



PERSONAL INFORMATION POLICY AND ONLINE PRIVACY POLICY

The Federal Personal Information Protection and Electronic Documents Act (PIPEDA) received Royal Assent on April 13, 2000. This legislation impacts and sets the ground rules for how organizations collect, use and disclose personal information about individuals in the course of commercial activities across Canada. On June 18, 2015, the Digital Privacy Act became law. The Digital Privacy Act applies to every organization to which PIPEDA applies. Most recent amendments to The Digital Privacy Act and PIPEDA were in force as of November 1st, 2018 and include mandatory breach reporting and record keeping. Canada's Privacy Commissioner enforces these two laws - the Digital Privacy Act of 2015 and PIPEDA.

ABC Investments Ltd. ("ABC") is committed to maintaining the highest standards of integrity in its business. ABC's advisors, clients and the third parties with which it does business should feel confident that the Personal Information provided will be kept accurate, confidential and secure. ABC takes the protection of Personal Information seriously and continually reviews its privacy policy and security measures to ensure secure and appropriate methods for the handling of Personal Information.

1. Accountability

In the course of its business, it is necessary for ABC or its employees, consultants, representatives and advisors to record, store, process, transmit, and otherwise handle private information about individuals. Private information includes all information concerning an identifiable physical person ("Personal Information"). This information may include, but is not limited to, name, address, age, marital status, identification numbers (such as your SIN or business number), identification documents, source of funds and references, employment information, and information relating to financial transactions in which the individual has been involved.

All employees, representatives, intermediaries, consultants, advisors and other persons or organizations acting for ABC or on its behalf will be required to conform to this Policy.

2. Why we collect, use and retain you and your clients' personal information.

When you (as our client), or you (as the broker/advisor) or your client (our mutual client) apply for or obtain any product or service from ABC, we need certain personal information from both you, the broker, and from your clients.

The personal information collected from you and/or your client is required primarily for, but may not be limited to, the following purposes: to identify the client and ensure accuracy of personal information, to determine



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eligibility for products and services, to establish and administer the selected products, to provide ongoing service, maintaining and storing account holdings and transaction information in the client record, providing account statements, transaction confirmations, maturity notices and other information which may be requested by the client, financial institution or their associated broker to service the client's account, and to comply with legal requirements, the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and related regulations (PCMLTFR).

The personal information collected about an associated advisor, is required primarily for, but not limited to, the following purposes: administer our mutual agreement, meet legal, regulatory, audit and contractual obligations, for billing and in order to comply with the Canada Revenue Agency's income reporting requirements.

ABC' website, www.abcinvestments.ca, may make use of session cookies and may make a record of each users session on the website. We may require the use of cookies so that our servers can identify a specific user and ensure that only that user sees their information. The information recorded for each user contains such information as their IP address, browser and platform, requested pages, number, time and duration of visits. This information is used for information and statistical purposes, and to provide troubleshooting information for website support. We may share aggregate statistics with our marketing and advertising partners and contractors or consultants to better understand our audience demographics. We do not share information about individual users with any third party without your express consent. In future, we may provide our members with a newsletter service with updates on the latest products, promotions, sales and new additions to the Web site. You may at any time unsubscribe from our newsletters by following the unsubscribe instructions in any E-mail you receive from us.

3. How we collect personal information.

Wherever possible, we collect clients' information directly from the client or their advisor. We may also collect information from you through our authorized representatives or third party service providers. Other sources of information may include other industry related organizations or financial institutions, government and government agencies, or your employer. We will in some cases ask an independent source to verify and supplement personal information.

4. Consent.

Consent may be expressed in writing or be implied. It may be given verbally, electronically, or through an authorized representative.

Consent is required for the collection, use or disclosure of Personal Information, except where required or permitted by PIPEDA or other law. When you or your client apply for a product or service offered by ABC, consent is deemed to be granted. Express consent may be obtained verbally, in writing, or through electronic means. Alternatively, consent may be implied when you or your client request, purchase or continue the use of our financial products or services.



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Refusal to provide us with personal information may limit the products and services available to you and your client. You, the broker or the client may withdraw your consent if you have already provided us with information, however you must give us reasonable notice of the withdrawal of your consent and provide us with your request in writing. We require at least sixty days' notice. This withdrawal may affect our ability to provide you with certain products and we may only do so provided we remain in compliance with legal requirements and regulations.

We can collect, use or disclose personal information without your knowledge and consent in a limited number of instances, in order to: detect and/or prevent criminal activity, collect overdue accounts, comply with legal requirements, and carry out routine banking functions within our organization like data processing. Client information is not publicly available.

5. We will limit the use and disclosure of your clients' and your personal information.

ABC collects, uses and discloses client information provided to us by you and/or our associated brokers only where it is needed to service a particular client's account. We will limit the use and disclosure of your clients' and your personal information within our organization, and to the companies you and your client make application with and to any third party service providers the financial institution has retained and requested we transmit the data to, in order to provide you or your client with the product or service you or your client has requested. We do not give or sell personal information to third parties for marketing purposes.

Information required to purchase a product offered by ABC may be submitted to the issuing financial institution by electronic means, including but not limited to fax transmission, secure data transfer or through industry recognized service providers such as Deposit Broker Services Inc. and the CANNEX Financial Exchanges Ltd. network.

Where information is captured or stored electronically, for the purposes set out above, we may rely on third party vendors who are located outside of Canada. ABC is at all times accountable for your personal information and will ensure that security safeguards and appropriate contractual provisions are in place in order to help protect your personal information from unauthorized access.

ABC is a contracted deposit agent, a Broker, of Deposit Broker Services Inc. ("DBS"). ABC may disclose your personal financial information to DBS, its employees and employees of its subsidiary corporations for the purposes set out above as well as for purposes related to financial reporting, legal affairs, complying with internal audits, facilitating anti-fraud measures and to periodically assist ABC in completing deposit transactions.

The use and disclosure of your clients and your personal information shall be done only to the extent necessary to perform our duties, to provide you with high quality support and gain access to select deposit products, or where such use and disclosure is required by our contractual obligations, and/or to meet our legal and regulatory requirements.



6. We will limit the length of time we retain your clients' and your personal information.

We will keep personal information as long as necessary for the identified purposes or as required by law, even if you cease to be a customer and/or broker.

7. Keeping Your Information Accurate.

We will keep you, your clients and your personal information as accurate, complete and up to date as possible and as necessary. It is your responsibility to notify us if there is any change to you or your client's information so that files may be updated.

You may challenge the accuracy and completeness of the personal information we hold about you and your client and we will make any necessary amendments that we feel are appropriate. If the information has been provided to third parties with your consent, we will convey any corrected information to them as necessary.

8. Security of your clients' and your personal information.

We have developed and continue to enhance security measures and procedures designed to protect the physical, organizational and electronic security of your personal information.

Physical access to areas where information is collected, stored or processed is restricted to authorized employees and agents only. Also, controls exist over computer systems and data processing procedures that are reviewed on an ongoing basis to ensure compliance with our Privacy Policy.

We destroy, erase or make anonymous any personal information that is no longer required to meet legal requirements or serve our stated purposes and use appropriate safeguards in doing so.

9. Your Access To Your Information.

With satisfactory verification of your identity, we will provide you and/or your clients with any information available in our files. If your request is made through a third party, we will need satisfactory proof of your consent and authorization to release information to that party, and we will ensure their entitlement to such information. We will provide the personal information in a timely manner, and for a reasonable cost. We will also provide you with access, upon request, to your own personal information, except in certain situations. We will explain the reason for this lack of access when you make your request. There are certain legal exceptions to your right of access. Should your request fall into such a category, we will inform you of the reason for not providing access and any recourse you may have.

We will not provide certain information if it contains references to other persons, is subject to solicitor-client or litigation privilege, cannot be disclosed for legal reasons or is used for the detection and prevention of criminal activity and dealings in proceeds of crime.



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10 Resolving and Reporting Privacy Issues

All employees, consultants, representatives and advisors have an obligation to report actual or suspected breaches of information security. The Privacy Officer and/or designated support staff will log, report and manage actual and suspected breaches and determine the severity, impact, and complexity and will be reported and managed to ensure necessary follow up and response consistent with the Privacy Commission. Failure to report actual or suspected breaches of information security will be considered a violation of the Privacy Policy.

Questions, complaints and access

If you have any questions or concerns about the use or accuracy of your personal information, please contact the following in writing at:

Privacy Officer

ABC Investments Ltd.

12 Court House Square

Goderich, ON N7A 1M3

P: 519-524-2773

F: 519-524-5802

E: abcprivacyofficer@gicinvest.net