



## PRIVACY POLICY

Investeco Financial Corp. (“**Investeco**”), has adopted the following policy pursuant to the *Personal Information and Electronic Documents Act*.

(a) *Personal Information*

For the purposes of this policy, “**Personal information**” is information about an identifiable individual that is not publicly available, but does not include the name, title, business address or business phone number of an employee or an organization.

(b) *Collection of Personal Information*

Personal information is collected directly by Investeco from a client when the client opens an account with Investeco, or subscribes for units in any Fund managed by Investeco. Other types of information Investeco may collect and hold in a client’s account depends on the investment or services the client requests. At times, Investeco may request independent sources to verify and supplement information that the client provides to Investeco.

(c) *Investeco may use personal information for the following reasons:*

- (i) Identifying the client;
- (ii) Establishing and administering the client’s account;
- (iii) Ensuring the information in Investeco’s records is accurate ;
- (iv) Executing the client’s transactions;
- (v) Verifying previously given information when necessary;
- (vi) Providing the client and the client’s advisor/dealer with account statements and other account related information;
- (vii) Providing the client with financial statements, tax receipts, proxy mailings, transaction confirmations and other information which may be requested or needed to service your account;
- (viii) Communicating with the client and/or the client’s advisor/dealer regarding service offering or products which may be of interest to you; and
- (ix) Meeting legal and regulatory requirements.

Investeco will not sell any client’s information. Investeco may use a client’s information for general research in an effort to enhance Investeco’s service and product offerings. Investeco does not sell or share its list of e-mail addresses with any third parties for marketing purposes.

(d) *Disclosure to third parties*

Investeco may disclose a client’s information to Investeco’s agents, Investeco’s vendors, or other organizations only for the purposes set out in this Privacy Policy and for no other purpose. Third parties who may be provided with the client’s personal information include, but are not limited to:

- (i) The client's advisor/dealer ;
- (ii) Other mutual fund companies, financial institutions and securities dealers when necessary to carry out your instructions such as transferring funds;
- (iii) Investeco's affiliates;
- (iv) Governments, government agencies and regulators;
- (v) Third parties who perform services for Investeco, such as account statement preparation, mailing, courier deliveries, imaging and document storage; and
- (vi) Entities to whom Investeco believes it is legally obliged to provide information.

Investeco will ensure that third parties to which Personal Information is disclosed have appropriate Privacy Policies in place, where required.

(e) *Client consent*

In providing information to Investeco, directly or through an advisor, and continuing to conduct business with Investeco, the client consents to the use of his or her personal information. The client may withdraw consent to Investeco's use of his or her personal information at any time by contacting Investeco. If the client withdraws consent, such withdrawal may limit the services or products Investeco is able to offer to that client. In some circumstances, legal requirements may prevent the client from withdrawing consent.

(f) *Client Access to Information*

Investeco will provide the client with access to the client's personal information within 30 days of receipt of the client's written request, unless the requested information (i) contains references to other persons Personal Information, (ii) would cause Investeco to disclose proprietary information confidential to Investeco or its affiliates, (iii) has been destroyed, (iv) is too costly to retrieve, or (v) cannot be disclosed for legal or regulatory reasons. If Investeco is unable to provide the client with access to the client's personal information, Investeco will give the client an explanation. Investeco may charge the client for Investeco's costs incurred in providing the information requested.

(g) *Retention of Client Information*

Investeco only keeps a client's personal information for as long as it is required (whether to provide the client with services or as required by law or regulations). Once it is no longer needed, it is destroyed. Client information may be kept even if after the client is no longer with Investeco so long as it is legally necessary for Investeco to have sufficient information to respond to any issues that may arise at a later date.

(h) *Client Concerns*

If a client has any issues or concerns, he or she may take the following steps:

**Step 1.** Contacting Investeco at:

Telephone: 416-304-1750 ext. 378

Fax: 416-362-2387

E-mail: [info@investeco.com](mailto:info@investeco.com)

**Step 2.** If after contacting Investeco the client still has a concern, by contacting:

Privacy Commissioner of Canada

112 Kent Street

Place de Ville, Tower B, 3rd Floor

Ottawa, Ontario K1A 1H3

Telephone: 1-800-282-1376