



INTERNATIONAL FINANCIAL
DATA SERVICES

Privacy Policy

International Financial Data Services (Canada) Ltd. ("IFDS") handles personal information that it receives from clients and/or their intermediaries in connection with the services that IFDS provides.

IFDS is committed to personal privacy and to the protection of personal information. For this reason, we have prepared this Privacy Policy.

IFDS provides market-leading transfer agency technology and services to the Canadian and global marketplace. This Privacy Policy summarizes, for the benefit of our employees, clients, our clients' distributors, as well as for individuals, the principles we, at IFDS, apply to the handling of personal information in our Canadian operations. All IFDS employees must adhere to these principles and to our personal information handling guidelines.

"Personal information" means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization (i.e. the type of information that would be found on a business card or through publicly available information such as the phone book). If the information cannot be directly associated with an individual, it does not fall within the statutory definition of "personal information".

This Privacy Policy is reviewed periodically and may be modified from time to time, as required, if there is a change to applicable laws, regulations and standards. The most up-to-date version can be obtained at our website at www.ifdsgroup.com or by contacting us at the address set out below in the section called "*Contacting the Chief Privacy Officer*".

All IFDS employees are mandated to complete an annual Privacy training program. This is done through our PACE Partner tool and is closely monitored for completion.

1. Collection, Use and Disclosure of Personal Information

As a provider of transfer agency technology and services, IFDS does not directly collect, nor does it use, personal information from or about individuals for its own independent purposes. Rather, we receive personal information from our clients or their distributors for processing purposes. We operate under the direction of our clients and on the understanding that appropriate consents have been obtained, either expressly or implied, for the collection, use and disclosure of personal information. IFDS uses the personal information we receive solely to provide services to our clients in accordance with our contractual obligations and for no other purposes. Our staff is required, as a condition of employment, to limit access to and use of personal information to the extent necessary for the performance of their specific employment duties.

We may collect, use or disclose personal information without an individual's knowledge or consent in the following limited circumstances:

1. When the collection, use or disclosure of personal information is permitted or required by law;
2. In an emergency that threatens an individual's life, health or personal security;
3. When we require legal advice from a lawyer;

4. To protect ourselves from fraud;
5. To investigate the breach of an agreement or a contravention of law.

We do not use or disclose personal information for any marketing purposes.

2. Service Providers

IFDS may retain an affiliated company or an independent third party (“authorized service provider”) to perform, on our behalf, certain functions in support of the services we provide. Such functions could include, for example, application development, support, testing or transaction processing. Accordingly, in certain instances these affiliates or third parties may be provided with access to personal information to the extent that it is necessary in the performance of those functions.

IFDS obligates its authorized service providers to use and take steps to protect personal information in accordance with the requirements of this Privacy Policy.

Some authorized service providers may be located in the United States of America or another foreign country other than Canada, and in those cases personal information may be subject to the laws of the jurisdiction in which it is situated. Written information about our policies and practices with respect to authorized service providers outside Canada, and answers to questions about such service providers, may be obtained by contacting us at the address set out below in the section called “*Contacting the Chief Privacy Officer*”.

3. Security of Personal Information

As a processor of information on behalf of our clients, one of our most important privacy obligations is to take appropriate precautions to hold secure the information we receive. To that end, we apply security safeguards to our computing infrastructure and data in all forms. We maintain security policies, procedures and controls to protect the personal information we receive against loss or theft. We have safeguards in place to prevent unauthorized access, disclosure, copying, use and modification. We work with our clients to apply, to the extent that it is commercially and technologically feasible, the security standards required by our clients for the information we receive from them and which pertains to their business. Such safeguards and controls include, but are not limited to, the following:

1. Data security access control
2. Physical site access control
3. Network security
4. Virus protection
5. Intrusion detection
6. Remote use access control
7. Logical access control

We test and update, as appropriate, our safeguards and controls on a routine basis.

4. Retention and Access to Personal Information

IFDS retains personal information for the purposes described in this Privacy Policy and in accordance with our legal and contractual obligations to our clients. Personal information is stored at our offices in Canada or at the

offices of an authorized service provider as required and defined under “*Service Providers*” above. Personal information is securely stored or disposed of in accordance with the instructions we receive from our clients.

Individuals have the right to access their personal information held by an organization and to challenge an organization about its personal information practices. However, as a provider of transfer agency technology and related services, IFDS does not respond directly to requests from individuals to access personal information or to complaints from individuals about the personal information practices of our clients. Any such requests and inquiries are referred back to our clients. This procedure is necessary to ensure that the authenticity of the request and the identity of the requester can be established by an individual’s firm and/or the distributor, as applicable, and that IFDS can receive specific instructions before personal information is released by IFDS on the individual’s behalf.

5. Contacting the Chief Privacy Officer

IFDS has appointed a Chief Privacy Officer to be responsible for its personal information practices and standards. Organizations, clients or individuals with questions or concerns about our personal information practices, or individuals who require assistance in making a request to access their personal information through one of our clients, can contact our Chief Privacy Officer. The Chief Privacy Officer’s address is 30 Adelaide Street East, Suite 1, Toronto, Ontario, M5C 3G9, Canada.

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Policy Owner: **Dennis Gregoris, VP, Compliance & Chief Privacy Officer**