

PRIVACY POLICY

Protecting privacy and maintaining the confidentiality of personal information has always been integral to the way we do business at FundEX Investments Inc. ("FUNDEX"). We continue to protect privacy and an individual's right to control the collection, use and disclosure of their personal information. We have procedures in place that guide FUNDEX employees and representatives in maintaining confidentiality. FUNDEX adopted the Investment Funds Institute of Canada ("IFIC") Privacy Code, established related policies and procedures and appointed a Privacy Officer. Our employees understand the importance of the policies and procedures and follow them carefully. Privacy protection is essential to providing excellent service.

FundEX Privacy Principles

Our Privacy Principles comply with the provisions of Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"). These principles are as follows:

- Principle 1:** Accountability.
FUNDEX is responsible for maintaining and protecting the personal information we collect.
- Principle 2:** Identifying Purposes.
The purpose for which personal information is being collected will be explained either before or at the time it is collected.
- Principle 3:** Consent.
FUNDEX will obtain consent to collect, hold, use and disclose personal information. This is done by providing a Privacy Protection Notice when an account is first opened or alternatively if an account currently exists by providing notice in a separate communication.
- Principle 4:** Limiting Collection.
FUNDEX will limit the information collected to what is needed for those purposes FUNDEX has identified. We list these identified purposes in the section entitled "How Do We Use Personal Information".
- Principle 5:** Limiting Use, Disclosure and Retention.
FUNDEX will use and disclose information only for the purposes identified, or when it is required or permitted by law. We retain information only for as long as is necessary for the fulfillment of these purposes.
- Principle 6:** Accuracy.
FUNDEX keeps personal information as accurate, complete and up-to-date as is necessary for these purposes.
- Principle 7:** Safeguards.
FUNDEX protects personal information from unauthorized access, disclosure and use with appropriate safeguards and security measures.
- Principle 8:** Openness.
Upon request, FUNDEX will provide specific details about FUNDEX information handling policies and procedures.
- Principle 9:** Access.
FUNDEX will provide access to the personal information collected. An individual may check the accuracy of their personal information and request that it be amended as appropriate.
- Principle 10:** Challenging Our Compliance.
FUNDEX will investigate and respond to concerns about any aspect of our handling of personal information.

How Do We Collect Personal Information?

The information collected is retained in the "client record". The client or their FUNDEX representative provides most of this information when a product or service application form is completed or an account is opened.

What Information Do We Collect?

The personal information in a client record may include a client's name, address and telephone number, social insurance number, birth date, driver's license, passport number, medical information, income, net worth, account holdings and the name, address and social insurance number of a client's spouse and/or beneficiary. Depending on the investment or service requested, additional personal information may be held in a client record. For example, if a pre-authorized payment plan is established, a financial institution account number is recorded. FUNDEX is required by law to collect social insurance numbers to facilitate required tax reporting to the Customs and Revenue Agency ("CRA").

How Do We Use Personal Information?

FUNDEX may use personal information for the following *identified purposes*:

- Identifying individuals and ensuring the accuracy of information in the client record;
- Establishing, administering and servicing all accounts;
- Determining, maintaining, recording and storing account holdings and transaction information in a client record;
- Executing transactions or processing applications, including transferring funds by electronic or other means;
- Providing clients and their FUNDEX representative with account statements and other account or policy information which may be requested in order to service an account;
- Protecting clients, FUNDEX representatives and FUNDEX against errors and fraud;
- Meeting the legal and regulatory requirements of various statutes including provincial securities legislation and federal money laundering regulations; and / or
- Verifying information previously given by a client with any other organization when necessary for the purposes provided in this policy.

Who Else Do We Collect Information From?

There are times when information is collected from a third party. This information is only used for the purposes identified within this policy. These parties include:

- A FUNDEX representative;
- Other financial institutions or mutual fund companies;
- Other companies within the FUNDEX Group of Companies; and / or
- Third parties who represent that they have a legal right to disclose the information, for example, the executor of an estate.

To Whom Do We Disclose Information?

There are times when we may disclose your information to FUNDEX representatives, suppliers or other organizations. This information is only used for the identified purposes. These representatives, suppliers and organizations include:

- Other financial institutions or mutual fund companies;
- Other companies within the FUNDEX Group of Companies;
- Canadian governments and government agencies;
- Canada Post; and
- Account statement preparation and mailing companies, courier companies, imaging companies and document storage companies.



For regulatory purposes, self-regulatory organizations such as the Mutual Fund Dealers Association of Canada ("MFDA"), may require access to personal information of current and former clients, employees, representatives, directors, officers, partners and others, that has been collected or used by regulated persons of their members. These self-regulatory organizations collect, use or disclose such personal information obtained from regulated persons 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 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.

Sharing information with these third parties is essential to providing excellent service. When FUNDEX transfers personal information to third parties, for example, mailing companies, we ensure by contractual means that the transferred personal information is used only for the purposes for which the third party is retained.

Disclosing Information When Required Or Permitted By Law.

FUNDEX must provide information in response to a valid demand, search warrant or other legally valid inquiry or order. We may disclose information to an investigative body in the case of a breach of an agreement or contravention of laws. We may also disclose information to help FUNDEX collect a debt owed by a client.

How Do We Obtain Consent?

A Investor Privacy Notice is provided at the time a FUNDEX product or service application form is completed or an account is otherwise established. The Investor Privacy Notice may also be sent in a separate communication. The Investor Privacy Notice explains how we collect, hold, use and disclose personal information. By completing and signing a new account application form and continuing to do business with FUNDEX and our representatives, an individual is consenting to the use of personal information. FUNDEX may possess personal information that we collected before implementation of our current Privacy Policy, for which we do not yet have your express or implied consent to use. We will continue to use that information for the purposes set out in this policy, unless requested in writing to stop using that information. This is considered implied consent. **Personal information will not be shared with sales representatives of any other company without your express consent.**

How To Withdraw All Or Partial Consent.

By contacting FUNDEX's Privacy Officer at 1-800-324-6048 or 905-305-1651 you may withdraw consent for FUNDEX to use your personal information. In some circumstances, legal requirements may prevent an individual from withholding consent. A decision to withhold personal information or consent may also prevent FUNDEX from opening an account or it may limit the products or services we are able to provide. The collection of personal information and its disclosure to certain third parties is necessary and in certain instances a legally required part of making the product or service available to clients.



Your Right To Access Information.

Except in limited circumstances, we can provide the information we have in a client record to the client in order to verify and amend it. We will provide requested information within 20 days of receipt of a written request, unless prohibited by law. Please note that we may not be able to provide personal information in the following circumstances:

- The information contains references to other persons and the references are subject to legal privilege;
- The information contains confidential information proprietary to FUNDEX;
- The information relates to an investigation of a breach of agreement or contravention of laws; or
- The information cannot be disclosed for other legal reasons.

Keeping Information Accurate.

Accuracy is essential to providing excellent service. FUNDEX is to be informed of any errors in a client record as soon as possible so that we may immediately correct the client record. If the accuracy of information is in dispute, we will note it in the client record.

Where Do We Keep Information?

The client record is kept in electronic or paper format at the offices of FUNDEX and FUNDEX representatives. Paper records forming part of a client record may also be kept in offsite storage. The client records may be transferred to other locations for disaster recovery purposes.

How Do We Protect Information Against Loss And Unauthorized Access?

FUNDEX employees, representatives and third party service providers have access to personal information provided the information is required for the identified purposes and access is permitted only to the extent necessary for such purposes. In addition, we have taken several measures to protect information, such as restricting physical access to our offices and using computer passwords and file encryption for on-line activities and electronic storage.

How Long Do We Keep Information?

We retain information only as long as it is required for the reasons it was initially collected and legal statutory requirements. 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 an individual's relationship with FUNDEX but only for so long as it is legally necessary for us to have sufficient information to respond to any issues that may arise later.

Resolving Concerns.

For any questions, concerns or complaints about the treatment of personal information please follow these steps:

Step 1. In most cases, a concern is resolved simply by discussing it with the appropriate FUNDEX representative.

Step 2 If concerns cannot be resolved with the FundEX representative, please contact FUNDEX's Privacy Officer by telephone at 1-800-324-6048 or 905-305-1651 or in writing to:

Privacy Officer
FundEX Investments Inc.
208 - 25 Centurian Drive
Markham, ON L3R 9R9

Step 3. If after contacting the FUNDEX Privacy Officer concerns remain unresolved, contact may be made to the following:

The Mutual Fund Dealers Association of Canada:

121 King Street, Suite 1000
Toronto ON M5H 3T9
Telephone 416-361-6332 or 1-888-466-6332

The Privacy Commissioner of Canada:

112 Kent Street
Ottawa, ON K1A 1H3
Telephone 613-995-8210 or 1-800-282-1376
Web-site www.privcom.gc.ca

Or in Quebec:

The Commission d'accès à l'information
575, rue St. Amable, bureau 1.10
Quebec City, QC G1R 2G4
Telephone 418-528-7741 or 1-888-528-7741

Who Can Answer Questions About Privacy?

For answers to questions about how FUNDEX handles personal information, please call the FUNDEX Privacy Officer at 1-800-324-6048 or 905-305-1651.

Your personal information may be disclosed to FUNDEX affiliates provided that such disclosure relates to one of the identified purposes in this policy.

FUNDEX appreciates your business and promises to handle any questions or input regarding personal information in a prompt and courteous manner.