you would like further information about our privacy practices, please contact our Privacy Officer at:



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