



## HAYWOOD PRIVACY POLICY

### **Haywood and Your Privacy**

Haywood Securities Inc. considers your personal privacy to be an important part of our service to you. We understand the need to safeguard information about you that you have entrusted to us. As part of our commitment to you we have adopted principles designed to protect your privacy and prevent misuse of your personal information and help you understand our commitment to your personal privacy.

References to “Haywood”, “we” or “our” are to Haywood Securities Inc. and its subsidiaries and affiliates, depending upon the context. Where we use the term “personal information” we are referring to any information that identifies you as an individual, whether directly or indirectly, and includes information with respect to your name, address, age, gender, income, marital status, finances, employment, trading history and web site use information, together with your personal references and identification numbers (such as a social insurance number).

Our privacy policy applies to personal clients, including individuals carrying on business alone or in partnership with other individuals. The following sections will answer most of the important questions that you may have about how we gather, protect, and use personal information, and how we will hold ourselves accessible and accountable to you.

### **Haywood’s Principles on Privacy**

We have incorporated certain principles for the protection of personal information in our privacy policy.

*Collecting and Using Personal Information* – We will explain how we intend to use your personal information prior to or when we are collecting it, and we will limit the personal information we collect to what we need for those purposes. We will use the personal information we collect only for those purposes we have explained to you, and we will obtain your consent if we wish to use your personal information for any other purpose.

*Disclosing Personal Information to Others* – We may provide your personal information to other persons not affiliated with Haywood, such as regulators, tax authorities, service providers, credit reporting agencies or other parties involved in a business transaction, but only where we have your consent or where we are required or permitted to do so by law.

*Retaining and Protecting Personal Information* – We will retain your personal information only for the time it is required for the purposes we explain or as otherwise required by law in accordance with our information retention policies.

We will protect the personal information obtain about you with appropriate safeguards and security measures. Upon request, we may provide you with additional information regarding the retention period of your personal information.

*Access and Accuracy* – We will provide you with reasonable access to your personal information on record with Haywood and information about Haywood’s use and disclosure of that information. We will make every reasonable effort to keep your personal information accurate and up to date.

*Accountability and Openness to Your Privacy Concerns* – We will hold ourselves accountable to you and we will investigate and respond to your concerns about any aspect of our handling of your personal information. We will explain the application of our privacy policy to your personal information and explain your options of refusing or withdrawing consent to the collection, use and release of your personal information, and we will record and respect your choices.

### **Why Does Haywood Collect Personal Information?**

We collect, retain, and use personal information about you only when we reasonably believe that it is necessary to administer our business and for the specific business purpose of providing products, services, and other opportunities to you as our client.

Your social insurance number is part of your personal information we are required to collect, and is required for products that earn investment income, in order to comply with the Canada Customs and Revenue Agency’s income reporting requirements. Providing your social insurance number for credit reporting purposes is optional. If you provide your social insurance number, we also use it to keep your personal information separate from that of other clients with a similar name, including information we obtain with your consent through the credit approval process. Health information may be required for some insurance products to ensure you are eligible for coverage. Health information that may have been provided in connection with any insurance product is never shared.

Haywood may use your personal information to provide you with information about Haywood’s products and services and other matters. This consent is optional, and you can decide to withdraw it at any time. Please refer to the section regarding your options below.

### **How does Haywood Collect Personal Information?**

We obtain most of the information about you directly from you primarily through our account opening forms which you complete with our personnel.

With your consent, we may obtain personal information about you from third parties. For credit or margin purposes, for example, we may need to know your creditworthiness. For this reason, we may contact other lenders or credit reporting agencies to give us information on your credit history. We may also contact references you have provided to verify information that you have given us. We will

not do this without your consent, but please remember that if you do not give your consent, we may not be able to extend credit or margin services to you.

### **When Does Haywood Release Personal Information?**

Haywood does not sell client lists or personal information to others.

We do not reveal personal information about you to parties outside our affiliated companies for their independent use unless you request or authorize it, the information is provided to complete a transaction initiated by you, or the disclosure is otherwise lawfully permitted or required. We may disclose information to the authorities to serve a clear public interest and fulfil our public duty – such as to protect against fraud, money laundering or other criminal activity. We may, from time to time, be requested to disclose information to securities regulatory and securities oversight organizations to which we are subject, such as the Investment Industry Regulatory Organization of Canada, for the purposes of an audit or investigation relating to specific accounts or our business generally. In certain circumstances, Haywood may disclose your personally identifiable information if it believes, in good faith, that disclosure is otherwise necessary or advisable to protect its interests.

Sometimes it is necessary to provide personal information about you to a party outside our affiliated companies, such as to a vendor or service company that we hire to do our data processing or prepare your account statements or to provide support or services for one or more of our products. These vendors and service companies agree to safeguard confidential information about you and your products and services with us and must abide by applicable law.

With your consent, we may share your personal information, where not prohibited by law, to affiliated companies of Haywood for the purposes of referring life insurance, disability insurance, annuities and other specific insurance products and services to you.

### **Does Haywood Provide Options?**

It is always your choice whether to provide personal information or to consent to our obtaining personal information about you from third parties. In many cases you are free to refuse or withdraw your consent at any time. If you choose not to provide requested personal information or consents, we may not be able to provide certain products and services to you or you may be ineligible for, or be unable to use, certain products and services we provide. For example, you may refuse consent for us to do a credit check, in that event, we may not be able to extend credit or margin services to you.

Haywood will explain your options for refusing or withdrawing consent to the collection, use or release of your personal information, and we will record and respect your choices. If you wish to discuss your options you may do so by contacting Haywood's designated Privacy Officer as set out below, or by contacting our Compliance Department. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent.

### **How Long Does Haywood Retain Personal Information?**

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. The length of time we retain information varies depending on the product or

service and the nature of the information and may extend beyond the end of your relationship with us, but only for so long as it is legally necessary for us to have sufficient information to respond to any issue that may arise at a later time. When your personal information is no longer needed, we have procedures to destroy, delete, erase, or convert it to an anonymous form. Upon request, we may provide you with additional information regarding the retention period of your personal information.

### **How Does Haywood Protect Personal Information?**

Haywood stores and processes your personal information in Vancouver, British Columbia, Canada. Certain personal information about you is retained by the Haywood office that handles your account.

We maintain security standards and procedures to help prevent unauthorized access to confidential information about you. Our security standards and procedures are updated and tested from time to time to improve the protection of our information about you and to assure the integrity of our personal information.

We have procedures that limit employee access to personally identifiable information to those employees with a business need to know such information about you. We educate our employees about the importance of confidentiality and customer privacy through standard operating procedures, special training programs, and our internal policies. We take appropriate measures to enforce employee privacy responsibilities.

All our suppliers and agents, as part of their contracts with Haywood, are bound to maintain your confidentiality and may not use the information for any unauthorized purpose. When we provide information in response to a legal or regulatory inquiry or order, we ensure that the order is valid, and we disclose only the information that is required – otherwise we will seek your consent prior to disclosing any information.

Haywood Securities Inc. uses third party providers of information technology and data processing services that may store or process your personal information outside of Canada. Your personal information may be disclosed in response to valid demands or requests from government agencies under applicable law in those jurisdictions. If you do not wish your personal information to be stored or processed outside of Canada, please notify your Investment Advisor and request that your account be closed.

For Quebec residents, please note that Haywood may disclose your personal information outside your province. If such is the case, Haywood will conduct a Privacy Impact Assessment prior to its communication. The information may be released only if the PIA establishes that it would receive adequate protection in the service provider's jurisdiction, particularly considering generally recognized principles regarding the protection of personal information. Haywood will enter into a written agreement with the recipient, the provisions of which will consider the results of the PIA as well as the risk mitigation measures.

### **What about the Internet?**

We share your concern about your privacy in the Internet world and are committed to its protection. The principles set out in this privacy policy apply equally to anything you might do at our Web site.

Haywood Securities uses cookies (a simple HTTP text-only string of data) to improve the services provided to you and enhance your web site experience by making it easier and faster for you to access our web site and its services. When you enter our web site, a cookie may be stored on your hard drive which contains a random, unique user identification number that is used to track how you entered the web site and your traffic patterns or “clickstream” on the web site. Haywood Securities only uses essential cookies, which are anonymous and do not reveal your personal identity, nor will they follow you throughout your travels on the web, and nor can they capture private data. These cookies establish a user session and allow our server to correctly provide site users with the appropriate frames and content.

You may be asked to provide certain personal information as part of an application for use of one of our web site services, such as access to our Client Centre or research reports. If, as part of such application, Haywood requests that you transmit confidential information to us over the Internet, we ensure that such transmission is encrypted. When you use one of our Web site services, we may compile a profile for you for that service (e.g., name, address, account numbers, logon id, etc.). Each time you use these services, we collect your logon id, information about the pages of Haywood’s Web site that you visit while using the service. We use your profile in responding to your inquiries on the service. We use your logon id to identify you as a user of the service. We use the transaction information in the aggregate to assess and improve the service. We may also use the profile information you provide so that we can inform you of other Haywood products and services. You can contribute to the confidentiality of your personally identifiable information when using the Haywood Web site by not disclosing your designated username and password to anyone.

When you send us an e-mail or when you ask us to respond to you by e-mail, we learn your exact e-mail address and any information you have included in the e-mail. We use your e-mail address to acknowledge your comments and/or reply to your questions, and we will store your communication and our reply in case we correspond further. We will not sell your e-mail address to anyone outside of Haywood. We may use your email address to send you information about our products or services that we believe may be of interest to you.

If you don’t want us to contact you with product information by e-mail, you may tell us so at any time. Remember, e-mail over the Internet is generally unencrypted. We recommend that you do not send us sensitive or confidential information by ordinary email, as unencrypted email is generally not secure.

Our Web site may contain links to other Web sites. When you click on one of those links, you are contacting another Web site for which Haywood has no responsibility and over which Haywood has no control.

### **How Do I Access My Personal Information?**

You may request access to your personal information on record with Haywood and information about Haywood's use and disclosure of that information by contacting your investment advisor or by contacting the office manager of the Haywood office that handles your account. We will advise you in advance if a minimal charge will be required for conducting the search, and we will respond to your request promptly, but in any case, within 30 days. Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to Haywood, is too costly to retrieve, or cannot be disclosed for other legal reasons. Also, we do not maintain disclosure records for regular or routine actions.

If you have any questions regarding decisions made about you, we will tell you about the reasons for those decisions. Where relevant, we will provide you with the name and address of the credit reporting agency from which a report was obtained.

#### **How Do I Keep My Personal Information Accurate?**

Haywood attempts to keep its records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information. If you find any errors in our information about you, let us know and we will make the corrections immediately and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in our file.

#### **Who Should I Contact Regarding Privacy Issues?**

Haywood's Privacy Officer is Bruce Thompson, Chief Compliance Officer. If have any questions or concerns about your privacy and confidentiality – or any concerns about the way a request for personal information was handled, please contact our Privacy Officer as follows:

- In writing, at Suite 700-200 Burrard Street, Vancouver, British Columbia, V6C 3L6.
- By telephone, at 604-697-7100, or toll free at 1-800-663-9499.
- By e-mail, at [bthompson@haywood.com](mailto:bthompson@haywood.com).