

## **PRIVACY POLICY**

Focus Asset Management Ltd. is committed to providing clients with the highest possible level of service. We understand how important it is to you, as our client, that we protect your privacy and the confidentiality of the personal information that you have entrusted to us.

As part of our commitment to you, we have established policies regarding the collection, use, disclosure and protection of your personal information. The points below outline what information we have, why we need it and how it is used, shared and protected. We also outline what rights you have with respect to your own privacy.

### **What Personal Information Does Focus Asset Management Have and Why do We Need It?**

Personal information refers to information that identifies you. It is primarily collected when you first establish your relationship with Focus Asset Management through our account opening process, however, there may be future requests for updated information as circumstances change.

For a personal account this information would include your name, address, contact information, date of birth, occupation, marital status, social insurance number, current financial position, investment experience, risk tolerance and intended use of your account. We are also required to directly examine certain government issued identification to assist in addressing anti-money laundering requirements.

For corporate, trust, estate and other non-personal accounts we will need to obtain personal information about all persons authorized to provide directions and for all beneficial owners. We will also request to review original or notarized copies of documentation that confirm the existence of the entity.

We need your personal information in order to establish your identity, meet regulatory requirements and protect you and us from error and fraud. Most importantly, this information assists us in being able to provide you with the best possible service.

### **How Do We Obtain Your Personal Information?**

Personal information is received directly from you or from your representative with your consent.

You always have the option of not providing the personal information that is requested, however, Focus Asset Management may not be able to open or maintain your account or provide services to you.

### **How Is Your Personal Information Used?**

Your personal information is used to identify you, establish and administer your accounts, execute transactions and to provide you, or your authorized representative, with account

statements, tax receipts and any other information that may be requested or needed to service your account.

Your information is also used in our internal business operations and is necessary in fulfilling our legal and regulatory requirements.

### **With Whom is Your Personal Information Shared?**

Client confidentiality and privacy is one of Focus Asset Management's fundamental principals. We will never sell or distribute your personal information to others.

However, there are circumstances where we may share your information with others outside of Focus Asset Management including:

- Third party service providers that Focus Asset Management hires to perform services on your behalf. We provide them with a limited amount of information in order that they may provide services including record keeping, document storage and statement preparation and distribution. They are prohibited from using the information provided for any other purposes other than to carry out the specific service they have been engaged to provide and they are not permitted to disclose this information to others.
- Your financial advisors, only where we have your written consent to do so.
- Government Agencies that regulate Focus Asset Management and its business, including (but not limited to) various Provincial Securities Commissions and Canada Customs and Revenue Agency.
- As permitted or required by law, Focus Asset Management is compelled to disclose personal information in response to a law, regulation, court order, subpoena, valid demand, search warrant or other legally valid request or enquiry. We may also disclose information to our accountants, auditors, agents and lawyers in connection with the enforcement or protection of our legal rights.

### **Where is your Personal Information Kept And For How Long?**

Your personal information may be kept in electronic or paper format at the offices of Focus Asset Management or its third-party service providers. Your information may also be kept in secure off-site storage facilities.

Record retention laws and industry rules provide that we must keep and update all personal information for as long as an account is open and a service is provided to a client. We are also required to retain information for as long as legally necessary after a relationship ends in order to respond to any issue that may arise at a later date.

### **How Is Your Information Protected?**

Client confidentiality and privacy is fundamental to the way we do business at Focus Asset Management. Our internal code of ethics requires all employees to maintain client confidentiality and each year our employees are required to certify in writing that they will comply with these high standards.

Policies, procedures, guidelines and safeguards have been put in place to ensure your personal information is protected. Our employees and service providers have access to your information to enable them to perform their duties in servicing you. Focus Asset Management maintains the highest standards of information security in order to prevent unauthorized access to your personal information. Most of your personal information is in the form of account documentation and transaction records which are both protected by physical locks, computer passwords and by limiting access to only those that need it to service your needs quickly, completely and accurately.

### **What Privacy Rights Do You Have?**

Upon request, we will provide you with access to your personal information. In addition, we may provide you with a list of third parties to whom your information was provided.

Focus Asset Management encourages you to review any information received from us or our service providers on a regular basis and to contact us to correct inaccurate, incomplete or outdated information.

You may withdraw your consent for the use of your personal information by notifying Focus Asset Management in writing of your intention to do so. Legal and other requirements may prevent you from withdrawing consent. Also, your decision to withdraw consent may mean that Focus Asset Management is no longer able to open or maintain your account or provide any services.

If you have any questions or concerns regarding this Privacy Policy you may contact our Privacy Officer in writing at:

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