



## **Privacy Policy**

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### **Confidentiality of client information**

Regulus Capital Management Inc. (**Regulus**) earns your trust by adhering to privacy principles in protecting your personal information. The term “personal information” refers to information that specifically identifies you as an individual and is provided to or collected by us. It includes, for example, your name and address, age and gender, personal information records, identification numbers such as your social insurance number, and your employment information.

### **Collection and use of personal information**

Regulus is required under securities legislation and anti-money laundering legislation to collect information to verify the identity and reputation of clients. Regulus is also required under securities legislation to make a determination to ensure a proposed investment is suitable for you. To assess the suitability of proposed investments, Regulus will obtain information relating to your investment objectives, risk tolerance, investment knowledge, financial situation and circumstances. In providing services to clients, Regulus may be required to use and share personal information with its employees, third party service providers and other financial institutions. When you open an account with us, you authorize us to collect this information during the course of our relationship. Personal information collected by Regulus will be held at the head office of the Firm located at 5160 Yonge St, Suite 1870, Toronto, Ontario.

### **Sharing personal information**

Regulus will not use or disclose personal information for purposes other than those for which it was collected except with the consent of the client or as required by law. Personal information will be retained only as long as necessary for these purposes or required by law.

### **Safeguarding personal information**

Client personal information is protected by security safeguards that are appropriate to the sensitivity level of the information. All employees of Regulus are responsible for protecting client privacy, confidentiality and security. This obligation remains in effect even after an employee leaves the Firm. Regulus has appropriate controls in place over computer systems in compliance with its Privacy Policy.

Regulus will ensure that third party service providers requiring the use of personal information have appropriate security procedures and controls to protect the personal information of Regulus’s clients.

### **Updating and accessing your personal information**

With some limited exceptions, you have rights to access and update personal information held by Regulus about you. You may inquire about any personal information Regulus may have about you, by sending an email to [info@reguluscap.com](mailto:info@reguluscap.com). You must include your full name, address and telephone number and a copy of an identity document (such as an ID card or passport). This allows Regulus to verify your identity and whether the Firm has any personal information regarding you. Regulus will contact you if the Firm needs additional information to make that determination.

You may request for Regulus to correct, cancel, and stop processing personal information that Regulus holds about you. If Regulus agrees the personal information is incorrect, or the processing should be stopped, Regulus will correct the personal information or stop the processing. If Regulus does not agree the personal information is incorrect; Regulus will inform you it does not agree. The Firm will record that you consider personal information to be incorrect in the relevant file.