

PRIVACY POLICY

Patrimonica Advisory Inc. ("Patrimonica Advisory"), Patrimonica Asset Management Inc. and its division iNFiNi-t Wealth Management Advisers ("Patrimonica Asset Management and its division iNFiNi-t") are wholly owned subsidiaries of Patrimonica Inc. (hereinafter collectively referred to as the "Firm").

Since its foundation, respecting and protecting confidentiality and personal information have always been the core values of the Firm. The Firm has always been committed to applying the best industry standards when it comes to confidentiality and the protection of personal information and continues to do so. This policy has been drawn up with transparency in mind and sets out the Firm's commitment in terms of confidentiality and protection of personal information. It describes the Firm's practices regarding the processing, collection, use, disclosure, retention, and destruction of personal information.

This policy applies to the Firm's activities and to the products and services offered by the Firm. In other words, it applies when a client invests through the Firm's products and services, when using the Firm's accounting, tax, financial and estate planning services, and when visiting the Firm's website, including the client portal. In addition, it applies to personal information collected on contacts involved in managing and administering the mandates granted, including designated beneficiaries, mandataries, trusted contacts, various advisors, partners and/or spouses, etc.

WHAT IS PERSONAL INFORMATION

Any information about a client that directly or indirectly identifies them is considered personal information ("personal information" or "information"). Name, contact information, home address, e-mail address, date of birth, account numbers, and financial information are considered personal information.

EMPLOYEE RESPONSIBILITIES

Each employee share responsibility for protecting and preserving the confidentiality of personal information to which they have access. We ask employees to be particularly vigilant in protecting personal information. The Firm informs and trains its employees about its legal and regulatory obligations in this regard and requires them to sign an annual code of ethics reminding the importance of protecting personal information. Signing the code constitutes an employee's commitment to this responsibility.

COLLECTION OF PERSONAL INFORMATION

The Firm limits the collection of information as to what is necessary to carry out its offer of products and services, to manage its business, and to maintain and establish its commercial relations.

The types of personal information the Firm collects depend on the type of products and services provided to the customer, as well as the tax, legal and regulatory context. In general, the Firm collects personal information directly through its interactions with the client and through the account opening form. The Firm may also collect information indirectly from third parties or public sources. In particular, the Firm may interact with the following third parties or categories of third parties:

- Patrimonica Advisory;
- Patrimonica Asset Management and its division iNFiNi-t;
- The Firm's agents and subcontractors:
 - technology services: applications, data storage and backup, maintenance and support;
 - registrar of internal funds;

- Financial institutions;
- Various securities stakeholders;
- Legal advisors;
- Accountants;
- Tax advisors;
- Executors;
- Insurance companies;
- Consultants;
- Messaging services;
- Government institutions;
- Other people/services related to financial products and services and to accounting/taxation/financial and estate planning.

Through its Web site, the firm can only collect name, e-mail address and telephone number; no other personal information is collected via the Web site.

Here below is a non-exhaustive list of information the Firm may collect about clients in order to provide its products and services:

- identification and authentication information: this information enables us to communicate with the client, as well as to establish and verify the client's identity (contact details, e-mail address, date of birth, information on identity documents, signature, client account information, etc.);
- information on interactions with the Firm: all information the client communicates to the Firm's employees and representatives (meeting minutes, written or verbal communications, videoconferencing, chat, etc.), communication preferences, etc.;
- banking and transaction information: billing address, account numbers and types, custodian name, transaction history, investment instructions, subscriptions, redemptions, payments received and made, etc.;
- financial information: assets, liabilities, investment knowledge and objectives, risk tolerance, etc. This information enables the Firm, among other things, to determine the client's eligibility for certain products and services (investment funds, financial balance sheet, investor profile, professional and financial background, etc.), as well as to ensure the suitability of the client's financial situation;
- information about other persons: beneficiaries, proxy holders, spouses, and dependents, etc. In the event that information regarding a third party is provided by the client, the Firm will assume that the client is authorized to do so and has obtained that person's consent to its collection, use, or disclosure for the purposes set out in this policy, etc.;
- health information: medical information (such as health care, personal or family medical history), name of health care provider, etc.;
- lifestyle information: liquidity requirements, travel plans, retirement plans, etc.
- estate planning information: asset information, insurance contracts, wills, protection mandates (incapacity mandate), etc.;
- professional or employment-related information: experience, professional designations, occupation, employment history, credit history, driving record, criminal record, etc.;
- other information required by law: this information must be collected by the Firm to meet its legal, tax, or regulatory obligations (SIN¹, tax identification number, proof of citizenship, etc.).

¹ The Social Insurance Number ("SIN") is required for tax purposes, especially if the account generates income and for registered accounts.

USE OF INFORMATION

Patrimonica uses client information to, among other things:

- provide the products and services for which it has been mandated:
 - identifying, updating, and verifying the authenticity of the information provided;
 - establishing an investor profile based on financial needs and objectives;
 - analyzing each client's personal situation to ensure that the products and services offered to clients are adapted and suited to their financial profile and financial, tax, or estate planning objectives;
 - establishing, managing, and administering customer accounts, products, and services;
 - communicating with clients:
 - sending information to clients using suitable means of communication authorized by them;
 - producing and transmitting reports, investment information, statements of accounts, financial statements, official receipts, confirmations of executions and other communications relevant and necessary to the administration of the accounts;
 - proposing products and services that may be of interest to clients;
 - managing and improving the client's relation with the Firm;
- managing the Firm's activities:
 - carrying out day-to-day activities and operations;
 - outsourcing agreements with third parties and service providers to fulfill client mandates;
 - enabling diligent verification of operations;
 - executing client transactions, including transferring funds electronically or otherwise;
 - collecting and recovering fees owed to the Firm;
 - facilitating the sale of one or more parts of the Firm's activities or facilitating the restructuring of the Firm's activities;
- complying with tax, legal, and regulatory obligations:
 - updating personal information contained in client files;
 - preventing and detecting fraud and unauthorized or illegal activities;
 - ensuring the security of information, systems, and networks;
 - complying with tax, legal, and regulatory obligations, requirements, and guidelines;
 - responding to audits and inspections;
 - using and communicating certain information in cases where the Firm is required or authorized to do so by law.

To the extent possible, the Firm will ensure that the personal information held in its clients' files is up to date before using it to make any decision.

DATA PROCESSING DURING USE OF THE FIRM'S WEBSITE

To facilitate the use of the Firm's website or for future communications, the Firm may use cookies to collect information about Internet connection and how and when the website is consulted. The website may also include social media features such as a share button or interactive mini-programs that operate from the website. The Firm's website includes links to other websites that are governed by privacy practices that may differ from those of the Firm.

COMMUNICATION AND SHARING OF PERSONAL INFORMATION

The Firm and its subsidiaries may share personal information with each other when necessary to provide products and services to the client or when required by law. The Firm may also share certain information with its service providers (companies that perform services on behalf of the Firm) as well as with certain third parties (as mentioned under the heading *Collection of personal information*).

All third parties and service providers with whom the Firm do business have been carefully selected and are bound to the Firm by confidentiality and privacy agreements. These suppliers agree to use personal information only for the purposes stated in the agreements and to ensure the same level of confidentiality and protection offered by the Firm. Some of these service providers are located outside Québec; therefore, personal information may be processed or stored outside Québec. In such cases, the Firm will conduct a thorough investigation of the foreign service provider, in addition to ensuring that the information is adequately protected through the signing of agreements, depending on the legal context of the foreign territory.

At all times, the Firm ensures that the sharing of information is limited to that which is strictly necessary, and that consent is received from its clients when required by law. The Firm will never sell client data to third parties and will not provide client lists for marketing, research, or statistical purposes. Moreover, the Firm will not share client data with third parties for any reason other than those mentioned in this policy.

From time to time, the Firm may be required to share certain personal information with courts, competent authorities, or certain regulatory organizations.

STORAGE AND PROTECTION OF PERSONAL INFORMATION

The Firm takes all necessary and appropriate measures to protect against loss, theft, and unauthorized use or modification of the information it holds. Personal information contained in files is therefore accessible only to designated persons who consult it only when necessary, in the performance of their duties.

The Firm makes considerable efforts to protect personal information against loss, theft, unauthorized access, use, or disclosure, and against other security breaches. The Firm monitors the evolution of threats to information security. The Firm ensures the security of information held in several ways, including:

- implementation of security systems at the Firm's business premises to prevent unauthorized access;
- implementation of appropriate protection measures for the Firm's computer systems and the information they contain;
- limiting access to client information. This means that only those employees who need to know certain client information in order to perform their duties have access to it;
- password management and firewall installation;
- signature of the Firm's Code of Ethics by all employees, permanent and temporary, which includes a section on the protection of clients' personal information;
- staff training on privacy and cybersecurity risks;
- obligation for mandataries and service providers who have access to personal information to sign confidentiality and privacy agreements.

Physical personal information is stored in the province of Québec. Digitally stored information is located on servers in Canada. Service providers and other third parties to whom client information is disclosed under this policy may operate outside Québec and Canada. Client information may therefore be used and

stored securely in other provinces and countries. Consequently, customer information may be subject to the laws and access rights of authorities in other provinces and foreign countries.

In the event of a confidentiality incident, the Firm will promptly inform the client, and in the event of an incident presenting serious prejudice, the Firm is obliged to notify all persons concerned by the incident, as well as the *Commission d'accès à l'information*.

Clients also have a key role to play in protecting their information. The Firm urges customers never to divulge their passwords, codes, personal identification numbers, or any other sensitive information.

LENGTH OF RETENTION OF PERSONAL INFORMATION

The Firm may, subject to applicable law, retain a client's personal information in its files for as long as necessary for the purposes specified in the Policy and in accordance with the retention periods set out in the various laws, even if an individual/entity ceases to be a client. The Firm is subject to many legal obligations regarding the retention of personal information (for example, under securities, tax, and anti-money laundering laws).

Other considerations, such as the purpose, nature, and sensitivity of the information, were taken into account when determining retention periods.

Certain exceptions may apply and require longer retention periods, for example, in the case of litigation or claims. When client information is no longer required, the Firm will use reasonable efforts to securely destroy or anonymize it².

ACCESS AND RECTIFICATION RIGHTS

Under the laws governing personal information, all clients have the right to access information held by the Firm concerning them. This right also includes the right to have incomplete or inaccurate information corrected. To do so, the client needs only submit a request to their representative or advisor.

Clients may also request further information concerning the purposes for which their information is collected, the means by which the information is collected, their rights of access and rectification as provided by law, and their right to withdraw consent to the communication or use of the information collected. Clients may also ask to be informed of the personal information collected from them, the categories of people who have access to information within the company, how long this information is kept, and the contact details of the person responsible for protecting personal information.

The Firm has 30 days to respond to a request for access or rectification following receipt of the request.

CLIENT CONSENT

The client's consent is required to allow the Firm to collect their personal information and use it for the management and administration of the products and services. The Firm will only use client information with the client's consent or to the extent permitted by law. The client may withdraw consent subject to legal obligations regarding the retention of personal information and contractual requirements. However, in the absence of consent, the Firm may not be able to provide certain products and services, in whole or

² Information concerning an individual is anonymized when it no longer irreversibly allows that person to be identified, neither directly nor indirectly.

in part. This policy will apply to a client's information for as long as it is held by the Firm and when an individual/entity ceases to be a client.

The Firm obtains the client's consent to collect, use, and disclose personal information in these situations:

- when a client invests using the Firm's products and services, when using accounting, tax, financial, and estate planning services;
- when the Firm needs to use the client's information for purposes other than those for which the client has already given consent.

The client may withdraw their consent by communicating with their representative, advisor or by sending an e-mail to the Privacy Officer (see next section).

PRIVACY OFFICER

The Privacy Officer is responsible for ensuring compliance with this policy and its implementation. It is the person to contact if you have any questions about the protection of personal information or if a request for access or rectification of personal information is made. The Privacy Officer also oversees the administration of complaints relating to the management and protection of personal information.

Privacy Officer

conformite@patrimonica.com

1130 Sherbrooke Street West, Suite 200

Montréal QC H3A 2M8

HANDLING OF COMPLAINTS

The client may submit a complaint to the Privacy Officer regarding any dissatisfaction with the protection of personal information. Whenever possible, the Firm will handle, in a confidential manner, reports, concerns, complaints, or incidents involving conduct that violates the Policy. However, disclosure may be required for investigation purposes to adequately address the concerns raised and implement an action plan where appropriate.

POLICY MODIFICATION

The Firm has the right to modify this policy at any time. Any changes will take effect on the day the revised policy is posted on the Firm's website.

APPLICATION OF THE POLICY

This policy applies to Patrimonica Advisory Inc., Patrimonica Asset Management Inc. and its division iNFIni-t Wealth Management Advisers.

QUESTIONS

Should the client have any questions regarding the laws and regulations governing the protection of personal information, they may contact the *Commission d'accès à l'information* or the *Office of the Privacy Commissioner of Canada* at:

Commission d'accès à l'information

500 René-Lévesque Blvd. West
Suite 18.200
Montréal QC H2Z 1W7
Telephone: 514-873-4196
Fax: 514-844-6170
Toll-free telephone: 1-888-528-7741
E-mail: cai.communications@cai.gouv.qc.ca

Office of the Privacy Commissioner of Canada

30 Victoria Street
Gatineau QC K1A 1H3
Telephone: 819-994-5444
Fax: 819-994-5424
Toll-free telephone: 1-800-282-1376