



Caldwell Securities Ltd. (“Caldwell”) respects your privacy and is committed to protecting it through our compliance with our policy, a copy of which is available upon request (email: [privacy@caldwellsecurities.com](mailto:privacy@caldwellsecurities.com))

We will only use your personal information in accordance with our policy unless otherwise permitted or required by applicable law. We take steps to ensure we only collect personal information required to provide you with the services you have obtained, ensuring what we collect about you is adequate, relevant, not excessive, and is used and disclosed for purposes of servicing you and as may be required by law.

Privacy laws in Canada generally define “personal information” as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

### **HOW WE OBTAIN YOUR CONSENT**

You provide your consent for Caldwell to collect, retain and use your personal information in a number of ways.

- Before or at the time you open an account with Caldwell, you will be required to provide certain personal information to establish the account. The information may be collected via a Caldwell New Client Application Form (commonly known as an “NCAF”), in which case you will formally indicate your explicit consent when you sign the application.
- You may also consent to communications directly from a Caldwell investment advisor by providing your email, phone number, address or other contact details directly to that advisor, in which case you have implied your consent to be contacted.
- By using our website, you consent to the collection of technical and website interaction information (see “Information we collect about you”) automatically through our website

### **WITHDRAWING YOUR CONSENT**

You are always in control of your personal information and providing us with your information is always your choice, except where required by law.

You can withdraw your consent to the processing of your personal information (where we are processing your personal information based on your consent). If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect your decision in accordance with our legal obligations. However, your decision to withhold particular information or to stop processing your information may limit or prevent us from providing investment or financial advice based on your specific needs or providing products or services you have obtained. This may result in the closure of your account and you will be responsible for any fees and taxes associated with the disposition of your investments with us.

If you do not wish to receive promotional materials from us you may contact your investment advisor, or, if you are uncomfortable doing so, contact one of our privacy officers listed in “Contact Information”.



Regulated by  
Investment Industry Regulatory  
Organization of Canada





## **INFORMATION WE COLLECT ABOUT YOU**

We collect and use several types of information from and about you, including:

- **Information establishing your identity** such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address, user name or other similar identifier, social insurance number, date of birth,
- **Information you provide on an application** for products and services (and subsequent updates), such as annual income, place of employment, investments, account holdings, beneficiary information, financial information, billing and account information and transaction history.
- **Information to authenticate your identity**, such as knowledge-based information (i.e. username, password, security questions or account information) and signature.
- **Banking Information you provide** to facilitate deposits and withdrawals to your account or to facilitate the settlement of fund purchases, redemptions, distributions and other similar transactions.
- **Information you provide during communication with us** which may include telephone numbers, family details, life events, alternate contact details, goals and your opinions and issues you may have encountered.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment Also, if you communicate with us via electronic means, you are providing us with your email details.
- **Information you provide to establish your eligibility for certain products.** Certain investment products are only available to qualifying eligible investors, such as accredited investors. You must provide us the information to support and validate your eligibility before we are able to sell you these products.
- **Electronic mail and contact information**, in order to receive any electronic messages from us which you may have subscribed to via our website, through completing an account application, or in speaking with a Caldwell representative.
- **Website interaction information**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our client service number.
- **Additional information** may be requested to help us determine your eligibility for products and services that we offer.



## **HOW WE COLLECT INFORMATION ABOUT YOU**

**Most of the information is collected when you interact with us**, for example when you:

- apply for a product, service or account with us; or
- communicate or interact with us in email, written or verbal communications;

**We also collect financial, technical and other information about you from a variety of sources** including through:

- transactions you have made with us; or
- third parties or publicly available sources, for example, references you provide to us, credit bureaus and reporting agencies, our business partners, other financial institutions, and from regulatory, government and similar authorities; or
- automated technologies or interactions, as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies

## **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- **To provide you with products, services or information requested and otherwise service your account**, which includes making tax payments or reports, meeting legal requirements to verify your identity, checking your credit history where required, recording beneficiary information and providing you with account statements, confirmations, tax receipts, notices about your account or other requested reports.
- **To execute securities transactions on your behalf** and advise you concerning your securities transactions or send you communications of a transactional nature.
- **To meet regulatory, legal and governmental requirements** and to carry out our obligations and enforce our rights arising from any contracts with you, including managing our risks and operations.
- **To verify your identity and to authenticate you when you contact us.**
- **To inform you of the financial products and services that you may be eligible for**, or communicate to you any updates, benefits, features and other information about products and services you have with us, or to better understand your financial situation and goals to determine your eligibility for products and services we offer and to manage your products and services with us.
- **To compile non-personal information that does not directly or indirectly reveal your identity** or directly relate to an identified individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of clients using a particular service.
- **To present our Website and its' contents to you**, notify you about changes to our Website or any products or services for ongoing communications.
- **To fulfill any other purposes for which you provided the information** or that were described when it was collected, or any other purpose for which you provide information and consent to its' use.



## **DISCLOSURE OF YOUR INFORMATION**

We may disclose aggregated information about our users and clients, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide in order to fulfill our obligations. We may disclose to:

- **mutual fund companies, issuers or other intermediaries for securities** where you wish to purchase units or for securities in which you hold shares for purposes of distributing shareholder information.
- **our regulators** (including the provincial Securities Commissions, the Investment Industry Regulatory Organization of Canada, the Canadian Investor Protection Fund and federal and provincial governments). These regulatory bodies collect, use or disclose such personal information obtained from us for regulatory purposes, including surveillance of trading-related activities, regulatory audits, investigations of potential violations of rules or laws, enforcement or disciplinary proceedings, and information sharing with other regulatory organizations in connection with any of the foregoing.
- **our subsidiaries and affiliates**, including Caldwell Financial Ltd., Caldwell Investment Management Ltd., and Caldwell Insurance Services Ltd. in connection with ongoing servicing of your accounts.
- **a buyer or other successor** in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the assets of Caldwell, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Caldwell about our clients and users is among the assets transferred (in accordance with applicable law).
- **contractors, service providers, and other third parties we use to support our business** and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in our policy.
- **fulfill the purpose for which you provide it** or for any other purpose disclosed by us when you provide the information, and with your consent.

We may also disclose your personal information:

- **To comply with any court order, law, or legal process**, including to respond to any government or regulatory request, in accordance with applicable law.
- **To enforce or apply our agreements with you**, including for billing and collection purposes.
- **To protect the rights, property, or safety of Caldwell, our clients, or others** (if we believe disclosure is necessary). This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit, financial or operational risk reduction.



## **TRANSFERRING YOUR PERSONAL INFORMATION**

When engaging our service providers or through the use of new technology we may process, store, and transfer your personal information into the U.S.A., a jurisdiction with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to our policy and applicable Canadian privacy legislation.

You are welcome to contact us to obtain further information about Caldwell policies regarding service providers outside of Canada. See the “*Contact Information and Challenging Compliance*” section below. By submitting your personal information, engaging with the Websites, or using our products and services, you consent to this transfer, storage, or processing.

## **DATA SECURITY**

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Please be aware though that, despite these efforts, no security measures are perfect and no systems are impenetrable. Your privacy can be enhanced by taking care to use suitably strong passwords that others cannot guess, that are kept safe by you, and that are not re-used on other sites. Taking steps like avoiding dictionary words or proper names, and adding extra characters and punctuation marks can also help protect you. If you believe your password has been compromised, you should change it immediately.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures used by Caldwell.

Our Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy and security policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy and security policies of every website you visit.

## **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When you open an account with us, most information you provide is required to be retained for at least seven years from the date you close your account.

Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you. You may receive a copy of the personal information we have on file at minimal or no cost to you by contacting our privacy officers listed below.



If you want to review, verify, correct, or withdraw consent to the use of your personal information you may contact us using the contact information set out below. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **CHANGES TO OUR PRIVACY POLICY**

We may update this privacy policy from time to time to reflect changes in our privacy practices and will post revised disclosure to our website (<https://www.caldwellsecurities.com>). Changes are effective immediately and you are to periodically review the privacy policy to see whether it has changed.

To ensure you receive important notices from us, you are responsible for providing us an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### **CONTACT INFORMATION AND CHALLENGING COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices.

Please contact us at:

Privacy Officers: Brandon Boyd or Sally Haldenby-Haba

150 King Street West Suite 1710 Toronto ON M5H 1J9

Telephone: 416-862-7755 Fax: 416-862-9438

Email: [privacy@caldwellsecurities.com](mailto:privacy@caldwellsecurities.com)

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with our policy, and with applicable privacy laws. To discuss our compliance with our policy please contact one of our Privacy Officers using the contact information listed above.

In the event you find our proposed solutions unacceptable, you may escalate your complaint to the regulators directly:

The Privacy Commission of Canada  
112 Kent Street  
Ottawa, Ontario K1A 1H3  
Phone: 613-995-8210 or 1-800-282-1376

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Investment Industry Regulatory  
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