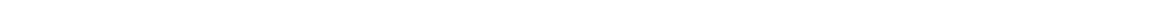




# Policy

## Confidentiality

CREATED : OCTOBER 2009  
LAST REVIEW : OCTOBER 2021



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## 1. Our Commitment

At Addenda Capital, we have always made it a priority to protect our client's personal information. Our standard of excellence extends to the principle of confidentiality. In order to protect the information, we obtain from clients, we have implemented a Confidentiality Policy in the day-to-day business of the Company.

## 2. Why We Collect Information?

We collect personal information to ensure that we provide services that suit your needs and your situation. We only collect necessary information to meet that goal and to comply with applicable laws and regulations.

Your personal information is kept confidential and secure, and it is not shared to any other party except our business associates and partners, without your consent, unless required by law.

## 3. What Information Do We Collect?

We collect personal information, as follows, that we require to conduct our business, but without limitations:

- Personal information required to open an account.
- All documents needed to comply with money laundering and terrorism legislation.
- Information required to comply with various security legislation.
- All other relevant information to make sure that we are serving you well and offering you the proper services to meet your needs.

## 4. Who Has Access to this Information?

Addenda Capital respects your privacy and shall not share its mailing lists with third parties. Only the following persons have access to your personal information:

- Employees of Addenda Capital who are responsible for administrative tasks related to your accounts and those who will serve you in the future;

- All sub-contracting agencies (affiliated entity or third party service provider) we deal with for administrative support and with which we have a privacy agreement. Where your personal information is disclosed for example in a foreign jurisdiction, such as the United States, it may become subject to the laws of that jurisdiction;
- All individuals duly authorized by law or by a court to have access to such information;
- All individuals expressly designated by you;
- Employees of audit firms responsible to perform an audit regarding our activities and with whom we have privacy agreements.

## 5. How Do We Keep this Information?

We keep the information at our offices, either on paper or in electronic files, and no longer than the necessary period prescribed by law. We ensure that the information is properly stored and that only the above-mentioned parties have access to it.

## 6. How to Access Your Information?

### Request for access to information

It is your right to consult your personal information, and update or amend it, if necessary. Such requests should be made in writing to:

Addenda-Capital Inc.  
C/O:Chief Compliance Officer  
800 Rene-Levesque Blvd West, Suite 2750  
Montreal (Quebec) H3B 1X9

## 7. Complaints

If you believe that your personal information has not been treated in compliance with this policy, we invite you to contact our Legal Services Department.

## 8. Amendments and Reviews

Date of Modification	Amendments/Reviews
October 2009	Creation
June 2014	Amendment
June 2019	Review
October 2021	Review