



Pier 21 Privacy Notice

1. Introduction

Pier 21 Asset Management Inc. (also referred to as “**Pier 21**”, “**we**” or “**us**”) understands and respects the importance of the Personal Information we collect to manage our business and maintain commercial relationships. Pier 21 has developed the present privacy notice (the “**Notice**”) to explain how we collect, use, and disclose (“**Process**”) information about identifiable individuals (“**Personal Information**”) such as you. This Notice also describes your Personal Information protection rights and how to exercise them.

2. Notice Requirements

2.1 *Accountability: Who is Responsible for my Personal Information?*

Pier 21 is responsible for the Personal Information we Process. We have appointed a Chief Compliance Officer (“**CCO**”) to oversee our compliance with applicable Personal Information protection legislation.

2.1.1 Pier 21 Contact Details

Pier 21 Asset Management Inc.

1751 Rue Richardson,

Montréal, QC H3K 1G6

(514) 397-4027

2.1.2 Contact details of our CCO

Compliance@pier21am.com

2.2 *What Personal Information do we Process?*

We Process the following Personal Information:

- (a) **Identity and contact information:** including your name, physical address, email address, telephone number, date of birth, marital status, passport number, tax status, job title and function.
- (b) **Financial and payment information:** including your bank account and other information necessary for Processing payments and fraud prevention.

Please note: If you provide Personal Information to us about anyone other than yourself, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

2.3 Why do we Process your Personal Information?

Pier 21 Processes your Personal Information to manage our business and to maintain and develop commercial relationships. We only Process such information as is necessary for those purposes. If we are required to Process your Personal Information for a purpose that differs from the purposes described herein, we will obtain your consent before doing so except in those circumstances set out in Section 2.8 of the Notice.

Purposes for which we Process Personal Information are as follows:

- (a) To execute any obligations arising from a contract entered into between us and you or to take any steps linked to a contract, with you. This includes:
 - (i) *to register you as a client;*
 - (ii) *to provide and administer our services or other services or solutions, as instructed by you;*
 - (iii) *to administer and manage our relationship with you, including accounting, auditing, and taking other steps linked to the performance of our business relationship including identifying persons authorized to represent our clients, suppliers or service providers; and*
 - (iv) *to Process payments, billing and collection.*
- (b) As required by us to conduct our business and pursue our legitimate interests in particular:
 - (i) *to provide our services and to respond to and address any questions or concerns relating to our services;*
 - (ii) *to analyse and improve our services and communications and to monitor compliance with our policies and standards;*
 - (iii) *to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities;*
 - (iv) *for insurance purposes; and*
 - (v) *to collect information about your preferences to personalize and improve the quality of our communications with you.*
- (c) As required by us to conduct marketing or other promotional activity including to communicate promotional material to which you may unsubscribe.
- (d) As required to comply with any legal duties or to take legal action including:
 - (i) *to protect our rights and safety as well as that of any third parties;*

- (ii) *to comply with any legal requirements or court orders;*
- (iii) *to prosecute and defend a court, arbitration, or similar proceeding;
and*
- (iv) *to communicate this information to any advisors who assists us in
complying with legal, accounting, or security requirements.*
- (e) as otherwise permitted by law.

We will not use your Personal Information for taking any automated decisions affecting or creating profiles other than as described above.

We will not use Personal Information for a purpose other than for which it was collected except with your consent unless:

- (a) legal, medical or security reasons make it impossible to obtain consent; or
- (b) Pier 21 is permitted or required to do so by applicable laws.

2.4 How do we collect your Personal Information?

The circumstances in which we may collect Personal Information about you include:

- (a) when you seek advice from us or use any of our online client services;
- (b) when your Personal Information is provided to us by a third party because you are the subject of, or your information is otherwise included in, advice we are asked to provide to that third party;
- (c) when you correspond with us by phone, email or other electronic means, or in writing, or when you provide other information directly to us, including in conversation with our employees;
- (d) when you browse, complete a form or make an enquiry you are willingly providing information which could be included in the collection of Personal Information. Depending on the circumstances, this may include Personal Information such as, but not limited to, physical mailing address, personal email address, phone number(s), and other details like gender, occupation, and other demographic information. More information on how our website Processes Personal Information can be found in section 2.7 below; and
- (e) when you attend our seminars or other events or sign up to receive information from us.

2.5 What Happens if I don't Provide my Personal Information?

Where we need to collect Personal Information by law or in order to Process your instructions or perform a contract we have with you and you fail to provide that Personal

Information when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

2.6 How much Personal Information do we Require?

Pier 21 limits the Personal Information we Process to what is necessary for managing our business and maintaining and developing our commercial relationships.

2.7 How is your Personal Information Processed when using our Website?

Although Pier 21 does not typically monitor the use of our internet site, our email marketing communications, that are managed by MailChimp, may contain a single, campaign-unique "web beacon pixel" to tell us whether our email is opened and combined with other technology verify any clicks through to links within the email. We may use the information for purposes including determining which of our email is more interesting to you and to query whether users who do not open our email wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, through email you can opt not to download images from Pier 21. To find out more about MailChimp's privacy policy please follow the link at: <https://www.intuit.com/privacy/statement/>.

You may also choose not to click in the email marketing communications that we send you. This information may be connected to your personal identity.

2.8 Do we Share your Personal Information?

Pier 21 shares your Personal Information only in the following circumstances and with the following recipients:

- (i) with third-parties including certain service providers we have retained in connection with the financial services we provide, such as attorneys, consultants, or experts;
- (ii) If we have collected your Personal Information in the course of providing services to any of our clients, we may disclose it to that client, and where permitted by law to others for the purpose of providing our services;
- (iii) on a confidential basis with third-parties for the purpose of collecting your feedback on our service, to help us measure our performance and to improve and promote our services;
- (iv) with companies providing services for money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such Personal Information is shared;

- (v) with courts, law enforcement authorities, regulators, government officials or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;
- (vi) with service providers who we engage within or outside of Quebec, domestically or abroad, (e.g. shared service centres), to Process Personal Information for any of the purposes listed above on our behalf and in accordance with our instructions only; and
- (vii) if we engage in a commercial or business transaction - as defined by applicable data protection legislation - in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets to whom we assign or novate any of our rights and obligations.

Please note: Pier 21, its third-party service providers and other third parties to whom we disclose information under the Notice may perform activities outside of Canada.

Any Personal Information that is Processed in countries outside of Canada may be subject to the laws of those countries (e.g. where a third party service provider operates internationally). As a result, Personal Information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement officials in countries outside of Canada.

You may seek additional information regarding the Processing of your Personal Information outside of Canada by contacting our CCO at the contact details found in Subsection 2.1.2 above.

2.9 How long do we Retain your Personal Information?

We will not retain Personal Information longer than is necessary to fulfil the purpose for which it was collected including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for us to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. As this purpose varies depending upon the Personal Information involved, we invite you to contact our CCO for any inquiries pertaining specifically to you.

Upon expiry of the applicable retention period we will securely destroy your Personal Information in accordance with applicable laws and regulations and with our Data Retention Policy.

2.10 How do we Ensure your Personal Information is Accurate?

Pier 21 uses reasonable efforts to ensure that your Personal Information is kept as accurate, complete and up to date as possible. We do not routinely update your Personal Information,

unless such an update is necessary. To help us maintain and ensure that your Personal Information is accurate and up to date, you must inform us, without delay, of any change in the information you provide to us.

2.11 How do we Safeguard your Personal Information?

Pier 21 is committed to protecting the confidentiality, integrity, and availability of your Personal Information. We employ security safeguards that are customary in the financial sector and appropriate to the sensitivity of the information, including physical, organizational, and technological measures. Examples of such measures include restricted access to offices, training of personnel, limiting access to information on a "need-to-know" basis, using passwords and well-defined internal policies and practices.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of data transmitted to our internet site. Any transmission you provide is at your own risk. Once we have received your information, we will apply our security practices to try to prevent unauthorized access, use and/or disclosure.

We may store and Process your Personal Information at our offices in Montreal. We use contractual and other means to provide a comparable level of protection while information is being stored, handled, and Processed using any third party service providers.

2.12 Whom to Contact with Questions

Pier 21 is committed to being transparent about our policies and invites you to contact the CCO with any question you may have or to visit our website.

2.13 What are your Rights?

Depending upon the province in which you reside, you have various rights with respect to our Processing of your Personal Information:

- (a) **Access:** You have the right to request whether we hold Personal Information on you and to request a copy of such information. To do so, please contact us at Compliance@Pier21am.com. There are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal Personal Information about another person, or if we are legally prevented from disclosing such information.
- (b) **Accuracy:** We aim to keep your Personal Information accurate, current, and complete. We encourage you to contact us at Compliance@Pier21am.com to let us know if any Personal Information is not accurate or changes, so that we can update your Personal Information.
- (c) **Withdrawal of Consent:** If you have provided your consent to the Processing of your Personal Information, you have the right to fully or partly withdraw your consent. To withdraw your consent please follow the opt-out links on any marketing message sent to you or contact the CCO at

Compliance@Pier21am.com. Once we have received notification that you have withdrawn your consent, we will no longer Process your information unless there is another legal ground for the Processing. Withdrawal of consent to receive marketing communications will not affect the Processing of Personal Information for the provision of our services.

- (d) **Cessation of Dissemination:** You have the right to request that we cease disseminating your Personal Information if the dissemination is contrary to the law or a court order.

You also have the right to request that we cease disseminating your Personal Information where the following conditions are met:

- (i) the dissemination of the information causes you serious injury in relation to your right to have your reputation or privacy respected;
- (ii) *the injury is clearly greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and*
- (iii) *the cessation of dissemination requested does not exceed what is necessary for preventing the perpetuation of the injury.*

- (e) **De-indexation:** You have the right to request that we de-index any hyperlink attached to your name that provides access to information by a technological means if the dissemination is contrary to the law or a court order.

You also have the right to request that we de-index a link providing access to information where the following conditions are met:

- (i) *the dissemination of the information causes you serious injury in relation to your right to have your reputation or privacy respected;*
- (ii) *the injury is clearly greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and*
- (iii) *the cessation of dissemination requested does not exceed what is necessary for preventing the perpetuation of the injury.*

- (f) **Re-indexation:** You also have the right to request that we re-index a link providing access to information where the following conditions are met:

- (i) *a failure to do so causes you serious injury in relation to your right to have your reputation or privacy respected;*
- (ii) *the injury caused by a failure to re-index is greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and*

- (iii) *the re-indexation requested does not exceed what is necessary for preventing the perpetuation of the injury.*
- (g) **Mobility:** You have the right to request that computerized Personal Information collected from you be communicated to you in a commonly used technological format as well as to any person or body authorized by law to collect such information. This right does not extend to information that was created or inferred from your Personal Information and we are under no obligation to communicate such information if doing so raises serious practical difficulties.
- (h) **Complaints:** If you believe that your Personal Information protection rights may have been violated, you have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts.

2.13.2 Access to Information

You may enquire about or exercise your right to your Personal Information by contacting our CCO at Compliance@Pier21am.com.

Pier 21 will generally respond to all access requests within 30 days of the receipt of all necessary information. In circumstances where we are not able to provide access, or if additional time is required to fulfill a request, we will advise you in writing.

We may not release certain types of information based upon exemptions specified in applicable laws. Where possible, we will sever the information that will not be disclosed and provide you with access to the remaining information. Should we be unable to provide access to or disclose Personal Information to you, we will provide you with an explanation, subject to restrictions.

In certain circumstances, such as where the request is excessive or unfounded, we may charge you an administration fee for access to your Personal Information. We may also charge for additional copies. We will advise you of any fees before proceeding with a request.

2.14 How do we Resolve your Concerns?

Any report, concern, complaint or incident of which we become aware that involves conduct that may contravene the Notice will be treated confidentially to the extent possible. However, some disclosure may be necessary to adequately address issues raised, aid enquiry and implement solutions, as appropriate.

2.14.1 Incident Reporting and Escalation Process

We take all potential or actual Personal Information breaches seriously.

You may report your concerns about the Processing of your Personal Information directly to our CCO.

The CCO will engage the appropriate levels of management to assist with resolution of the issue.

2.14.2 Alternative Actions

While we are committed to resolving all Personal Information matters internally, nothing in the Notice precludes you from contacting the appropriate federal or provincial privacy commissioner.

2.14.3 Prohibition Against Retaliation

We will not retaliate against a Person who, in good faith and on the basis of reasonable belief, raises questions or concerns regarding their Personal Information.

3. Maintenance and Review

The Notice is effective **September 18, 2023**, and supersedes all prior versions.

Pier 21 reserves the right to interpret the Notice at its sole discretion and to make changes as it deems appropriate from time to time without the requirement of advanced notice.

Personal Information protection legislation continues to evolve and, as a result, this Notice may be amended by us from time to time at our full discretion without any prior notice or liability to you or any other persons. The Processing of your Personal Information by us will be governed by the version of this Notice in effect at that time.