

## SIGHTLINE WEALTH MANAGEMENT PRIVACY POLICY

Sightline Wealth has adopted a privacy policy in accordance with the Personal Information Protection and Electronic Documents Act (Canada) with respect to personal information of Sightline Wealth clients. This policy states that Sightline Wealth will only disclose this information to third parties or its affiliates in limited specific circumstances on a strictly confidential basis. This policy and procedures are put in place to safeguard the confidential information relating to our clients.

The privacy of our investors is very important to us. Sightline Wealth is committed to protecting its clients' privacy and maintaining confidentiality of their personal information. This Privacy Policy may be updated from time to time without notice. This Privacy Policy was last modified on August 31, 2020.

This Privacy Policy outlines our commitment to you and incorporates the following 10 key privacy principles:

### 1. ACCOUNTABILITY

We have strict policies and procedures governing how we deal with your Personal Information. Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access to.

Kirstin McTaggart, our Chief Privacy Officer, oversees privacy governance including policy, dispute resolution, education, communications activities and reporting to our Board of Directors on privacy matters. Please see Contact Us for information on how to reach our Chief Privacy Officer.

### 2. IDENTIFYING PURPOSE

The term "Personal Information" refers to any information that specifically identifies you, including information such as your home address, telephone numbers, social insurance number, birth date, assets and/or income information, employment history and credit history.

When we collect and use your personal or business information in order to give you the best possible service and for the purposes set out in your agreement(s) with us, such as:

- To establish your identity and verify the accuracy of your information;
- ensure we have accurate and up to date information about you;
- provide and manage products and services you have requested or accepted;
- understand your financial services requirements;
- better manage your relationship with us;
- determine your eligibility for certain of our products and services, or products or services of others;
- protect against fraud, and manage credit risk and other business risks;
- determine suitability of products and services for you;

- comply with legal or regulatory requirements, or as otherwise permitted by law;
- communicate with you regarding products and services that may be of interest;
- understand our customers and to develop and tailor our products and services, and
- respond to any questions you may have.

If a new purpose for using your Personal Information develops, we will identify that purpose.

### 3. CONSENT AND YOUR CHOICES

By signing a subscription form or an application form and/or continuing to do business with us, you are consenting to the collection, use and disclosure of your personal information for the purposes identified in this Privacy Policy. Ninepoint Financial Group will not, as a condition of the supply of services, require you to consent to the collection, use or disclosure of your personal information beyond that required to fulfill those purposes.

You can manage your marketing preferences by advising your advisor to sign up or to opt out of all of our direct marketing communications or by selecting to opt out on any of the marketing communication emails. In some cases, if you are a director, officer, trustee, guardian, attorney for property, authorized signatory, authorized representative or other decision-maker for, or an owner or beneficiary (directly or indirectly) of, one of our customers, we may obtain your consent to collect, use or disclose your Personal Information through our customer.

You may withdraw all or part of your consent for us to collect, use or disclose your personal information subject to legal restrictions and reasonable notice as well as if by withdrawing your consent may mean that we may not be able to provide you with the products or services you request. We will inform you of the implications of such withdrawal of consent for the continued provision of services to you.

### 4. LIMITED COLLECTION

We only collect the Personal Information that we determine we need for the purposes set out in Principle 2, Identifying Purpose.

For example, we may collect:

- **Contact Information** including address, telephone number and email address.
- **Social Insurance Number (SIN)** as required in order to comply with the Canada Revenue Agency's reporting requirements. You may provide your SIN to ensure an accurate match between your Personal Information and credit bureau information and to help us differentiate clients who may have the same or similar name.

- **Financial Information** to ensure that the advice and/or products we provide you are appropriate for you and the investments you purchase are suitable for you.
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk.
- **Website Use Information** such as browsing behavior on our website and links, location you click, form data and downloads as well as other data gathered from the use of web tools (for example, Cookies, Web Beacons, Tagging) to better understand your interests and needs so that we can serve you better. For more information, see our Online and Mobile Privacy Policy.
- **Employment Information**, including information about your previous and current employers, to confirm your eligibility for certain products and services.

We may collect Personal Information about you from you and from third parties or sources that are available to the public to satisfy legal requirements or regulatory expectations or to manage our risk and to help us understand our clients in order to recommend suitable investment products to assist you in achieving financial goals.

You can choose not to provide us with certain information in some situations, but if you make this choice, we may not be able to provide you with the product, service, or information you request.

## 5. LIMITED USE AND DISCLOSURE

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Policy. Personal Information may be released to third parties including legal or regulatory authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets (for example, collection of overdue accounts).

We may also be required by law to disclose information to government regulatory authorities (for example, we may be required to report your income to taxation authorities). We may also be required to disclose your personal information to self-regulatory organizations (“SROs”), which collect, use and disclose such personal information for regulatory purposes, including trading surveillance, audits, investigations, maintenance of regulatory databases and enforcement proceedings. SROs may, in turn, disclose such personal information when reporting to securities regulators or when sharing information with other SROs and law enforcement agencies.

We may share your Personal Information within Ninepoint Financial Group (Sightline’s parent company), for the purposes described in Principle 2 – Identifying Purpose. You can manage your direct marketing preferences to opt out of all of our direct marketing communications. See Principle 3 – Consent and Your Choices.

We do not sell the names or other Personal Information of our customers. We do not disclose the names or other Personal Information of our customers to other companies outside of Ninepoint Financial Group without consent unless required or permitted by law.

Ninepoint Financial Group may be involved in the sale, transfer or reorganization of some or all of its business at some time in the future. As part of that sale, transfer or reorganization, we may disclose your personal and business information to the acquiring organization.

We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed. In some cases, these other companies may be located outside of Canada (such as in the United States) and may be required to disclose information to courts, government authorities, regulators or law enforcement in accordance with applicable law in that country.

## 6. RETENTION

We have policies in place that govern the retention of your Personal Information so it will be kept only for as long as reasonably necessary to fulfill its intended purpose or to satisfy legal requirements.

## 7. ACCURACY

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your Personal Information changes, please notify your Investment Advisor immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in Contact Us.

## 8. SAFEGUARDS

We carefully safeguard your Personal Information and, to that end, restrict access to personal information about you to those employees and other persons who need to know the information to enable us to provide services to you. Our employees are responsible for ensuring the confidentiality of all personal information they may access. Annually, each of our employees is required to sign a code of conduct, which contains policies on the protection of personal information.

We use physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with our custodian (National Bank Independence Network, “NBIN”) and third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

## 9. OPENNESS

We may amend this Privacy Policy from time to time to take into consideration changes in legislation or other issues that may arise. We will post the revised Privacy Policy on our website: [sightlinewealthmanagement.com](http://sightlinewealthmanagement.com). We may also send it to you by mail upon request.

## 10. INDIVIDUAL ACCESS

You may request access to the personal information we hold about you at any time to review its content and accuracy and to have it amended as appropriate. To request access to such information please contact us in writing (See Contact Us for Contact information). We will respond to your written access request promptly. We may be unable to provide you with access to all or some of the information we hold about you. We will provide you with an explanation in the event that we are unable to fulfill your access request.

## CONTACT US

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please contact our Chief Privacy Officer by:

- Telephone at 1-888-362-7172 or
- E-mail at [compliance@sightlinewealthmgt.com](mailto:compliance@sightlinewealthmgt.com) or
- Mail to:
  - Sightline Wealth Management
  - Attention: Chief Privacy Officer
  - South Tower, Royal Bank Plaza
  - Suite 2700, 200 Bay Street
  - Toronto, Ontario M5J 2J1

If after contacting us, you do not feel that we have adequately addressed your concerns, you may contact The Office of the Privacy Commissioner of Canada:

- 30 Victoria Street
- Gatineau, Quebec
- K1A 1H3
- Toll-free: 1-800-282-1376
- [www.priv.gc.ca](http://www.priv.gc.ca)

## ONLINE AND MOBILE PRIVACY POLICY

For information about our online and mobile Personal Information practices, please see our Online and Mobile Privacy Policy.

### SCOPE OF SIGHTLINE WEALTH MANAGEMENT ONLINE AND MOBILE PRIVACY POLICY

This Online and Mobile Privacy Policy supplements Sightline's Privacy Policy and specifically addresses the way in which we will collect, use, disclose and manage Personal Information in connection with our website and other electronic services. It should be read in conjunction with the Legal Terms of Use.

### YOUR CONSENT

Each time you use our online and electronic services, you are indicating your acknowledgement and consent to the collection, use and disclosure of your Personal Information as set forth in this policy, which we may revise periodically without notice. We will let you know of any changes by posting the revised policy with a new effective date. If you do not accept the terms outlined in this policy, please do not use our online and electronic services.

### COLLECTION OF PERSONAL INFORMATION

We may collect personal information when you use our website, and other electronic services. For example, we may collect:

- **Account/Contact Information**, such as your name, email address, user ID, password and service preferences.
- **Financial Information**, such as that required in an online application for account opening.
- **Location Information**, such as the information about your device's approximate physical location for purposes such as validating your identity, the prevention, suppression or detection of crime. The ability to access location information is controlled by your device. Please refer to the documentation for your device regarding how to allow or block the collection of location information. If you choose not to provide location information, some services may not operate effectively.
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk.
- **Website Use Information**, such as browsing behavior on Sightline WM's website and links, location you click, form data and downloads as well as other data gathered from the use of web tools (for example, Cookies, Web Beacons, Tagging) to better understand your interests and needs so that we can serve you better.
- **Other Information**, such as any feedback you may provide to us.

We do not knowingly solicit data from, or market to, children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should Contact Us. We will delete such information from our files.

### PURPOSES FOR THE USE AND DISCLOSURE OF PERSONAL INFORMATION

We may use and disclose your information collected online to:

- Provide and manage the online products and services you have requested;
- Verify your identity and authenticate you;
- Protect against fraud, security threats and otherwise manage risks;
- Communicate with you regarding products and services that may be of interest;
- Evaluate and improve our websites and other electronic offerings;
- Tailor our services and otherwise enhance the customer experience, and
- Satisfy legal or regulatory requirements.

### USE OF WEB TOOLS

We or our service providers may use various tracking tools, such as Cookies, Pixel Tags and Web Beacons, on our website and in our emails and advertisements. Pixel Tags, Web Beacons and similar technologies are tracking tools that may be used on our website and in our emails that monitor user activity. They help us capture user activity for analysis to better understand use and effectiveness of the website and emails, enhance user experience and provide additional security controls.

**Cookies** are a string of data sent between a server and a web browser to, for example, help facilitate the use of a website and to help understand how a website is being used. By registering to use Sightline Wealth Management LP, and/or by making any use of Sightline Wealth Management LP and/or any of the pages or information made available on Sightline Wealth Management LP, you expressly acknowledge and agree that we use cookies.

Different types of Cookies are used for different types of activities. Examples of Cookies we may use are:

- **Session Cookies** enable the website you are visiting to keep track of your movement from page to page so you do not get asked for the same information you've already given to the site. Session Cookies allow you to proceed through many pages of a site quickly and easily without having to

authenticate or reprocess each new area you visit. They are not written to hard drive so they are deleted once you log out or close your browser. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- Flash Cookies are used to improve your website experience by identifying online behaviors and customizing the ads you view to reflect your browsing experience.

Cookies are a commonly used technology and many web browsers default to automatically accept Cookies. If you decide that you do not wish to receive Cookies, refer to your browser's online help for further instruction and information on setting Cookie preferences. If you do not accept cookies, you may continue to browse our websites; however, you should be aware that certain features of our website may not function properly without Cookies. You should note that if you would like to use a service such as MyPortfolio+, you will be required to accept the Cookies to facilitate authentication and navigation inside the application, if you block cookies, you will not be able to use MyPortfolio+.

The information we collect automatically is statistical data and does not include personal information. Unless you elect to complete our contact form, we do not collect information by which you may be personally identified. From time to time, Mailchimp (our marketing communication platform) may obtain information about you from third-party sources, such as social media platforms, and third-party data providers. Sightline Wealth Management LP is not aware of, nor responsible for, the cookie practices of any third-party websites.

Please note,

- **Tagging** is when we place customized code on our websites in order to monitor user activity on our websites. This Tagging software captures user activity and passes it on to a third party for analysis so that we might better understand and enhance the user experience and provide additional security controls.
- **Web Beacons** are small and transparent images embedded in web pages that, when combined with Cookies, help provide a website operator with information about the use and effectiveness of a website.
- **Ad Management Solutions** are tools that enable us to present appropriate ads to users based on previous interests as indicated by websites they have visited. These tools track if you have clicked on a Sightline Wealth Management ad and identify your activity when you clicked on that ad using Cookies and Web Beacons. These tools do not identify you personally, but are associated with the device, such as the computer being used.

## YOUR CHOICES

**Email Communications:** If you prefer not to receive email communications from us (this does not include account related alerts, notifications that are legally required or replies to specific requests) you can unsubscribe by clicking the "Unsubscribe" button provided in the promotional emails you receive from us or notify your Investment Advisor.

**Other Electronic Marketing Communications:** If you prefer not to receive other types of electronic marketing communications please notify your Investment Advisor.

## SAFEGUARDS

We use security controls to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your personal information in our custody or control.

When you access your account online, our custodian (National Bank Independence Network, "NBIN"), NBIN uses multiple layers of protection, such as passwords, firewalls and encryption. We may utilize the services of a third party supplier to help administer our public facing website. When we do, we initiate an extensive supplier assessment process to ensure that the third party's standards and safeguards closely match our own.

## THIRD PARTY LINKS

Our website may contain links to other sites that we do not own or operate. Also, links to our website may be featured on third party websites on which we advertise. We will not provide any of your Personal Information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of, or referral to, the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

## CONTACT US

For more information, please see our Privacy Policy or contact us at:

- Telephone at 1-888-362-7172 or
- E-mail at [compliance@sightlinewealthmgt.com](mailto:compliance@sightlinewealthmgt.com) or
- Mail to:  
Sightline Wealth Management  
Attention: Chief Privacy Officer  
South Tower, Royal Bank Plaza  
Suite 2700, 200 Bay Street  
Toronto, Ontario M5J 2J1