

## **PRIVACY POLICY**

Last updated on November 14, 2017

### **We respect your privacy!**

Artemis Investment Management Limited (the “**Company**”) adheres to the privacy protection provided for in the *Personal Information Protection and Electronic Documents Act (“**PIPEDA**”)* and other similar provincial legislation. These rules govern the collection, use and disclosure of your personal information to help ensure that we obtain the proper consent from you before collecting, using or disclosing your information.

### **Frequently Asked Questions**

- (1) WHO can I contact if I have questions?
- (2) WHAT is PIPEDA and HOW does it apply to me?
- (3) WHAT rights do I have?
- (4) WHAT type personal information is usually collected from me?
- (5) WHEN is my personal information collected from me?
- (6) WHEN can my personal information be disclosed to third parties?
- (7) WHY is my personal information collected?
- (8) HOW LONG is my information being kept?
- (9) HOW is my personal information protected?
- (10) HOW can I request my information be updated or corrected?
- (11) HOW can I register a complaint?

### **We want to hear from you!**

If you have any questions or comments, please contact the Company’s Privacy Officer at:

Email: [privacyofficer@artemisfunds.ca](mailto:privacyofficer@artemisfunds.ca)

Phone: 416-934-7455

Mail: 1325 Lawrence Avenue East, Suite 200, Toronto, ON M3A 1C6, Canada

### **Our 10 Principles**

*Principle 1: Accountability*

Every employee of the Company understands the importance of privacy and the need to adequately secure your personal information. Our Privacy Officer is available to answer any questions or complaints that you might have.

*Principle 2: Identify the purpose*

We will tell you the reasons for collecting your personal information before or at the time the information is collected.

*Principle 3: Obtain your consent*

Your prior knowledge and permission is required for the collection, use, and disclosure of your personal information, except otherwise provided for by legal or security reasons.

*Principle 4: Limiting collection*

The personal information that you provide us with will be limited to the identified purpose.

*Principle 5: Limiting use, disclosure and retention*

Your personal information will not be used, disclosed or retained for a purpose other than that discussed with you when the information was collected, except with your permission, or as permitted or required by law.

*Principle 6: Accuracy*

We will work with you to ensure that the personal information that you provide us is accurate and current.

*Principle 7: Safeguards*

We will protect your information by using safeguards that are proportionate to the sensitivity of your personal information.

*Principle 8: Openness*

Our policies and procedures are available to you upon request to the Privacy Officer.

*Principle 9: Individual access*

Unless limited by law, we agree to provide you with:

- access to your personal information,
- the reason for collecting and/or using your information, and
- any required sharing unless permitted or required by law.

*Principle 10: Handling suggestions and complaints*

If you have any suggestions or complaints, please contact the Company at 416-934-7455 and ask for our Privacy Officer, or email [privacyofficer@artemisfunds.ca](mailto:privacyofficer@artemisfunds.ca).

This policy applies to the Company. We are committed to protecting your privacy and maintaining the confidentiality and security of your personal information. Please read this notice carefully to understand what we do and why.

**(1) WHO CAN I CONTACT IF I HAVE QUESTIONS?**

If you have any questions, comments, or suspect that you've been a victim of a privacy breach, please contact the Company's Privacy Officer at:

Email: [privacyofficer@artemisfunds.ca](mailto:privacyofficer@artemisfunds.ca)

Phone: 416-934-7455

Mail: 1325 Lawrence Avenue East, Suite 200, Toronto, ON, M3A 1C6, Canada

**(2) WHAT IS PIPEDA AND HOW DOES IT APPLY TO ME?**

The *Personal Information Protection and Electronic Documents Act ("PIPEDA")* is federal legislation that sets out the ground rules for how organizations may collect, use or disclose information about you in the daily course of business. It gives you the right to see and ask for corrections to information an organization may have collected about you. It also sets out the right to complain if you think an organization covered by the Act is not living up to its responsibilities under the law.

**(3) WHAT RIGHTS DO I HAVE?**

You have the right to ask whether we hold any personal information about you and to see that information, as provided by law.

You have the right to know:

- how we collect your personal information,
- how we are using it, and
- to whom it may have been disclosed.

**(4) WHAT TYPE OF PERSONAL INFORMATION IS USUALLY COLLECTED FROM ME?**

For the purposes of our policy and the *Personal Information Protection and Electronic Documents Act ("PIPEDA")*, "personal information" means "information about an identifiable individual."

The Company will only collect the information that we need for the purpose that you have consented to. The types of information that we collect and share depend on the product or service that you have with us, but may include:

- Name, address and social security number;
- Assets, income, risk tolerance and investment experience;
- Account numbers, balances and transactions

"Personal information" does not include the name, job title, business address or office telephone number of an employee of an organization.

**(5) WHEN IS MY PERSONAL INFORMATION COLLECTED FROM ME?**

We will collect your personal information after you have consented to provide it to us. Consent may express or implied, and therefore may be obtained in several ways including verbally or in writing.

**(6) WHEN CAN MY PERSONAL INFORMATION BE DISCLOSED TO THIRD PARTIES?**

We may only share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you. This may include: third parties that provide services to us or on our behalf, third parties that assist us in providing services to you, and third parties whose services are used to conduct our business. In any of the aforementioned circumstances, only the necessary information will be provided.

<b>(7) WHY IS MY PERSONAL INFORMATION COLLECTED?</b>
Generally, we need your personal information to: <ul style="list-style-type: none"> <li>• understand your needs,</li> <li>• determine your eligibility for products,</li> <li>• offer you products and services, and</li> <li>• meet regulatory and contractual requirements.</li> </ul>
<b>(8) HOW LONG IS MY PERSONAL INFORMATION KEPT?</b>
We will keep your personal information for as long as it is necessary, including updating the product or service or as required by law. When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to the information during the process.
<b>(9) HOW IS MY PERSONAL INFORMATION PROTECTED?</b>
Access to your personal information is restricted to those that require it. We have implemented a number of physical, technological and organizational control measures to help protect your personal information from unauthorized access. To learn more, please contact the Company's Privacy Officer at: 416-934-7455
<b>(10) HOW CAN I REQUEST MY INFORMATION TO BE UPDATED OR CORRECTED?</b>
If you believe any of the information we have collected about you is incorrect or incomplete, you have the right to ask us to change it.  If you show that your personal information is inaccurate or incomplete, we will make the necessary changes.  If you feel we have not dealt with your request to your satisfaction, you can follow our complaint resolution procedures below.
<b>(11) HOW CAN I REGISTER A COMPLAINT?</b>
You may register a privacy related complaint by contacting the Privacy Officer. We will explain the Company's complaint procedure to you and investigate all complaints. If a complaint is justified, we will take all appropriate steps to set the situation right, including changing our policies and practices if necessary. We will also let you know what other complaint procedures may be available to you.  Email: <a href="mailto:privacyofficer@artemisfunds.ca">privacyofficer@artemisfunds.ca</a> Phone: 416-934-7455 Mail: 1325 Lawrence Avenue East, Suite 200, Toronto, ON, M3A 1C6, Canada

#### Additional Comments

#### OUR RELATIONSHIP WITH GOVERNMENTAL DEPARTMENTS

The Company will contact you and the Office of the Privacy Commissioner of Canada as soon as we can should a privacy breach result in a "real risk of significant harm" to you. We will also work with other governmental departments to help ensure that appropriate security measures are taken to limit similar incidents.