

PRIMEVEST CAPITAL CORP.

PRIVACY POLICY

Last Updated: June 27, 2023

INTRODUCTION

Your privacy is important to Primevest Capital Corp. (“**Primevest**”, “**we**”, “**us**” or “**our**”). This Privacy Policy explains how Primevest collects, uses, discloses and retains personal information about its clients, investors in funds it manages and other individuals, including through its account applications, website, marketing activities, and other communications. In this Privacy Policy, we refer generally to the various products and services that we offer, and related activities described above as our “**products and services**”.

KEY TERMS OF OUR PRIVACY POLICY

- **How you provide your consent?** For a description of how you provide your consent to the collection, use, disclosure and retention of personal information, please see Section 2 of this Privacy Policy.
- **What personal information does Primevest collect and how do we collect it?** For a description of what personal information Primevest collects and how, please see Section 4 of this Privacy Policy.
- **How does Primevest use your personal information?** For a description of how Primevest uses your personal information, please see Section 5 of this Privacy Policy.
- **How does Primevest disclose your personal information?** For a description of how Primevest discloses your personal information, please see Section 6 of this Privacy Policy.
- **How can you update your privacy choices?** For a description of how you may withdraw your consent to Primevest’s collection, use, disclosure or retention of your personal information, please see Section 7 of this Privacy Policy.

TABLE OF CONTENTS

1. Application
2. Your Consent
3. Personal Information
4. How Primevest Collects Personal Information
5. How Primevest Uses Personal Information
6. How Primevest Discloses Personal Information
7. Your Right to Withdraw Consent
8. Location of Personal Information
9. Retention of Personal Information
10. Accuracy and Access to Personal Information
11. Protection of Personal Information
12. Non-Personal Information
13. Other Websites and Businesses

14. Children and Personal Information
15. Disclaimers, Liability Exclusions/Limitations and Disputes
16. Changes to this Privacy Policy
17. Inquiries or Complaints

1. APPLICATION

We are required to collect, use and maintain certain personal information about you in connection with the provision of our products and services. This Privacy Policy applies to your use of our products and services, and is in addition to any client agreements governing your investment.

In some cases, at the time of collection of your personal information, we may provide you with additional information regarding the handling of your personal information.

This Privacy Policy applies only with respect to personal information that is collected by or on behalf of Primevest. This Privacy Policy does not apply to personal information that our service providers or agents collect on their own behalf or for their own purposes.

2. YOUR CONSENT

By providing Primevest or its agents acting on behalf of Primevest with your personal information, you consent to the collection, use, disclosure and retention of that information by or on behalf of Primevest in accordance with this Privacy Policy and as otherwise permitted by applicable law. We may also obtain your specific consent in certain circumstances to use or share your personal information, including where required by law.

You may withdraw your consent at any time, subject to legal or contractual restrictions and on reasonable notice to Primevest, but then you might not be able to proceed with your intended interactions or transactions with Primevest or otherwise receive the full benefit of our products and services. More information about your options with respect to the withdrawal of your consent is set out in Section 7 of this Privacy Policy.

In addition, where permitted by applicable law, Primevest or its agents acting on behalf of Primevest may collect, use, disclose and retain your personal information without your consent.

3. PERSONAL INFORMATION

In this Privacy Policy, “**personal information**” means information about an identifiable individual (a natural person), but does not include (to the extent permitted by applicable law) information that is publicly available in a telephone directory, business contact information that enables an individual to be contacted at a place of business, and other kinds of information that are not subject to regulation by Canadian personal information protection or privacy laws.

4. HOW PRIMEVEST COLLECTS PERSONAL INFORMATION

a) Information You Provide

You may be asked to voluntarily give your personal information to Primevest, directly or indirectly through our agents. For example, when you make an investment in a Primevest investment product or establish a private managed or other account with us, we collect the following types of information:

- information you provide on your account application or other forms, such as your name, mailing address, telephone number, email address, social insurance number, date of birth, employment

information, spousal information, financial and net worth information, and banking information;
and

- information about your assets, investments and transactions with us.

You may also be asked to provide your personal information to Primevest at other times when you are in contact with Primevest, including when you send Primevest an email, when you register or subscribe for Primevest's newsletters or promotions, and when you contact Primevest representatives.

In some circumstances, you may choose not to provide certain requested personal information, but then you may not be able to purchase products or services, or access or use certain features of Primevest's website, or otherwise receive the full benefit of our products and services.

If you give Primevest the personal information of another individual, then you are solely responsible for complying with all applicable laws, including obtaining the individual's valid consent, regarding your collection and disclosure of the personal information to Primevest and to Primevest's collection, use, disclosure and retention of the personal information.

b) Automated Collection/Cookies

Primevest may use technologies to automatically collect certain information regarding your use of the Primevest website, such as the dates and times that you access a Primevest website, general geographic location, the browsers, operating systems, software, devices and networks that you use to access the website and details of your use of the website.

Primevest's website, online services, email messages, and advertisements may also use technologies (e.g., cookies, web beacons, tokens, pixels or tags) to automatically collect information that assists Primevest to improve its products, services, client communications and advertising and to prevent fraud.

Some of the information automatically collected by technological means is non-personal information (because the information does not identify you), and Primevest will deal with that non-personal information as explained in Section 12 of this Privacy Policy unless applicable law requires otherwise.

c) Information from Other Sources

Primevest may collect personal information from various third party sources (including service providers), from publicly available sources, and from consumer-reporting agencies (including credit bureaus used by us when we engage in debt collection activity).

5. HOW PRIMEVEST USES PERSONAL INFORMATION

a) General

Primevest may use your personal information for various purposes in connection with its relationship with you and to provide product and services to you (including transactions with you or on your behalf) and as otherwise set out in this Privacy Policy or permitted by applicable law, including during the account opening and account administration process:

- to open, maintain and administer your account in compliance with applicable law;
- to verify your identity and protect against fraud;
- to provide you with and manage the services you have requested;
- to determine your eligibility for certain of our services and special offers;
- to improve our services to you; and

- to comply with, and monitor compliance with, applicable law.

For example, we collect your social insurance number in order to meet certain investment income and tax reporting requirements under the *Income Tax Act* (Canada), to keep your information separate from that of other clients with whom you may share a similar name, and to comply with applicable legal and regulatory requirements. We collect your birth date to help us verify your identity and guard against impersonation. We collect only the personal information we need or are required or permitted by law to collect, and use it only for the purposes for which it was collected.

Subject to your right to withdraw consent as described in this Privacy Policy, Primevest may also use your personal information collected by Primevest for the following additional purposes that are not required for Primevest to provide you with services:

- to communicate with you for the purposes of providing you with monthly performance data, quarterly commentary and advertising and marketing messages pertaining to additional products or services that may be of interest to you.

Primevest may transfer your personal information to its suppliers and service providers to assist Primevest in the provision of our products and services to you, to provide services to Primevest, to assist Primevest to use your personal information (e.g., providing marketing campaigns, promotional activities, analytic services and metrics, data hosting, fulfilment of the offer or provision of the service) as set out in this Privacy Policy and as otherwise permitted by applicable law.

Primevest may combine your personal information collected by or on behalf of Primevest through the various sources described in Section 4.

Primevest may use your personal information to create non-personal information (i.e., information that does not identify you, directly or indirectly), and Primevest may then use, disclose and retain the non-personal information as set out in Section 12.

b) Information Collected by Technological Means

Primevest may use information collected by technological means to recognize you as a user of Primevest's website, to facilitate and improve your use of Primevest's website and to confirm that messages have been delivered to and opened by you. Primevest may use web beacons, pixels or gif tags and action tags to confirm that email messages have been delivered and opened. You may opt out of receiving emails or other commercial electronic messages in accordance with this Privacy Policy.

Information provided by cookies may be collected and processed by Primevest or by its third party service providers, including Google.

You may choose to decline or disable cookies if your web browser or device permits, but doing so may affect your ability to access or use certain features of a website. Information about how Google uses cookies and how you can limit or disable certain kinds of cookies on your personal computer or mobile device is available here:

<https://www.google.com/policies/privacy/partners/>
<https://www.google.com/policies/technologies/ads/>

6. HOW PRIMEVEST DISCLOSES PERSONAL INFORMATION

Primevest does not sell your personal information to third parties. Primevest does not disclose your personal information to third parties other than in the following circumstances or for the following purposes:

- **General.** In connection with normal business operations to open, maintain, administer or service your investment account, including without limitation for purposes of facilitating the account opening process (including the mailing of account opening materials and the scanning of account documentation, cheques and related materials into client databases), the provision of client service (including services rendered by third party agents or affiliates), the provision of back office administrative services (including the mailing of transaction confirmations and account statements, and record-keeping services), for audit or statistical purposes, or for the collection of any debt owed by you in respect of your investment or account;
- **Affiliates.** To entities within the Primevest group of corporate affiliates, in order to offer and provide you a wider range of services and better services, to ensure that any updated contact information you provide is processed efficiently, and to engage in surveillance, compliance and reporting activities required by applicable law;
- **Other Third Parties.** To other third party suppliers or agents of ours who assist us in serving you with your consent, or as legally required or permitted to do so;
- **Law Enforcement/Legal Disclosures.** As required or authorized by applicable law, including to comply with a subpoena, warrant or court or arbitral order or litigation disclosure obligation. Primevest may disclose your personal information to law enforcement agencies or other independent organizations if Primevest reasonably believes the disclosure is necessary or appropriate in connection with national security, law enforcement or other issues of public importance, or if Primevest reasonably believes the disclosure is necessary or appropriate to protect and enforce Primevest's legal rights, interests and remedies or to protect the rights, interests, business, operations or clients of Primevest or other persons (including to detect and prevent fraud and other illegal activities, to enforce any of the terms of use, terms of service or other agreements that govern access to or use of any of Primevest's products and services);
- **Business Transactions.** In connection with a proposed or actual business transaction in which Primevest is involved (e.g. a corporate amalgamation, reorganization, merger or acquisition, or the sale or transfer of some or all of Primevest's business or assets), and in those circumstances Primevest will require the information recipient to agree to protect the privacy of your personal information in accordance with applicable law in connection with offers made to Primevest clients or prospective clients; and
- **Specific Consents.** In accordance with other express or implied consents that you give to Primevest during your interactions and transactions with Primevest.

Primevest has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the persons and organizations to whom Primevest discloses your personal information as set out above.

By making an investment in a Primevest investment product, establishing or maintaining an account with Primevest, using the Primevest website, or participating in offers made to Primevest clients or prospective clients, or other promotional activities or service offerings engaged in by Primevest, you have consented to the disclosure of your personal information to a third party in the circumstances or for the purposes described above.

You understand, acknowledge and agree that your consent to the disclosure of personal information in connection with a matter referred to above is not a condition of Primevest dealing with you in respect of

such matter, including the relevant offer or service to be provided, unless the disclosure of the information is necessary in respect of the particular matter.

7. YOUR RIGHT TO WITHDRAW CONSENT

Subject to legal or contractual restrictions, you may revoke or withdraw your consent to our collection, use, disclosure or retention of your personal information, or withdraw your consent to our further collection, use, disclosure or retention of your personal information at any time on reasonable notice, by contacting our Information Privacy Officer at the contact information set out in Section 17 of this Privacy Policy.

Withdrawing your consent for integral purposes: You may withdraw your consent for purposes that are integral to the provision of our products and services, subject to legal or contractual restrictions and on reasonable notice to Primevest, but then you might not be able to proceed with your intended interactions or transactions with Primevest or otherwise receive the full benefit of our products and services. Our client service personnel will be happy to explain any consequences of revoking or withdrawing your consent, and the options available to you.

Withdrawing your consent for additional purposes: Withdrawing your consent for additional purposes that are not integral to the provision of our products and services will not impact the provision of our products and services to you. You may withdraw your consent at any time to your personal information being used or shared for the following additional purposes:

- to communicate with you for the purposes of providing you with monthly performance data, quarterly commentary and advertising and marketing messages pertaining to additional products or services that may be of interest to you.

You may withdraw your consent by contacting our Information Privacy Officer at the contact information set out in Section 17 of this Privacy Policy.

8. LOCATION OF PERSONAL INFORMATION

In general, Primevest stores, accesses and uses personal information in Canada. Some of Primevest's service providers may process, store and use your personal information at facilities in various countries outside Canada, including the United States of America and one or more countries in Europe or Asia. The personal information protection laws of those other countries might be different from the laws of the jurisdiction in which you reside, and might permit courts, government, law enforcement agencies, regulatory agencies and security authorities to access your personal information without notice. By providing your personal information to Primevest, you consent to the transfer of the personal information to facilities located in other countries and the processing and storage of the personal information at those facilities.

9. RETENTION OF PERSONAL INFORMATION

Primevest will retain your personal information for the period reasonably necessary for the purposes set out or referenced in this Privacy Policy and to comply with Primevest's legal obligations or enforce or protect Primevest's legal rights, or a longer period required or permitted by applicable law.

Primevest will delete or dispose of your personal information, or anonymize the information, when Primevest is no longer required or permitted by applicable law to retain the information for the purposes set out or referenced in this Privacy Policy.

If you ask Primevest to delete your information, we will do so within a reasonable period of time. Please note that Primevest may need to retain some information about you in order to satisfy our legal and security

obligations. For example, some of your information may remain in back-up storage even if you ask Primevest to delete it.

10. ACCURACY AND ACCESS TO PERSONAL INFORMATION

Primevest makes every reasonable effort to ensure that your personal information is accurate and up-to-date. You will promptly notify us of any changes to your personal information using the procedure noted below.

You may reasonably request access to your personal information collected by Primevest and information about Primevest's use, disclosure and retention of that personal information by contacting our Information Privacy Officer at the contact information set out in Section 17 of this Privacy Policy.

In your communication, please include your account number(s), the information previously provided by you, and the new information that you would like to have updated. Subject to applicable exceptions and limitations prescribed by applicable law, you will be given reasonable access to your personal information, and you will be entitled to verify the accuracy and completeness of your personal information and to have the information revised as appropriate. You may be required to pay a reasonable fee for access to your personal information. Primevest may decline to process a request that is unreasonably repetitive, frivolous, vexatious or impracticable, that infringes or jeopardizes the privacy of other persons, or for other reasons permitted by applicable law.

11. PROTECTION OF PERSONAL INFORMATION

Primevest uses reasonable safeguards – including administrative, physical and technical security and safeguarding measures – appropriate to the sensitivity of the personal information in Primevest's possession or under Primevest's control to help protect the information from unauthorized access, collection, use, disclosure, deletion or similar risks. Nevertheless, security risks cannot be eliminated and Primevest cannot guarantee that your personal information will not be accessed, used, disclosed or deleted in ways not otherwise described in this Privacy Policy.

We implement a combination of measures to protect your personal information, for example:

- Primevest protects your personal information by storing it in locations that are designed to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of that information.
- Primevest protects your account information by using firewalls and other security technology to protect our network and systems from external breaches.
- Our employees (for example, client service personnel) have access to your personal information only on a need-to-know basis.

12. NON-PERSONAL INFORMATION

Primevest may use your personal information to create and collect non-personal information (information that is not about an identifiable individual), including personal information that has been aggregated or otherwise anonymized so that the information no longer relates to an identifiable individual. Primevest may use, disclose, transfer and retain non-personal information for any purpose and in any manner whatsoever. If non-personal information is combined with your personal information, then Primevest will treat the combined non-personal information as personal information for the purposes of this Privacy Policy for as long as the non-personal information is combined with your personal information.

13. OTHER WEBSITE AND BUSINESSES

Primevest's websites and correspondence (including emails and messages) may include advertisements for products and services offered by independent businesses or links to websites operated by independent

businesses. Primevest has no responsibility or liability for, or control over, those other websites, online services or businesses, their products or services, or their collection, use, disclosure or retention of your personal information. This Privacy Policy does not apply to the collection, use, disclosure or retention of your personal information by those websites, online services and independent businesses. If you have questions about how those websites, online services or independent businesses collect, use, disclose or retain personal information, please contact the owner or operator of the website, service or business.

14. CHILDREN AND PERSONAL INFORMATION

We do not knowingly collect personal information from children under 13 years of age without the consent of a legal guardian. To purchase our products and services, we must obtain the consent of your parent or legal guardian if you are under the age of majority and consent is a requirement in the jurisdiction of your residence. If we learn we have collected or received personal information from a child where parental confirmation was required, we will delete that information. If you believe we might have any information from or about a child where we should have obtained parental consent, please contact Primevest's Information Privacy Officer at the contact information set out in Section 17 of this Privacy Policy.

15. DISCLAIMERS, LIABILITY EXCLUSIONS/LIMITATIONS AND DISPUTES

The agreements (including any terms of service, account operating agreement, and other agreements) that you accept when you apply, register for, order or use the website or our products and services contain important provisions, including provisions disclaiming, limiting or excluding the liability of Primevest and other persons (including service providers) and provisions determining the applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, each of those provisions applies to any dispute that may arise in relation to this Privacy Policy or Primevest's collection, use, disclosure and retention of your personal information, and are of the same force and effect as if they were reproduced directly in this Privacy Policy. Nothing in this Privacy Policy amends any of those other agreements.

16. CHANGES TO THIS PRIVACY POLICY

Primevest may change this Privacy Policy as it applies to Primevest from time to time by posting a new version of this Privacy Policy on Primevest's websites. Primevest's collection, use, disclosure and retention of your personal information will be governed by the version of this Privacy Policy in effect at that time. Your continued dealings with Primevest after any change to this Privacy Policy will signify your consent to the collection, use, disclosure and retention of your personal information by Primevest as set out in the changed policy. Accordingly, you should check the "Last Updated" date of this Privacy Policy (at the top of this Privacy Policy) and review any changes since the last version.

You consent to Primevest sending you emails (to the email address you provide to Primevest) and providing other communications regarding this Privacy Policy and related matters.

17. INQUIRIES OR COMPLAINTS

Primevest's Information Privacy Officer is accountable for this Privacy Policy.

Inquiries or complaints regarding this Privacy Policy should be directed to our Information Privacy Officer at:

Primevest Capital Corp.
Suite 1730 – 400 Burrard Street
Vancouver, BC V6C 3A6

Phone: (604) 630-7011
Fax: (604) 683-7026