



**FINANCIAL SERVICES**  
INVEST WITH INTEGRITY

## Customer Privacy Code

Respect for your privacy and the confidentiality of your personal and financial information has been a fundamental value of GIC Financial Services in the past, and will remain so in the future. We often review and adopt new technologies, like the internet, to serve you better. As we do so, respect for privacy will remain among our foremost concerns. We will adapt our systems so that your personal information is kept confidential and secure. As new laws come into force, like the Privacy Act, we will make every reasonable effort to ensure that we are fully compliant.

### **GIC Financial Services Commitment to Privacy**

The objective for GIC Financial Services is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada) and other applicable privacy legislation.

### **Compliance With Legal and Industry Standards**

We will make every reasonable effort to comply with industry standards and applicable federal and provincial laws in Canada, including the *Personal Information Protection and Electronic Documents Act*.

### **Purposes for the Collection, Use, Retention and Disclosure of Information About You**

The following are our purposes for collecting, using, retaining and disclosing your personal information:

- To establish and serve you as our client;
- To provide you with information about products and services that we believe would interest you;
- To detect and prevent fraud;
- To meet legal and regulatory requirements, and to comply with government and our regulators' requirements.

### **Limiting Disclosure to Third Parties**

We may provide your information to other persons only:

- when we have your consent, whether expressed or implied; or



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- to the suppliers or agents who assist us in providing the services you request, including our 'carrying' broker, whom we can reasonably trust to respect your privacy; or
- when we are required by our regulators to do so. (This includes collection, use and disclosure to and by our regulators. Our regulators include, without limitation, the Mutual Funds Dealers Association of Canada, the federal ombudsman and the Ontario Securities Commission).
- when we are required or permitted by law or regulation to do so; or
- when we need to disclose the information to protect our interests in the context of an existing or potential legal or administrative proceeding.

### **Safely Storing Information About You**

We will protect your information with appropriate safeguards and security measures. We will retain your information only for the time that it is reasonably required.

### **Providing You with the Right to Access and Update Information About Yourself**

We will give you access to the information we retain about you. We will make every reasonable effort to keep your information accurate and up-to-date.

### **Responding to Your Privacy Concerns**

We must decline to accept or to administer an account in respect of which you refuse or withdraw your consent to the collection, use or disclosure of your information to us that is required by our regulators. We will investigate and respond to your concerns about any aspect of our handling of your information or direct you to the organization on whose behalf we are collecting and handling your information, where appropriate.

### **Why We Ask For Your Information**

*We ask for information from customers in order to establish and serve them as clients.*

At GIC Financial Services, we gather and use personal information to provide you with the financial services you have requested, or to offer additional products and services we believe you might be interested in. We obtain most of our information about you directly from you.

The types of information we ask for depends on the nature of your request. Information that is essential for fulfilling most financial requests and applications typically includes your name, mailing address, e-mail address, phone number(s), account number(s) and Social Insurance Number.

In order for us to provide you with our services, it is a regulatory requirement imposed by our regulators for us to obtain personal information about you. In addition, we are required to ask for information to be compliant with our industry's "Know Your Client" rule, which includes obtaining information from you regarding your account objectives, risk tolerance level, investment knowledge, past experience, income and net worth.

Our regulators may require access to your information, whether you are a current or former client or an agent. We collect and disclose your information to our regulators and



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our regulators collect, use and disclose your information for regulatory purposes, including:

- surveillance of trading-related activity;
- sales, financial compliance, trade desk review and other regulatory audits;
- investigation of potential regulatory and statutory violations;
- regulatory databases;
- enforcement or disciplinary proceedings;
- reporting to other securities regulators; and
- information-sharing with securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

*We only collect the information needed and only use it for the purposes explained to you.*

When we contact you, we will indicate how we intend to use the information we collect from you if our purposes differ from that outlined in this Customer Privacy Code. If we wish in the future to use the information collected for purposes not previously identified, we will ask you for your consent at that time. We will only ask for the information necessary for the purposes we identified. We will indicate which information is optional for you to provide.

### **How We Protect Your Information**

*We will protect your information with appropriate safeguards and security measures.*

We have reasonable security standards to protect our systems and your information against unauthorized access and use. All safety and security measures employed by GIC Financial Services are appropriate to the sensitivity level of your information.

Electronic client files are kept in a highly secured environment with restricted access. Access is also highly restricted. In terms of online security, we appropriately manage our server environment and firewall infrastructure. We routinely employ current technologies to ensure that the confidentiality and privacy of your information is protected.

When we disclose information to a third party for a purpose that is permitted under this policy, we shall disclose no more than is necessary to accomplish the purpose, and whenever possible, obtain reasonable assurances that the third party will respect your privacy in accordance with applicable laws.

*We retain your information only as long as it is reasonably required.*

When your information is no longer needed by GIC Financial Services, we have secure procedures to destroy these documents.

The retention period may extend beyond the end of your relationship with us but only for so long as required by law or regulation or as is reasonably required by us.

### **Your Right To Access Your Information**



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*We will give you access to the information we have about you.*

It is important that your personal and financial information is accurate and complete. Please contact your Investment Advisor or their assistant if you wish to have access to any information we may have about you.

### **Keeping Your Information Accurate**

*We will make reasonable efforts, as appropriate or as required by the company on whose behalf we have contacted you, to keep your information accurate and up-to-date.*

If you find any errors in our information about you, let us know and we will make the appropriate corrections and make sure they are conveyed to anyone we may have misinformed. In order to make a change to the personal information GIC Financial Services holds about you, please send us the correction in writing by mail, fax or e-mail.

### **Recording Your Options**

*In certain circumstances, we must decline to accept or to administer your request or account where you refuse or withdraw consent to the collection, use or disclosure of your information by us.*

Any refusal or withdrawal of your consent to the collection, use and disclosure of your information is subject to legal, regulatory and/or contractual restrictions and reasonable notice. If you wish to withdraw your consent, please contact our offices. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent.