

Privacy Policy

Protecting Your Privacy

At Manitou Investment Management protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business. We recognize that we must be transparent and accountable in how we treat the information you share with us.

How Do We Define Personal Information?

Personal information refers to information that specifically distinguishes you as an individual and is provided to or collected by us. It includes, for example, your name and address, age and gender, social insurance number, banking information, as well as your investment and financial information.

How and Why We Ask for Your Personal Information?

We obtain most of our information about you directly from you. This information is gathered, primarily through our detailed Client Profile form, which we use in managing your account(s). This information is necessary for a number of reasons, including:

- To fully understand your investment needs and objectives in order to manage your investment portfolio
- To verify your identity and protect you against fraud
- To establish custody accounts that you have requested for the safekeeping of the securities that we manage
- To comply with the regulatory obligations of the securities industry
- To comply with the Canada Customs and Revenue Agency's income reporting requirements.

We limit the information we collect to what we need for these purposes, and we use it only for these purposes.

In order to provide our products and services to you we may provide your information to other persons:

- Where we have your consent
- Where the other parties are our agents or suppliers who assist us in serving you
- Where we are required or permitted to do so by law

The following disclosure is required by the Ontario Securities Commission. It is one example of how we may use your personal information.

Specifically, we are required to advise you that we will be disclosing your name, address and details of your pooled fund purchases to the applicable provincial

securities commissions. This information is collected by the various securities commissions under the authority granted to them in securities legislation for the purposes of the administration and enforcement of the securities legislation. If you have any questions about the collection of this information you may contact the Administrative Assistant to the Director of Corporate Finance at the Ontario Securities Commission at 416-593-8086.

How We Protect Your Information

We protect your information with appropriate safeguards and security measures. We have security standards to protect our systems and your information against unauthorized access and use.

All of our employees, agents and suppliers, as part of their agreements with Manitou Investment Management, are bound to maintain your confidentiality and may not use the information for any unauthorized purpose.

We monitor and review our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

We make every reasonable effort to keep your information accurate and up-to-date. We retain your information for only as long as we require it for the reasons it was collected. When it is no longer required we will destroy or delete it in an appropriate manner.

Questions or Concerns

If you have any questions or concerns about the privacy and confidentiality of your personal information, or if you would like access to the personal information that we have on file for you, please contact Deborah O'Reilly, Privacy Officer of Manitou Investment Management Ltd. at 416-628-6523.