



## **Code for the Protection of Personal Information**

We require certain personal information from our clients to perform our duties. A significant amount of that information is collected to satisfy regulatory requirements. We treat all client personal information with the utmost of care and confidence. We do not share client personal information with any other third party unless we are required to by law or regulation.

We are committed to respecting and protecting the privacy and confidentiality of our clients' personal information. This Code applies to the operations of Deans Knight Capital Management Ltd. (DK) and all of the services and products DK provides to its clients. Reference throughout this Code to "we", "our" and "us" means DK.

### **Employee Responsibilities**

Each and every one of our employees is responsible for maintaining the confidentiality of all personal information to which they have access. As a condition of employment, our employees are required to sign a confidentiality agreement binding them to this responsibility which governs their actions, even if they leave or retire from DK.

We keep our employees informed about our policies and procedures for protecting personal information and reinforce the importance of complying with them. All employees are also required, as a condition of employment, to conform to these policies and procedures.

DK has designated Michael Schaab its Privacy Officer, the individual who is accountable for its compliance with this Code. Any questions, requests or complaints should be directed to this individual at the address below.

### **What Is Personal Information**

The term "personal information" refers to information that specifically identifies a client as an individual and is provided to or collected by us. It includes information that the client provides or that we collect from other sources with their permission, for example: client name and address, age and gender, personal financial records, identification numbers including your social insurance number, personal references, and employment records.

### **Why We Ask For Personal Information**

We want to work with our clients to help them achieve their financial goals, to provide them with value-added service on an ongoing basis, and to establish a lasting financial relationship with them that will grow and change as their financial needs evolve.

The better we know our clients, the better we are able to serve them. We therefore ask for personal information for the following purposes:

- to verify our clients identity and protect against fraud,
- to understand our clients' financial service requirements,
- to determine the suitability of products and services for our clients,
- to offer our clients products and services that may be of interest to them,
- to set up and manage products and services that our clients have requested, and
- to comply with laws and securities regulations.

For example, we ask for detailed personal information to ensure that the investment products our clients are invested in are appropriate for them and suitable for their circumstances. The majority of the information we will ask for and

use, either at the time of account opening or on an updated basis is required to satisfy the legal or regulatory requirements of federal and provincial governments and/or other regulatory authorities.

### **Obtaining, Verifying and Accessing Your Personal Information**

We obtain personal information about our clients primarily from them through initial meetings and account opening documents.

If clients want to review or verify their personal information, or find out to whom we have disclosed it as permitted by this Code, they can ask at our Vancouver Office. At that time, we will need specific information from the client to provide them with the personal information we hold about them.

### **Keeping Your Personal Information Accurate**

We are committed to maintaining the accuracy of client personal information for as long as it is being used for the purposes set out in this Code, and provided that clients keep us up-to-date. We rely upon prompt notification from clients of any changes, such as address or telephone number, to help us provide you with the best possible service. We will make our best efforts to advise others of any important amendments to your personal information that we may have released to them.

### **Releasing Your Personal Information**

DK does not sell your personal information to third parties.

DK does not disclose your personal information to third parties other than in the following circumstances or for the following purposes:

- in connection with normal business operations to open, maintain, administer, or service your account, including, without limitation the mailing of materials and the scanning of account documentation into customer databases, the provision of customer service (including services rendered by third party agents or affiliates), the provision of back office administrative services (including clearance and settlement services, the mailing of account statements and reviews, and record-keeping services), for audit purposes;
- to DK affiliated companies, in order to provide clients a wider range of services and better service their customer service expectations, to ensure that any updated contact information they provide is processed efficiently, and to engage in surveillance, compliance, and reporting activities required by applicable law;
- to legal counsel for the purpose of obtaining legal advice;
- where we are required or permitted to do so by law, including to any law enforcement agency, securities regulatory authority or self-regulatory organization;
- in connection with offers made to DK customers or prospective customers, or other promotional activities or service offerings engaged in by DK where (A) third party product or service providers assist DK or otherwise participate in fulfillment of the offer or provision of the service; (B) DK has contracted with a third party for the fulfillment of the offer or provision of the service or otherwise has an ongoing business relationship with such third party; (C) fulfillment of the offer or provision of the service requires disclosure of certain limited personal information for fulfillment purposes only to such third party; and (D) in an aggregated form for the purpose of analyzing statistics and metrics about DK's business and operations.

**By opening or maintaining an account with DK or using our services, you have consented to the disclosure of your personal information to a third party in the circumstances or for the purposes described above.**

### **Keeping Your Personal Information Confidential**

Personal information is protected at DK by safeguards that are reasonable to the sensitivity against loss or theft and against unauthorized access, disclosure, copying, use or modification. Safeguards include physical protection (such as locked cabinets and restricted access to offices), organizational measures (such as access clearances) and technological measures (such as passwords and encryption).

In circumstances where we use third parties to provide services to you on our behalf, such as administrative functions or trade processing, they are given only the information needed to perform those services. We have contracts in place holding these companies to the same high standards of confidentiality by which we are governed and require that any information provided by us must be kept strictly confidential and used only for the purposes of the contract.

We have procedures in place when destroying, deleting, or disposing of personal information when it is no longer required for the purposes set out in this Code, or by law.

### **Retention of Your Personal Information**

We only keep your personal information for as long as we need it to meet the purposes set out in this Code. The length of time we retain your personal information depends on:

- the type of product or service you have with us, and
- any legal or regulatory requirements we may have to meet.

For example, we must be able to respond to any concerns you may have, even if you are no longer a client of ours. We have retention policies in place that govern the destruction of personal information. Generally, our policy is to retain records for 10 years after they are no longer current.

### **Your Options**

You can choose not to provide us with some or all of your personal information. You can also withdraw your consent to our use of your personal information, as long as:

- you give us at least sixty (60) days written notice;
- there are no legal requirements for the use of your personal information; and
- we can continue to fulfill our contractual obligations to you.

If you would prefer not to receive offers of other DK products and services that may be of interest to you, you can make this request directly with us.

Please direct questions, requests or complaints to the attention of:

Michael Schaab  
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Vancouver, BC  
V6C 2W2  
privacy@deansknight.com