

**TACITA CAPITAL INC.**  
**PRIVACY POLICY AND PRINCIPLES**

The privacy of our investors is very important to us. Tacita Capital Inc. (“Tacita”) is committed to protecting your privacy and maintaining confidentiality of your personal information.

Tacita has put in place policies and procedures to effectively safeguard any confidential information that we have on file or collect. To meet our obligations, we closely follow the ten fundamental principles set out under the federal Personal Information Protection and Electronic Documents Act (“PIPEDA”).

**What is Personal Information?**

The term “personal information” refers to any information that specifically identifies you, including information such as your home address, telephone numbers, social insurance number, birth date, assets and/or income information, employment history and credit information.

**Why we need the information?**

Generally, we need to collect personal information to:

- a) understand your needs, goals, objectives, risk capacity and tolerance and circumstances;
- b) develop appropriate wealth management and investment plans;
- c) manage your investments;
- d) provide ongoing financial advice and service;
- e) meet regulatory and contractual requirements relating to the advice and service provided to you.

**How do we collect your Personal Information?**

We collect and maintain personal information about you when you open an account with us. We collect your personal information to meet legal and regulatory requirements directly from you, members of your family, and other professional advisors or individuals to whom you give consent, that provide you with advice, service and products in connection with your investment needs. Your personal information may be collected from a variety of sources, including but not necessarily limited to the following:

- a) subscription agreements, applications, questionnaires or other forms that you submit to us or contracts that you enter into with us;
- b) account statements, tax returns, insurance policies, employment and stock option agreements, pension and other financial documents supplied to us by you or your other professional advisors;
- c) your transactions with us;

- d) meetings and telephone conversations with you; and
- e) emails and correspondence with you.

We have professional and legal requirements to update certain Personal Information no less than once a year or whenever a material change occurs in your circumstances.

#### **How do we use your Personal Information?**

We collect and maintain your personal information in order to manage your investments, give you advice and service, recommend products and allow us to establish your identity, protect from error and fraud, and comply with the law. In addition, we may use your personal information for:

- a) assessing your suitability for particular investments;
- b) executing transactions on your behalf;
- c) liaising with your other professional advisors;
- d) verifying and correction your personal information; and
- e) providing you and/or your other professional advisors with investment statements, confirmations, tax receipts and other financial information in order to service and administer your account.

#### **Who do we share your Personal Information with?**

We may transfer your personal information, when necessary, to our third party service providers and to our agents in connection with the services we provide related to your account, but they will not share this information with others. Such information is only used for the purposes identified above. Tacita will use contractual or other means to provide a comparable level of protection while the information is being handled by a third party service provider or agent. The following is a list of such third party service providers and agents:

- a) financial service providers, such as investment dealers, custodians, banks and others used to finance or facilitate transactions or operations of your account;
- b) transfer agents, portfolio managers, brokerage firms and similar service providers that may be involved in the planning or execution of your investment strategy;
- c) other service providers such as accounting, legal, or tax preparation services.

We may also share your information with your other professional advisors to whom you consent to such sharing.

We may also be required by law to disclose information to government regulatory authorities (for example, we may be required to report your income to taxation authorities).

We do not sell, lease, barter or otherwise deal with your personal information with third parties.

Tacita may be involved in the sale, transfer or reorganization of some or all of its business or the acquisition of investment businesses at some time in the future. As part of that sale, transfer, reorganization or acquisition, Tacita may disclose your personal information to the organization involved in the sale, transfer, reorganization or acquisition, but will require that organization to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy.

### **How do we obtain your consent to the collection, use and disclosure of your personal information?**

By signing an investment counseling agreement with Tacita and continuing to do business with us, you are consenting to the collection, use and disclosure of your personal information for the purposes identified in this Privacy Policy. Tacita will not, as a condition of the supply of advice, services or products, require you to consent to the collection, use or disclosure of your personal information beyond that required to fulfill those purposes.

### **Can you withdraw your consent?**

You may withdraw all or part of your consent for us to collect, use or disclose your personal information subject to legal restrictions and reasonable notice. Tacita will inform you of the implications of such withdrawal of consent for the continued provision of advice and services.

### **How do we safeguard personal information?**

We carefully safeguard your personal information and, to that end, restrict access to personal information about you to those employees and other persons who need to know the information to enable us to provide services to you. Tacita's employees are responsible for ensuring the confidentiality of all personal information they may access. Annually, each of Tacita's employees is required to sign an acknowledgement confirming their adherence to Tacita's policies and procedures including the Privacy Policy and Principles.

### **What are your rights?**

You have the right to ask whether we hold any personal information about you and to see that information, as provided by law.

If you believe any of the information we have collected about you is incorrect or incomplete, you have the right to ask us to change it and we will make the necessary changes. If you feel we have not dealt with your request to your satisfaction, you can follow our complaint resolution procedures.

### **How to obtain more information or register a complaint?**

You may register a privacy-related complaint by contacting Tacita's Privacy

Officer at Suite 700 - 90 Adelaide Street West, Toronto, Ontario, M5H 3V9 or by email to: [info@tacitacapital.com](mailto:info@tacitacapital.com) - Attention: Privacy Officer.

## **Tacita's Privacy Principles**

### **Principle 1 - Accountability**

Each employee of Tacita is responsible for personal information under his or her control and is accountable for the prudent and proper use of this information. Tacita has designated a Privacy Officer who is accountable for our compliance in accordance with our Privacy Policy and Principles.

### **Principle 2 - Identifying Purposes**

The purposes for which personal information is collected shall be discussed with you before or at the time the information is collected.

### **Principle 3 - Consent**

The knowledge and consent of our clients is required for the collection, use or disclosure of personal information, except for legal or security reasons.

### **Principle 4 - Limiting Collection**

Only such information as is necessary for Tacita's services will be collected from you. Personal information shall be collected by fair and lawful means.

### **Principle 5 - Limiting Use, Disclosure and Retention**

Personal information will not be used, disclosed or retained for purposes other than those for which the information was collected, except with the consent of the individual, or as permitted or required by law.

### **Principle 6 - Accuracy**

Personal information shall be as accurate, complete and current as is necessary for the identified purposes for which it is to be used.

### **Principle 7 - Safeguarding Information**

Personal information will be protected by safeguards appropriate to the sensitivity of the information.

### **Principle 8 - Openness**

Tacita will be open about its policies and procedures with respect to the management of personal information. Tacita will ensure that individuals are able to acquire information about Tacita's policies and procedures without unreasonable effort. Tacita will make this information available in a form that is generally understandable.

### **Principle 9 - Individual Access**

Upon written request, an individual will be informed of the existence, use and disclosure of his or her personal information and shall be given access to it,

except where the law requires Tacita to deny access. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

**Principle 10 - Handling Customer Complaints and Suggestions**

Individuals can address any complaint regarding compliance with the above principles with our Privacy Officer.

This Policy may be updated from time to time without notice.