

## **SECTION 17 PROTECTION OF PERSONAL CLIENT INFORMATION**

On January 1, 2004, a new Federal privacy law called the Personal Information Protection and Electronic Documents Act (known as PIPEDA) came into effect. It has provisions relating to the collection, use, and disclosure of personal information by all companies and organizations in the course of commercial activity.

All information concerning the client's transactions and his or her accounts must be considered confidential and must not be disclosed except with the client's permission or by order of the proper authority. The Approved Persons and Marketing Assistants must refrain from discussing client information with anyone outside his or her firm, and must also ensure that the client lists and other confidential records are not left out where they can be taken or observed by visitors.

For greater certainty, the following conduct would amount to a breach of an Approved Person's obligations to his or her client:

- discussing the identity of a client with any person or entity other than a director of Altimum, such as a third party where he or she has not been expressly authorized by Altimum to do so,
- discussing a client file, or any details thereof, with any person or entity other than a director of Altimum, such as a third party where he or she has not been expressly authorized by Altimum to do so,
- discussing a client file, or any details thereof, in a location or in a manner that may be overheard by unauthorized third parties,
- failing to keep client documents safe and secure at all times,
- allowing a client name or file name to be displayed in any non-confidential setting,
- discussing, divulging, disclosing, revealing, or using client information for one's personal benefit or for the benefit of any other person or entity.

Violation of a client's confidentiality leaves one vulnerable to a civil lawsuit.

Neat, legible records, which are readily accessible and understandable by others in the Approved Person's absence, should be maintained.

Access to files may only be permitted to registered staff. Non-registered assistants may only file paperwork.

It is the policy of Altimum Mutuals Inc. that every existing client, officer, director, partner, employee or agent as of December 31st, 2003 and every individual who becomes a client, officer, director, partner, employee or agent after December 31st, 2003 sign for having received an Investor Privacy Notice to authorize Altimum Mutuals Inc. to have such personal information on file.

Altimum Mutuals Inc. has also been authorized by Altimum Insurance Agency Ltd. to collect such information on its behalf with regard to any shared clients insofar as a client of Altimum Mutuals Inc. may deal with Donald Reid regarding life insurance.

## *Client Confidentiality and Electronic Communications*

### *Communicating with Head Office*

To protect the confidentiality of client information being sent between Approved Persons and Head Office, Altimum Mutuals Inc. requires that all such confidential information, including but not limited to account application forms, changes of banking information, client statements, purchase and redemption forms, cheques and sample void cheques, and KYC updates must not be sent by e-mail other than an approved, encrypted, password-protected e-mail account authorized by Altimum and referred to in the section entitled Cybersecurity and Computer Usage Policy. Approved persons are required to scan the documents and then to send them by means of such secure e-mail to Head Office for processing unless they are faxing in the documents or delivering them in person. Use of g-mail and other e-mail providers, including Outlook (with the exception of a secure, encrypted, password protected Outlook e-mail address if one is provided to the representative), is prohibited when sending or receiving confidential client information. Their use is NOT approved by the Company and is NOT considered to be an acceptable means of communicating confidential client information.

### *Communicating with Clients*

Likewise, it is required that the confidentiality of client information being sent from Head Office or from any Approved Person or other person acting on behalf of the Company to a Client or a person or corporation acting on behalf of a client (with suitable authorization on file) be protected. Therefore, the only acceptable means of sending confidential client information out of the Company, including but not limited to client statements and proposals which include such confidential information, shall be the following:

- 1) Client pickup directly from the Representative or from Head Office.
- 2) Delivery in person by the Representative to the Client's home (or office if authorized to do so).
- 3) By mail, either Expresspost, Registered Mail or regular mail,
- 4) By Fax machine, if authorized by the client to do so,
- 5) By use of a secure, encrypted, password protected e-mail account if such an account is provided by Altimum,
- 6) By use of such other means as has been previously approved by the Company.

**INVESTOR PRIVACY NOTICE**

As an organization that collects, uses and discloses personal information, **Altimum Mutuals Inc.** is subject to the federal *Personal Information Protection and Electronic Document Act* (or by similar laws in the provinces of Alberta, British Columbia and Quebec), effective January 1st, 2004. In complying with these laws, it is important that Altimum Mutuals Inc. provides you with information so that you may fully understand the purposes for which your personal information is collected.

Over the course of your relationship with **Altimum Mutuals Inc.** and your investment funds advisor, personal information will be collected in order to administer your mutual fund account. This information typically includes your financial information and investment objectives, in addition to your current investments, banking information and your social insurance number. This information allows for but is not limited to the buying and selling of mutual funds on your behalf, in addition to providing you with reporting and the administration of your account in a compliant and regulatory manner.

At times, **Altimum Mutuals Inc.** may be required to provide this information to mutual fund companies in which you invest, self-regulatory organizations, securities regulators, law enforcement agencies and to companies that perform services on our behalf. These organizations, like **Altimum Mutuals Inc.** are bound and must comply with the same federal/provincial privacy act(s). **Altimum Mutuals Inc. does not disclose your information to any other organization(s) to use for their own purposes and in particular will never sell or trade your personal information.**

The purposes for which we collect, use and disclose your personal information are central to our being able to provide you with our services. Should you have objections to the collection and disclosure of your personal information, as listed in the foregoing, **Altimum Mutuals Inc.** will no longer be in a position to provide you with these services. Therefore, by maintaining your account with **Altimum Mutuals Inc.** we will consider that you have consented to our collecting, using and disclosing your personal information.

In representing **Altimum Mutuals Inc.** your investment funds advisor is acting on behalf of the mutual fund dealer, **Altimum Mutuals Inc.** Your investment funds advisor may also be licensed to sell other products and, therefore may wish to provide you with advice and services in that other capacity. Should they do so, your investment funds advisor will communicate with you directly regarding any additional use or disclosure of your personal information.

If you wish to review or make changes to your personal information you may do so by making a written request to:

**Privacy Officer,  
Altimum Mutuals Inc.,  
94 Barbican Trail,  
St. Catharines, ON L2T 4A8**

Should you have any questions or concerns regarding the use of your personal information we encourage you to speak with your investment funds advisor. Alternatively, you may contact the designated Privacy Officer at:

**Altimum Mutuals Inc.,  
94 Barbican Trail,  
St. Catharines, ON L2T 4A8  
(905) 680-8544**