

PRIVACY POLICY

At Waypoint Investment Partners (“Waypoint”), we are committed to maintaining the highest level of confidentiality regarding your personal information. We are governed by Canadian private sector privacy laws including the Personal Information Protection and Electronic Documents Act (PIPEDA) and Provincial legislation (where applicable), which regulates the private sector's collection, use and disclosure of personal information. No employee may release confidential client information, including the fact that an individual may or may not be a client of the firm, unless required by law or with the individual's appropriate consent.

WHY DO WE NEED THIS INFORMATION?

Personal information is information about an identifiable individual and includes, but is not limited to, your name, address telephone number birth date, Government issued identification (passport, driver's license, provincial health card), as well as your financial and investment information. This information may be collected through account applications or other forms, or through conversations or other correspondence with you.

Please note that we will only collect and use your Social Insurance Number to the extent required by applicable law.

We collect this and other information about you in order to:

- identify in accordance with Government and securities regulations
- understand your investment needs
- make appropriate investment decisions on your portfolio
- manage the administration of your account
- inform you of services we offer that may be relevant to you
- satisfy legal, regulatory, custodial and tax reporting requirements
- contact you or your designated representatives

We have established practices and procedures to ensure that the information entrusted to us is appropriately safeguarded and have appointed a Privacy Officer to administer this process. On an annual basis, each one of our Team members is required to certify that they will uphold and comply with our internal policies including confidentiality and safeguarding of client information.

YOUR CONSENT TO ITS USE

Our conversations with you as well as the Waypoint Account Opening documents (provided by National Bank Independent Network); the Waypoint Investment Management Agreement and the Waypoint Investor Profile capture the information we require in order to comply with our legal and regulatory obligations in managing your account(s). Your execution of these documents is your consent to the collection and use of this information for its intended purpose. You may withdraw your consent at any time, however be advised that such withdrawal, may impact the services we are able to provide to you.

We use service providers in various aspects of the services we provide to you, including, but not limited to, custodians, transfer agents, administrators, storage facilities, information technology providers, auditors, lawyers and other third parties. These third parties will be provided with the information necessary to perform their required services. Written agreements are in place with each of these providers in which confidentiality and privacy requirements are clearly identified to ensure such service providers maintain privacy and security standards that are comparable to ours. If we are required to disclose your personal information to domestic and international governmental agencies, and other regulators we will only do so where required by law.

Some of the recipients who we disclose your personal information to as contemplated in, and in accordance with, this privacy policy may be located in jurisdictions outside Canada. As a result, your

personal information may be used, stored and/or accessed in countries outside of Canada, including without limitation the United States. However, all such personal information will be protected in accordance with this privacy policy. Please note that when your personal information is located outside of Canada it will be subject to the laws of the country in which it is situated and these jurisdictions may not have an equivalent level of data protection laws as those in Canada.

ACCURACY AND RETENTION OF YOUR INFORMATION

Waypoint Representatives with whom you interact understand that the accuracy of the information you have provided is essential to the effective management of your account(s). Should they, or you, feel the information we have requires updating, you may be asked to update our records through the completion of our Investor Profile document or other means.

You may access your personal information at any time, by contacting your Waypoint investment professional or our Privacy Officer.

We are committed to ensuring the accuracy of the information we maintain on your behalf and will correct or amend any information which is determined to be incorrect or deficient within 30 days. We keep your personal information for as long as we need your personal information for the purposes for which it was collected or as otherwise permitted by applicable law after which we delete or anonymize your personal information rendering it unable to identify you.

If you have any concerns regarding the accuracy of the information we have on file for you do not hesitate to contact your Waypoint representative or the Firm's Privacy Officer.

SAFEGUARDING YOUR INFORMATION

Safeguarding your information is a fundamental principle at Waypoint. We protect personal information against loss and theft as well as unauthorized access, disclosure, copying, use, and modification using security safeguards, including physical, organization and technological measures, commensurate with the sensitivity of your personal information. To this end, we have implemented the following policies:

- Our premises are secured by card access limited to only those individuals requiring access to our premises outside of normal business hours.
- After normal business hours, staff are required to secure confidential client information in locked cabinets.
- Copies of documents no longer required to manage your account(s) are placed in secure document destruction bins
- Personal information in the form of electronic data is stored within our computer systems using firewalls, passwords and transmission encryption programs.
- All electronic data is backed up daily at an offsite storage facility which maintains industry standard security systems.

INQUIRIES

Please direct your communication:

In writing to:

Waypoint Investment Partners
1133 Yonge Street, Sixth Floor
Toronto, ON M4T 2Y7
Attention: Privacy Officer

By email to:

Compliance@waypointinvestmentpartners.com

We are committed to responding to your inquiries on a timely basis.