

Privacy Policy

Collection and Use of Personal Information

We collect, maintain and use the personal information of our managed account clients. We recognize how important privacy is for our clients and investors. Set forth below are our policies that apply with respect to the personal information we collect from clients.

What is Personal Information?

Personal information is any information that identifies you as an individual and includes your name, address, age, gender, marital status, social insurance number and other ID information, banking information and financial information. It may also include any communication you have had with us concerning your managed account. A leak of personal information can expose an individual to a risk of harm by bad actors.

Why do we Collect Personal Information?

We collect your personal information for the following reasons:

- to verify your identity and protect against fraud
- to fully understand your investment needs and objectives, where we act as portfolio manager
- to facilitate, maintain and administer your investments
- to provide you with, and manage any other services you have requested; and
- to comply with legal and regulatory requirements.

How do we Collect Personal Information?

Personal information is collected from the following sources, and is for the most part collected directly from you:

- forms that are submitted to us, including subscription documents, investment management agreements and/or account opening documents, as applicable
- transactions with us; and
- meetings, email correspondence and telephone conversations.

Use of Personal Information:

Unless you otherwise advise us in writing, by providing us with your personal information and/or entering into an investment management agreement with us you have consented to

us collecting, using and disclosing your personal information as provided herein and in the applicable agreement entered into with us.

We do not sell your personal information to third parties, however we will disclose your personal information to third parties in connection with the services we provide, including to:

- service providers who provide financial, custodian, accounting, legal, or tax preparation services
- service providers we hire to do our data processing or prepare any account statements; and/or
- taxation and regulatory authorities and agencies, where required or permitted by law.

Such disclosure to third parties will occur:

- where we have your consent pursuant to the investment management agreement you enter into with us
- where the third parties are agents or suppliers who assist us in serving you; and/or
- where we are required or permitted to do so by law, including to taxation authorities and securities regulatory authorities.

How We Handle and Protect Personal Information

We protect your personal information with commercially reasonable safeguards and security measures. We maintain security standards and procedures to help prevent unauthorized access to personal information. Our security standards and procedures are updated and tested from time-to-time to improve the protection of personal information and to assure the integrity of your personal information. All of our employees, agents and suppliers, as part of their agreements with us are bound to maintain confidentiality of personal information and may not use the information for any unauthorized purpose. When we provide personal information in response to a legal or regulatory inquiry or order, we ensure that the order is valid and we disclose only the information that is required - otherwise we will seek your consent prior to disclosing any information.

Client personal information is maintained on our networks or on the networks of our service providers. Personal information may also be stored on our secure cloud service provider. Information stored in foreign jurisdictions could be accessed by the courts, law enforcement and national security authorities in those jurisdictions. You may access your personal information to verify its accuracy, to withdraw your consent to any of the foregoing collections, uses and/or disclosures being made of your personal information and may update your information by contacting us. Please note that your ability to receive services from us may be impacted should you withdraw your consent to the collection, use and disclosure of your personal information as outlined above.

We only collect personal information that is necessary for us to provide you with the services you have requested, which extends to meeting our related legal obligations. We make every reasonable effort to keep client and investor information accurate and up-to-date. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information. If you find any errors in our information about you, let us know and we will make the corrections. For information that remains in dispute, we will note your opinion in the file.

We retain client and investor information for only as long as we require it for the reasons it was collected or as required by law. This period may extend beyond the end of your relationship with us but only for so long as it is necessary for us to have sufficient information to respond to any issue that may arise at a later date and to meet our legal recordkeeping obligations. When your personal information is no longer needed for the purposes explained to you, we have procedures to destroy, delete, erase or convert it to an anonymous form.

Upon request and unless prohibited by law, regulation or self-regulation, you will be given access to your personal information, be informed of its existence, use and disclosure.

Questions, Concerns and Complaints

If you have any questions, concerns or complaints about your privacy and the confidentiality of your personal information, or if you would like access to your personal information that we have on file, you may contact our privacy officer, Geoff Wilson at compliance@gbwealth.ca. You can also contact the Office of the Privacy Commissioner of Canada with privacy-related questions at (819) 994-5444. We may periodically update our privacy policy and when we do so we will post the updated version on our website and, where there are material changes made to it, circulate it to our then current clients.