MIRABAUD

PRIVACY POLICY

This privacy policy (hereinafter the '**Policy'**) describes how we handle personal information. This Policy is subject to, and forms an integral part of, our General Terms and Conditions and General Terms and Conditions of Deposit (hereinafter the '**General Terms and Conditions**').

In this Policy, the terms 'we', 'us' and 'our' refer to MIRABAUD CANADA INC., acting as the company holding personal information (hereinafter '**Company**). The Data Protection Officer (hereinafter the '**DPO**') ensures that internal practices are implemented and comply with data protection requirements. If you have any questions about this Policy or wish to exercise any of your rights in relation to your personal information, you may contact the DPO using the contact details provided in the 'How to contact us' section below.

'**Personal information**' includes any information relating to a natural person that enables that person to be identified, either directly or indirectly.

As a Company, we accept responsibility for the personal information we collect, use, disclose and retain in the course of our business activities. The purpose of this Policy is to inform you of the types of personal information we collect about you, the reasons why we use and share it, how long we retain it, your rights and how you can exercise them. Further information may be provided to you as and when required when you request a particular service.

Please note that we may also process personal information relating to a Related Person.

A **'Related Person'** means an individual or entity about whom you or a third party provide us with information and/or who is brought to our attention in any other way in the course of our business relationship or prior to the establishment of that relationship. A Related Person may include, in particular, (i) a director, officer, employee or authorised signatory of a company, (ii) a trustee, settlor, a beneficiary or a protector of a trust, (iii) any nominee or beneficial owner of an account, (iv) a holder of a substantial interest in an account, (v) the controlling holder, (vi) the beneficiary of a designated payment, or (vii) any representative or agent.

When you provide us with personal information relating to another person, you confirm that you are authorised to disclose it to us and, where required by law, that you have informed that person of such disclosure. We will process this information in accordance with this Policy and applicable data protection laws.

1. COLLECTION OF PERSONAL INFORMATION

We collect and use your personal information to the extent necessary for the purposes of our business and as described in our Terms and Conditions and this Policy, in particular to ensure a high standard of service for you. Depending on the nature of the service we provide, we may collect various types of personal information about you, including:

- **Identification details** (e.g. surname, first name, passport and identity card numbers, nationality, date and place of birth, gender, photograph);
- **Contact details** (e.g. postal address and email address, telephone number);
- **Family circumstances** (e.g. marital status, number of children);
- **Information relating to employment and education** (e.g. level of education, income);
- **Banking, financial and transactional information,** in particular regarding assets held with us and investments made through our services: account numbers, balances and performance figures for bank accounts and securities portfolios held with us, transaction history, the status of financial positions held, order execution notes, investment advice provided and related documentation (e.g. bank details, asset transfers, source of funds), your payment details, your credit history and your tax status (e.g. tax identification number);
- **Technical or digital information**, including details of your visits to our Website and apps and the pages you view, or information collected via cookies and other tracking technologies regarding your habits and preferences
- **Any other personal information that you voluntarily provide to us**.

We never ask you to provide sensitive personal information without your express consent, unless required by law.

2. METHODS OF COLLECTING PERSONAL INFORMATION

The information we hold about you may be provided to us directly by you or obtained from other sources, such as via:

- Your electronic, voice and visual communications with us (e.g. our meetings, calls, instant messages, emails, telephone conversations and documents exchanged);
- Appointment request forms;
- Our CCTV systems (e.g. video footage);
- Background checks and references;
- Publications/databases made available by official authorities;
- Databases made publicly available by third parties;
- An entity to which we provide services; and
- Any other third party, including recruitment agencies.

When you interact with our website, we will automatically collect information using cookies. You can choose to allow only those cookies that are necessary for the website to function, or manage your preferences at any time by accessing the **Privacy Preferences Centre**. For further information on the categories of cookies we use and the choices available to you, please see our **Cookie Policy**.

If you do not consent to the collection of your personal information, please do not use our website and do not provide us with any personal information.

3. SPECIFIC CASES OF PERSONAL INFORMATION COLLECTION

In certain circumstances, we may collect and use the personal information of individuals with whom we have, may have had, or have had a direct relationship, such as:

- People visiting our websites, including subscribers to our newsletters, fund documentation and investment recommendations;
- Existing clients or prospective clients; or

- Participants in our events.

In certain circumstances, we may collect personal information about you, without having a direct relationship with you, where such information is provided by one of our clients, a prospective client, a contracting party or an investor in collective investment schemes for which an affiliated company acts as a management company (the '**investment funds**') or a company with which we have a referral agreement, if, for example, you are:

- A family member;
- A representative (holding a power of attorney or acting in a professional capacity as an agent);
- A beneficiary of a payment transaction carried out by our clients;
- A beneficiary of a trust;
- A beneficial owner;
- A representative of a legal entity (who may be a customer); or
- A member of staff of a service provider or business partner.

4. PURPOSES OF PROCESSING PERSONAL DATA?

A. TO COMPLY WITH OUR LEGAL AND REGULATORY OBLIGATIONS

We process your personal information in order to meet our legal and regulatory obligations (including legal and regulatory directives, codes of conduct or position statements) and the requirements of other legal procedures (including any internal policies based on legal or regulatory directives, codes of conduct or position statements), which may include the laws of countries other than the one in which you are resident, including for:

- Comply with regulations relating to anti-money laundering, financial crime, terrorist financing and market abuse;
- Comply with regulations relating to sanctions and embargoes;
- Comply with regulations relating to financial markets (including self-regulatory standards), in particular those concerning investor protection and unclaimed and dormant assets;
- Comply with our prudential obligations (in particular regarding organisation and risk management);
- Implement security measures to prevent abuse and fraud;
- Detect unusual transactions;
- Record our interactions where necessary (such as telephone calls and video conferences, instant messaging (chat) conversations, and emails);
- Assess your credit risk profile and repayment capacity;
- Identify and manage risks (e.g. credit concentration risk, cyber risks);
- To respond to an official request from a judicial or administrative authority, including authorities located outside the territory of your country of residence;
- Combat tax fraud and comply with tax audit and reporting requirements in force; and
- To comply with applicable obligations regarding the reporting of transactions.

B. FOR THE PURPOSE OF PERFORMING A CONTRACT TO WHICH YOU ARE A PARTY OR TAKING PRE-CONTRACTUAL STEPS AT YOUR REQUEST

We use your personal data to enter into and perform our contracts, including to:

- Fulfil our obligations in relation to the services we provide (e.g. investment services and related services, such as management, advisory or payment services) or any other obligations arising from the execution of your instructions;
- Comply with the terms of the relevant contracts;
- Send administrative information, such as changes to our terms and conditions, clauses and guidelines;
- Manage, administer and distribute investment funds, including related services associated with these activities;

- To process applications for subscription, conversion and redemption in investment funds, and to manage the relationship regarding units held in these investment funds;
- To provide you with information about our services, including statements;
- To assist you and respond to your enquiries in connection with the services we provide to you, and to administer your account(s) and manage our relationship with you; and
- To determine whether we can offer you a service or product and on what terms.

C. TO PURSUIT OUR LEGITIMATE INTEREST

We use your personal data to deliver and develop our services and their security, to improve our risk management, and to protect our rights, privacy, security or property and/or yours or those of others, including for the purposes of:

- Verify transactions;
- Preventing and detecting fraud, and conducting investigations into fraud;
- Managing our IT infrastructure, client and third-party configurations, and ensuring the security of our IT systems;
- Ensuring the security of our premises and infrastructure;
- To train our staff (e.g. by recording telephone calls);
- Tailoring the services we offer you;
- Manage and administer our customer base;
- To analyse, evaluate and improve our operations;
- To analyse, evaluate and improve the performance, innovation and appeal (including financial appeal) of our services;
- To analyse and anticipate some of your interests, behaviours and personal preferences based on your use of our services, our website and our apps (profiling);
- To provide marketing services (e.g. newsletters, personalised communications, information that may be of interest to you, invitations to events, brochures or other promotional materials);
- To develop our business relationship with you and improve the quality of our services;
- To analyse data to gain a better understanding of how you interact with our websites, our apps and our adverts; and
- To establish, exercise and/or defend actual or potential legal claims, and to conduct investigations or similar proceedings.

D. TO RESPECT YOUR CHOICE IF WE SEEK YOUR CONSENT FOR A SPECIFIC PROCESSING ACTIVITY

If we need to carry out any other processing for purposes other than those set out above in section 4, we will inform you and seek your consent where necessary.

5. DISCLOSURE OF PERSONAL INFORMATION

A. PERSONS WITH ACCESS TO PERSONAL INFORMATION WITHIN THE COMPANY

Within the Company, access to personal information is restricted to staff members, directors, representatives and agents who need to access it in the course of their duties and for the purposes described in this Policy.

B. THIRD PARTIES WITH ACCESS TO PERSONAL INFORMATION

Personal information may be disclosed to third parties in connection with the services we provide to you. The recipients of this information vary depending on the services provided. In order to achieve the aforementioned purposes and subject to any duty of confidentiality that we may have expressly agreed with you or with counterparties, you authorise us to disclose your personal information to:

- **Technology and cloud service providers**, to ensure the hosting, storage, processing, protection and availability of our information and systems. This category includes third-party storage providers and central repositories, third-party IT service providers, third-party distribution platforms and messaging services, or providers of monitoring and alert management services (including event logging) relating to certain activities on our information, development and/or operational systems and the provision of a core business platform and other software, including in particular internal and external communication interfaces (including with the client);
- **Administrative and operational service providers**, to support the delivery of our services and the management of our activities. This category includes, in particular, providers of payment, banking, wealth management and communications infrastructure services;
- **Other parties to an agreement or transaction, counterparties, suppliers and beneficiaries**, where such disclosure is necessary for the performance of the services we provide or for the management of our business relationships;
- **Financial, tax, regulatory or judicial authorities, public bodies or national agencies**, upon request and to the extent permitted by law;
- **Certain professionals such as solicitors, notaries or auditors**, in order to obtain professional advice, carry out audits, handle claims or protect our rights and interests; and
- **Any other person, as agreed with you**.

We reserve the right to make personal information available to other recipients, in accordance with the information we regularly provide to you, where permitted by applicable laws or at the request of a competent authority.

The disclosure of personal information may be mandatory, e.g. to comply with the legal and regulatory obligations to which we are subject. Should you withdraw your consent and/or object to the transfer of your personal information, please note that this may prevent us from maintaining our business relationship with you and/or providing you with our services, and/or from carrying out certain transactions.

6. TRANSFER OF PERSONAL INFORMATION ABROAD

We may transfer your personal information outside our jurisdiction depending on the services requested and/or provided. In this context, the information may, in particular, be hosted, processed or accessed in the United States, India, the United Kingdom, France, Germany, Austria or other countries within the European Union.

In the case of a transfer abroad, this may take place if the personal data is afforded adequate protection in light of a privacy impact assessment, which includes an evaluation of the sensitivity of the personal data, the purpose for which it is used, the safeguards in place, and the legal framework of the country to which the data is transferred with regard to the protection of personal data.

Where personal data is transferred abroad, we will put in place appropriate contractual, technical and/or organisational measures to ensure the protection of your personal data (such as standard contractual clauses or binding corporate rules approved by the competent authorities, encryption of the data transmitted, the implementation of processes for managing and controlling access to data and IT systems, the definition and management of access privileges and/or the segregation of data), or we will obtain your consent (including through our Terms and Conditions and/or this Policy).

For details of the applicable safeguards, please contact us at the address set out in section 12 below.

7. SECURITY MEASURES

The protection of your personal information is important to us. We implement appropriate physical, technological and administrative security measures to prevent unauthorised access to, use of, disclosure of, alteration, loss or destruction of such information. Access to personal information is restricted to authorised staff members and service providers who need to access it in the course of their duties and for the purposes described in this Policy.

8. RETENTION OF PERSONAL INFORMATION

We will retain your personal information for as long as is necessary to fulfil the purposes for which your information is processed, for the period required by law, in accordance with contractual obligations and/or for as long as is necessary to safeguard our legitimate interests (such as to satisfy legal claims or respond to requests from regulatory authorities).

Personal data relating to our customers is generally retained for the duration of the business or contractual relationship, and thereafter for any additional period required under applicable laws, our retention obligations or our legitimate interests. Information collected about a prospective customer may be retained even if no contractual relationship is established, for the periods and on the grounds set out above. If you would like further information on how long your personal information is retained or on the criteria used to determine this period, please contact us at the address set out in section 12 below.

9. YOUR RIGHTS AND REMEDIES

Depending on the data protection laws applicable to you, you have the following rights, amongst others:

- **Right of access**: you may obtain information about the processing of your personal data and request a copy of this data in a machine-readable format.
- **Right to rectification or updating**: if you believe that your personal data is incomplete or inaccurate, you may request that it be amended.
- **Right to withdraw consent:** you have the right to withdraw, at any time, the consent you have given for the processing of your personal data. However, withdrawing your consent may prevent us from providing you with certain services or from continuing our professional relationship. In such a situation, we will inform you of the possible consequences of such withdrawal.
- **Right to data portability**: to the extent permitted by law, you have the right to request the return of the personal information you have provided to us in a structured and commonly used technological format or, where technically feasible, its transfer to a third party.

Withdrawing your consent does not affect the lawfulness of the use, disclosure or retention of your personal information prior to such withdrawal. In certain circumstances, we may continue to use, disclose or retain certain personal information where required or permitted by applicable laws, including to comply with a legal or regulatory obligation, to provide a product or service you have requested, to prevent or detect fraud, or to exercise or defend our rights and remedies. We will no longer use your personal information for direct marketing purposes if you withdraw your consent or object to such use.

If you require further information, or if you wish to exercise the rights set out above, please contact our Data Protection Officer, whose contact details are set out in section 12 below.

You may also direct any queries or lodge a complaint regarding this Privacy Policy or any personal information you have provided to us by contacting our Data Protection Officer, whose contact details are set out in section 12 below.

We will process all requests promptly, within 30 days of receipt. If no response is received within this period, the request is deemed to have been refused. In the event of a refusal of the request, in whole or in part, or if you consider our response to be unsatisfactory, you may challenge our decision by lodging an appeal with the Commission d'accès à l'information du Québec. You then have 30 days from the date of the refusal or from receipt of our response to lodge your appeal.

10. AUTOMATED DECISION-MAKING AND PROFILING

We do not use automated decision-making when processing your personal information. Should we need to use it in the future, we will do so in accordance with applicable laws and regulations.

We may, however, carry out profiling activities, which involve collecting and analysing certain information relating to your use of our services, applications or websites in order to assess certain characteristics about you, including your preferences, interests or usage patterns. This profiling is intended to help us better understand your needs and to present you with content, products or services that may be of interest to you. To this end, we use, amongst other things, cookies and similar technologies on our website. For further information on how they work and their purposes, please see our 'Cookie Policy'.

11. POLICY UPDATES

We may need to update this Policy from time to time. We will publish updates to this Policy on our website and, where appropriate, notify you of any significant changes via our usual channels of communication.

12. HOW TO CONTACT US

If you have any questions regarding our use of your personal information, please contact our Data Protection Officer using the following details:

Name of the Data Protection Officer: Sylvain Racine
Email: wm.ca.dataprivacy@mirabaud.com

Mirabaud Canada Inc.
For the attention of the Data Protection Officer
1 Place Ville Marie, Suite 2810
H3B 4R4 Montreal (Quebec) Canada
Policy effective from
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