



**MORGAN MEIGHEN
& ASSOCIATES**

MORGAN MEIGHEN & ASSOCIATES PRIVACY POLICY

Morgan Meighen & Associates Limited (“MMA”) respects the privacy of its clients and is committed to keeping Personal Information accurate, confidential and secure, at a minimum in accordance with governing legislation. The MMA Privacy Policy (the “Policy”) is a formal statement of principles concerning the protection of Personal Information collected, used and disclosed by MMA.

“Personal Information” is defined within the Federal Government’s *Personal Information Protection and Electronic Documents Act* (“PIPEDA”), but in summary, Personal Information encompasses any personally identifiable information about an individual. For example, name, date of birth, address, gender, personal financial records, identification number, including social insurance number, would all be considered Personal Information.

This Policy describes the principles MMA follows with respect to Personal Information we collect, use and disclose it in the course of managing your account.

Ten Principles of Privacy

Accountability

MMA is responsible for Personal Information in its possession, custody or control. No confidential or non-public information will be disclosed to any external parties without your consent, unless such information is required by legal process, statutory authority or in the normal course of providing MMA services and products.

A Privacy Officer has been designated to ensure MMA’s compliance with the principles described in this Policy.

Identifying Purposes

The purpose for which MMA collects Personal Information shall be identified before or at the time you provide such information. Some of the purposes for which MMA collects, uses or discloses Personal Information are:

- To establish your identity;
- To understand and assess your eligibility for MMA products and services;
- To understand your needs, in order to ensure MMA may offer appropriate products and services to meet those needs;
- To properly administer the products and services MMA provides, including establishing and maintaining communications with you.
- To provide you with account information, such as holdings and transaction records.

- To protect both you and MMA against errors and to prevent or detect fraud or other criminal activity; and,
- To meet legal and regulatory requirements.

Consent

Your acknowledgement and consent are required for the collection, use and disclosure of your Personal Information, except where required or permitted by law. Consent can be expressed or implied and may be given through an authorized representative. Consent can be withdrawn at any time upon written request to the MMA Privacy Officer, subject to legal or contractual restrictions and reasonable notice.

Limiting Collection

The Personal Information collected will be obtained by fair and lawful means and will be limited to Personal Information necessary to your business dealings with MMA.

Limiting Use, Disclosure, and Retention

Your Personal Information may only be used or disclosed for the purpose for which it was collected, unless you have otherwise consented, or when it is required or permitted by law. Your Personal Information may only be retained so long as it is needed for the identified purposes or as required by law.

There are certain situations where MMA will disclose your Personal Information to third parties in order to provide effective and efficient services. For example, Personal Information may be disclosed to:

- **Service Providers:** members of the financial services industry and related service providers, such as data processors and record keepers that have access to certain Personal Information for the purposes of fulfilling your transactions.
- **Intermediaries:** such as trustees and custodians; and
- **Regulatory Organizations:** such as applicable Canadian provincial securities regulators.

By opening or maintaining an account with MMA or using MMA's services, you have consented to the disclosure of your Personal Information to a third party in the circumstances or for the purposes described above.

Accuracy

MMA collects your Personal Information in a fair and lawful way and will keep such information in an accurate, complete and up-to-date form as long as it is being used for the purposes set out in this Policy, and provided you keep MMA up to date. Prompt notification of any changes, such as to your address, email or telephone number, will help MMA provide you with the best possible service. Should you discover, upon review of your Personal Information, that amendments are required, please immediately advise MMA.

Safeguards

MMA has taken appropriate measures and put controls in place to protect your confidential data. These measures include restricting physical access to MMA offices, the use of passwords and encryption for on-line activities, and shredding paper documents containing Personal Information prior to discarding. Access to your Personal Information is limited to those employees with legitimate business reason to access the information.

With respect to MMA's Client Portal, it can only be accessed using a unique username and password. You are solely responsible for maintaining the confidentiality of your username and password and for ensuring that others do not have unauthorized access to them. MMA is not responsible for any wrongdoing or liability that results from the use of your username and password, or for any unauthorized access to the client-login area of this website. To ensure your security, MMA will never contact you to confirm your password. Please contact a member of your portfolio management team or privatewealth@mmainvestments.com if you become aware that your username and password have been compromised.

Openness

MMA will make available to you information regarding our policies and practices regarding the management of Personal Information.

You may obtain a copy of the current version of this Policy at any time by visiting MMA's website at www.mmainvestments.com or by contacting MMA's Privacy Officer.

Client Access

Upon written request, you have the right to be informed of the existence, use and disclosure of your Personal Information and will be given access to that information, except where restricted by law. You may verify the accuracy and completeness of your Personal Information, and may request that it be amended, as appropriate.

Inquiries and Challenges

You may address a challenge concerning MMA's compliance with the Privacy Principles outlined above or about MMA's practices by contacting MMA as follows:

**Privacy Officer,
Morgan Meighen & Associates Limited
10 Toronto Street, Toronto, On M5C 2B7**

Telephone:	416-366-2931
Toll Free:	1-888-443-6097
Fax:	416-366-2729
Email:	PO@mmainvestments.com
Website:	www.mmainvestments.com

If this fails to satisfactorily resolve your concerns, you may contact the Office of the Privacy Commissioner of Canada by accessing their website at priv.gc.ca, by calling 1-800-282-1376 (toll free), or by writing to:

**Office of The Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec, K1A 1H3**