

SECUTOR

CAPITAL MANAGEMENT

The Collection and Use of Personal Information by Secutor Capital Management Corporation

When you open an account with Secutor Capital Management Corporation ("SCMC") we will obtain personal information about you, which is kept on file in accordance with industry regulations. Only authorized individuals and entities have access to this information. This collection of data permits SCMC to both tailor products and services specifically to your needs and satisfy legal and regulatory requirements.

Social Insurance Number (SIN)

If you are an individual, SCMC will disclose your SIN number to Canada Revenue Agency for tax reporting purposes.

Disclosure of Personal Information to External Sources

SCMC will disclose your personal information to its carrying broker National Bank Independent Network and therefore the service providers they use in order to provide you with necessary services, such as, but not limited to, record keeping and the creation of statements. SCMC may also verify certain information provided by you with other external sources, namely, but not limited to, your banking institution. Such matters typically being to determine if an account is open with that institution and in good standing.

Consent

Your consent is required before SCMC can provide your information to any third party. The consent that you provide to SCMC with regards to the collection, use and disclosure of your personal information may be cancelled at any time by providing written notice to SCMC. By law SCMC does not require your consent to collect, use and disclose your personal information where:

- Such collection, use and disclosure is reasonably required in the normal course of business, namely the providing of investment advice and services to you;
- For the collection of debts owed to SCMC by you;
- To a law enforcement agency or government securities regulatory authority; and
- To SCMC's legal counsel for the purposes of obtaining advice.

By opening an account at SCMC, you are providing consent to SCMC to collect, use and disclose your personal information as set out in this disclosure.

Corrections to Personal Information

You can review your information held by SCMC at any time and make corrections to it. We require that such corrections be submitted in writing. You should address all corrections, questions or privacy-related complaints to the Chief Compliance Officer, Secutor Capital Management Corporation 1167 Caledonia Rd, Toronto, Ontario, M6A2X1

Retention of Personal Information

SCMC may retain your personal information on file even if you cease to be a client of SCMC for as long as SCMC is required to maintain such information by either law or a government securities regulatory agency, or a Self-Regulatory Organization (IIROC, MFDA, Bourse de Montreal, CIPF).

SRO Access to Personal Information of Clients and Others for Regulatory Purposes

For regulatory purposes, SRO's require access to personal information of current and former clients, employees, agents, directors, officers, partners and others, that has been collected or used by SCMC. SRO's collect, use or disclose such personal information obtained from SCMC for such regulatory purposes, as:

- Surveillance of trading-related activities,
- Sales and financial compliance audits, trade desk reviews, and other regulatory audits,
- Investigations 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.

BY OPENING AN ACCOUNT AT SCMC, YOU ARE PROVIDING CONSENT TO SCMC TO COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION AS SET OUT IN THIS AGREEMENT.