

Privacy Policy

Our Commitment to Privacy

At Raymond James Investment Counsel Ltd. ("Raymond James"), we recognize how important personal privacy is to you. This Privacy Policy confirms our commitment that we will collect, use and share your personal information responsibly and safely and only for the purposes and in the manner set out in this Policy. Raymond James is committed to protecting your personal information and maintaining high standards of confidentiality through the implementation of appropriate administrative, technical and operational safeguards and security measures. We strive to be open and transparent with you as to our personal information practices.

The purpose of this Policy is to help you understand what personal information we collect, how we use, share and protect it, and how long we retain it. We will also explain how you can find out what personal information we hold about you and how you can manage your information in a way that best suits you, including your rights of access, correction and deletion.

We encourage you to read this Privacy Policy so that you have a good understanding of our personal information practices. By providing your personal information to us, you are consenting to the collection, use and sharing of your information as set out in this Privacy Policy and as otherwise permitted or required by law.

We may update this Privacy Policy from time to time without prior notice and we will post the revised Policy on our website. Policy changes will apply to the information collected from the date of posting to the website, as well as to existing information in our records.

Accountability

To ensure we meet our commitment to you, Raymond James has a Chief Privacy Officer who is responsible for overseeing our privacy practices and our efforts to comply with applicable privacy law and manage and mitigate privacy risk. Accountability for privacy protection extends across all of Raymond James as each of our employees is responsible for respecting and protecting the personal information to which the employee has access.

We have a comprehensive Privacy Framework for the secure and respectful treatment of personal information under the custody and control of Raymond James. Our Privacy Framework includes policies and procedures setting out our privacy obligations and how we deal with your personal information in compliance with applicable laws, as well as programs for monitoring privacy regulatory changes, communication, awareness and training, monitoring and testing, and reporting to senior management, the Board and regulators.

You can contact our Privacy Office using the contact information at the end of this Privacy Policy.

What Personal Information Do We Collect?

Raymond James collects your personal information in order to provide products and services to you.

"Personal information" is any information, alone or in combination, that directly or indirectly identifies you as an individual. Most of the information we collect is provided by you in the course of our relationship with you. We may also collect personal information about you from other sources depending on the products or services you request and our legal and regulatory obligations.

The personal information we ask for and use varies by the product or services that you request and in most cases is required by law or regulatory bodies. For example, your social insurance number (SIN) is required for products that earn investment income, in order to comply with the Canada Revenue Agency's income reporting requirements.

The personal information we collect can be sorted into four broad categories:

- **Identification and Contact Information**
 - The personal information in this category is used to communicate with you regarding your products and services and to identify and authenticate you as part of providing you with the products and services you have requested
 - Examples include your name, address, email address, telephone numbers, date of birth, gender, marital status, and identification numbers (e.g. driver's license number or passport number)
- **Financial Information**
 - The personal information in this category is used to assess your suitability or eligibility for certain products and services, including the appropriateness of various investment types or your creditworthiness for a credit product
 - Examples include your investment knowledge and objectives, risk tolerance, income, financial assets, property ownership, employment, and salary
- **Information to Manage our Risks and Interests**
 - The personal information in this category is used to carry out the due diligence we are required to carry out by law, including for financial crime management, to comply with regulatory obligations (such as tax reporting), and to protect both of our interests by preventing fraud
 - Examples include citizenship, place of birth, SIN, tax residency and tax identification number, and details of your transactions and the parties with whom you transact
- **Information about our Interactions with You**
 - The personal information in this category is used to retain records of your transactions and our interactions with you, to measure how our products and services are performing, to track how you use our websites in order to improve them, and for quality assurance and staff training purposes
 - Examples include transaction and activity records, records of calls and in-person meetings, and website use information

We don't ask for your personal information unless we need it to provide or improve our products and services for you.

How Do We Collect Personal Information About You?

We collect most of our information directly from you, primarily through our product and service opening forms which you complete with your Portfolio Manager.

Depending on the product or service you have requested, we may also collect personal information about you from third parties such as lenders or credit reporting agencies to give us information on your credit history. We may also contact employers or other personal references to verify information provided by you.

The personal information that we collect is gathered in a number of ways throughout your relationship and dealings with us as a client. We offer various methods of communication with us, including by mail, email, phone, and through our website.

We may monitor and/or record your telephone discussions with our representatives for our mutual protection, to enhance customer service and confirm our discussions with you.

We may also collect information about you, and track your behaviour, when you are visiting our website through the internet or your mobile device. For more information, refer to our Internet Privacy Policy at the following link: [Internet Privacy Policy](#)

Personal information collected through each of these methods will be protected through the administrative, technical and operational safeguards and security we have implemented as described in this Policy. Please see How Do We Protect Your Personal Information below for further information.

How Do We Obtain Your Consent to Use Your Personal Information?

At the beginning of your relationship with Raymond James when you first provide your personal information to us, and each time you request a new product or service, you will be asked to agree to a Privacy Consent. The Privacy Consent provides your consent to Raymond James to collect, use and share (collectively “process”) your Personal Information for all of the purposes described in this Privacy Policy, and for any other purpose the law may permit or require. The scope of the Privacy Consent that we are requesting covers only what Raymond James requires in order for us to be able to provide you with the products and services you have requested. Without your agreement to this standard Privacy Consent, we are unable to provide you with the products and services you have requested.

Should we need to use or share your personal information for a different purpose than is covered in the standard Privacy Consent you have provided, we will request an additional privacy consent from you prior to taking any actions.

Throughout your relationship with us, depending on the situation and the sensitivity of the information or the method of our interaction, we may obtain your privacy consent in different ways.

We may obtain express consent verbally, online or in writing. We may request your implied consent through your use of a product, or consider you to have provided implied consent when you approach us to obtain information, inquire about or apply for products or services from us. Whatever the method, our goal is to ensure that you understand the purpose of the consent that you are providing.

Your Optional Consent to Marketing

In addition to the standard Privacy Consent, you will be presented with an option of providing a separate consent to receive marketing from your Portfolio Manager and the professionals you work with at Raymond James at the beginning of your relationship with us and each time you request a new product or service.

A key component of the services offered by Raymond James is the market research and product and service information you will receive as a client of Raymond James that will help meet your total wealth management needs. You have the choice of opting in to agree to your advisory team and the professionals that you work with at Raymond James using your personal information to let you know about our products, services, and other opportunities by checking the consent tick box.

This consent is optional and may be changed or withdrawn by you at any time. You can update your marketing communication preferences at any time by contacting your Portfolio Manager or the branch or office you deal with. Please see Managing Your Consent Options below for further information.

How Do We Use Your Personal Information?

As set out in our standard Privacy Consent, Raymond James collects, uses, and shares your personal information for all of the purposes described in this Privacy Policy, and for any other purpose the law may permit or require. Our goal is to be transparent and this Policy sets out in more detail throughout its various sections how we collect, use, share and protect your personal information.

We included a summary of the key purposes for our processing of your personal information in our Privacy Consent and, for ease of reference, we summarize them again as follows:

(a) Providing and managing products and services you have requested

We collect, use and share your personal information within Raymond James, and with your Portfolio Manager to establish and maintain our relationship with you and provide you and your Portfolio Manager with the products and services you have requested. This includes typical portfolio management activities such as verifying your identity, recording account information, and reporting to you. If you request certain credit products (such as a margin account), it will also include sharing personal information with lenders or credit reporting agencies to obtain credit checks and determine your creditworthiness.

(b) Sharing with agents and third-party service providers for support services

Raymond James may share your personal information with our agents and third-party service providers for the purposes of providing support services to us. This includes activities such as

processing or delivering reporting documents, and providing customer service or other related support services for one or more of our products or services. Some of these service providers may be located or may have servers outside of the province of Quebec or outside of Canada. In such situations, those parties may be required to disclose information to courts, government authorities, regulators or law enforcement in accordance with the applicable law in those jurisdictions.

(c) Meeting our contractual, legal and regulatory obligations

We collect, use and share your personal information to meet our contractual, legal and regulatory obligations, and as may be permitted or required by law. This includes our obligations under federal anti-money laundering and suppression of terrorism legislation and protecting against fraud, crime and other risks. It may also include sharing your personal information with regulatory authorities or exchanges of which Raymond James is a member or to which we are otherwise subject, tax authorities, auditors and other professional service providers.

To fully understand all of the ways that we process your personal information, you must read this Policy in its entirety.

When Do We Share Your Personal Information?

Raymond James does not sell, trade or rent personal information of clients to third parties for their own use. We will not provide personal information to any third parties for their own marketing or other purposes unless we have your express permission to do so. We never sell client data for marketing purposes.

However, there are times when sharing of your personal information with third parties is necessary.

We may share information with:

- Our suppliers and partners with whom we work to serve you
- Other third parties to help complete a transaction initiated by you
- Regulators, government and law enforcement agencies
- Other business areas within our organization or
- If the disclosure is otherwise lawfully permitted or required.

a. Service Providers and Partners

To provide products and services to you, we may require the assistance of third party service providers and partners and need to share your personal information with them from time to time. This would include for example third party service providers that we hire to undertake activities such as:

- data processing or preparation (e.g. account statements)

- providing other services related to processing, authorizing and authenticating your transactions
- conducting analytics or
- providing customer service or other support or services for one or more of our products or services.

We may also disclose your personal information to other legal entities within the Raymond James group of companies, including our affiliates in the US, in cases where they are effectively operating as service providers to assist us in providing operational, administrative and support services and performing analytics on our behalf.

Only the information that is required for that purpose will be disclosed. We will seek agreement from those service providers and third parties to safeguard your personal information through appropriate administrative, technical and operational safeguards and security measures and standards.

b. Other third parties to help complete a transaction initiated by you

We may share your personal information with lenders or credit reporting agencies to conduct a credit check for account opening or margin purposes.

We may also be required to permit access to or share your personal information with another investment dealer or Portfolio Manager if your account is transferred to another investment dealer or Portfolio Manager for any reason.

c. Regulators, Government and Law Enforcement Agencies

We may share your personal information to comply with legal, compliance and regulatory obligations. This includes any subpoena, warrant, judicial or administrative orders, or valid demands or requests from governments, regulators, courts and law enforcement authorities in Canada or other jurisdictions or countries, as well as where we are of the view that it is necessary to do so in order to detect and prevent fraud, identity theft, money laundering and other illegal acts. For example, a request by a Government official for information, or a request from regulators to which we are subject to or from our auditors for the purposes of an audit or investigation relating to specific accounts or our business generally. In such cases, we will release only the information that is required and only after confirming that the appropriate legal authority to require such information is in place.

d. Other business areas within our organization

In addition to the services you have requested from Raymond James, you may wish to request other products or services from the other members of the Raymond James Canada group of companies (the RJ Canada Group). These companies offer a full suite of wealth management services, including Financial Planning, Insurance, Investment Services, Trusts and Estates, Tax Consulting and Preparation, US services, and Charitable Foundation services and activities.

Where you have requested such services, we may share the appropriate personal information to the relevant member of the RJ Canada Group.

Where Do We Store Your Personal Information?

Depending on the nature of the information, your information may be stored in the Raymond James offices where you regularly do business, in our computer systems or record storage facilities, or in the computer systems or record storage facilities of our affiliates or third party service providers.

Information may be stored and processed in any country where we have affiliates or service providers. Our service providers and other third parties, including our affiliates with whom we share information under this policy, may perform activities outside of Canada. As a result, your information may be used, stored or accessed in other countries and be subject to the laws of those countries. For example, information may be required to be shared in response to valid demands or requests from government authorities, courts, regulators and law enforcement officials in those countries as required by applicable law. By using our products or services, you consent to the transfer of information to countries outside of Canada and outside of Quebec, which may provide different data protection rules, including to the United States.

No matter where we store your personal information, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We have strict standards to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, and sharing. Please see [How Do We Protect Your Personal Information](#) below for further information.

How Long Do We Retain Your Personal Information?

We retain your personal information only as long as it is required for the reasons it was collected, as required by law or regulation, or to manage risk.

The length of time we retain information varies depending on the product or service and the nature of the information. This period may extend beyond the end of your relationship with us but only for so long as it is required by regulation or necessary for us to respond to issues that may arise at a later date.

When your personal information is no longer needed, we have procedures to securely destroy, delete, erase or convert it to an anonymous form.

How Do We Protect Your Personal Information?

There are several ways we strive to protect your personal information.

We maintain appropriate administrative, technical and operational safeguards and security measures and standards to help prevent unauthorized use, access, disclosure, loss or theft of your personal information in our custody or control. We update and regularly test our security standards and procedures to improve the protection of, and to assure the integrity of, your personal information.

We have procedures that limit employee access to personal information to those employees with a business need to know such information about you. We educate our employees about the importance of confidentiality and client privacy through standard operating procedures and training programs. We take appropriate measures to enforce employee privacy responsibilities.

Our technological systems are monitored 24 hours a day, 365 days a year, for signs of tampering or unauthorized activity. We employ the use of encryption, virtual private networks, penetration/vulnerability testing, and the latest firewall and antivirus technology. Our email and electronic communications are also monitored for regulatory and compliance purposes in order to protect our clients. We also maintain strict controls to limit and monitor employee access to our systems.

Our information technology professionals constantly research and develop enhancements to keep us at the vanguard of data security. A team of independent auditors reviews our technological systems on a regular periodic basis.

Our service providers and agents, as part of their contracts with Raymond James, are bound to maintain your confidentiality and may not use client personal information for any unauthorized purpose.

What Are Your Rights to Manage Your Personal Information Held By Raymond James?

You have several rights regarding the management of your personal information held by us. It includes your rights to access, correct or delete your information and manage your consents.

1. Keeping Your Personal Information Accurate

We attempt to keep our records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying your Portfolio Manager or the Privacy Office of any changes to your personal information. If you find any errors in our information about you, let us know and we will make the corrections promptly and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

2. Managing Your Consent Options

We only collect the personal information that is necessary to provide or improve the products or services requested by you and to comply with applicable laws.

It is always your choice whether or not to provide your personal information or to consent to our obtaining personal information about you from third parties. You may refuse to provide or withdraw your consent at any time. However, if you choose not to provide requested personal information or consents, or withdraw your consent, we may not be able to open or continue to service your account or provide you with all of the products and services you are requesting. For example, we cannot open or maintain an investment account without certain personal information as we would be in breach of our legal and regulatory obligations.

You may continue to receive certain types of communications, including electronic messages or offers, from Raymond James even after you have withdrawn your consent or unsubscribed to emails. These may include messages sent from our online portal, messages sent in response to

specific inquiries, messages to satisfy a legal obligation, or to enforce or provide you with notice of an existing or pending right.

To clarify any questions you may have about your consent options, please feel free to contact your Portfolio Manager or the Raymond James Privacy Office using the contact information set out below. We will be pleased to explain your options and any consequences of refusing or withdrawing your consent.

3. Obtaining Access to Your Personal Information

Most of your information is available to you through the reporting you receive on your products and services. If you want to request access to additional personal information we may hold about you, and information about Raymond James' use and disclosure of that information, you may contact the Raymond James Chief Privacy Officer as provided at the end of this Policy.

We will require you to put your request in writing and provide us with enough specific details to help us understand your request and conduct our search for your information. We will need you to verify your identity before searching for, or providing you with, access to your information. We will let you know in advance whether there will be a fee to provide access to your information. We may also ask you for additional information to confirm the scope of your request, such as the relevant time period or a specific description of the information you are seeking to access.

Once we receive your written request, verify your identity and understand the scope of your request, we will provide a written response to your access request within the time frame set by applicable privacy law.

If you have a sensory disability, you may request your information in an alternative format. If we already have this format, we will provide it. Otherwise, we will convert the information into the requested format if it is reasonable and in accordance with applicable privacy law to enable access.

Please note that we may not be able to provide information about you from our records if it contains references to other persons that cannot be separated, is subject to legal privilege, contains information proprietary to Raymond James, relates to an investigation of a breach of an agreement or law, or cannot be disclosed for other legal reasons. Also, we do not maintain disclosure records for regular or routine actions.

On request and where legally permitted, we will provide you with the types of third parties to whom we have, or may have, given your information. However, this will not include service providers we have used to do work for us. It will also not include reports to the Canada Revenue Agency or information that has been provided for legal and regulatory obligations.

4. Requesting Deletion of Your Personal Information

As indicated above, we retain your personal information only as long as it is required for the reasons it was collected or as required by law or regulation. When your personal information is no longer needed for the purposes explained to you, we have procedures to securely destroy, delete, erase or convert it to an anonymous form. If you want to request deletion of any personal information we may hold about you, you may contact the Raymond James Chief Privacy Officer as provided at the end of this Policy. We will require you to put your request in writing and provide us with enough specific details to help us understand your request.

Privacy on the Internet

Raymond James is committed to respecting and protecting the privacy of visitors who visit our website. We use cookies and other tracking technologies to collect information of visitors to our website. A cookie is a common technology that permits our website to recognize future visits by your computer as well as how and when you use a site, and your user preferences, to monitor how the website is being used. We use this information to determine which settings are appropriate for your computer or device, to provide or enhance digital functionality, and for security purposes including fraud prevention, internal analysis and reporting.

Our website may contain links to other websites. Always remember that when you click on one of those links, you are contacting another website for which Raymond James has no responsibility or control.

Our Internet Privacy Policy explains how we collect, use, share and protect your personal information when visiting our website and your options to limit the collection of information. . For more information, refer to our Internet Privacy Policy at the following link: [Internet Privacy Policy](#)

Resolving Privacy Issues

If you have any questions about privacy and confidentiality or any concerns or complaints about the way a request for personal information was handled, please contact the Raymond James Privacy Office directly at the contacts listed below:

5300-40 King Street West, Scotia Plaza
P.O. Box 415
Toronto, ON Canada
M5H 3Y2
Tel: (416) 777-6438 or 1-888-410-1179
Email: privacyofficer@raymondjames.ca

If we are unable to resolve your concerns to your satisfaction, you may contact the Office of the Privacy Commissioner of Canada:

30 Victoria Street
Gatineau, Quebec
K1A 1H3
Toll-free: [1-800-282-1376](tel:1-800-282-1376)

Phone: (819) 994-5444

TTY: (819) 994-6591

www.priv.gc.ca