



## **Confidentiality & Privacy Policy:**

### **Confidentiality Policy**

All personal/client information that is obtained either verbally or in writing shall be held in strict confidence at all times. Personal information includes trading history, financial matters and basic information such as client name, residential address, telephone number, email address and age (for a full list of information collected please refer to Gryphon International Investment Corporation's Privacy Policy below).

No personal information shall be disclosed to a third party without the client's prior written consent, with the exception of affiliates of Gryphon International Investment Corporation (GIIC) and certain agents of GIIC, who require access to this information to perform their duties and assigned functions. Written consent from clients authorizing the release of such information shall be kept in the client's file.

Notwithstanding the above exception, personal information will also be disclosed pursuant to statutory authority and/or as required by legal process. Any requests received by GIIC in connection with such required disclosure must be immediately presented to the Chief Compliance Officer (CCO); The CCO is the sole individual responsible for releasing the requested information. Furthermore, the CCO will independently determine whether clients are to be informed of such requests for personal information and what information is subsequently provided pursuant to such requests.

Where authorized disclosure of personal information is made, the following process must be adhered to:

- Disclosure shall be limited to only that personal information which of necessity must be provided;
- The information disclosed shall be accurate and relevant;
- The information disclosed shall be limited to that for which the specific written authorization was provided.

Where authorized disclosure of personal information is made, a record shall be placed in the client's file outlining the nature of, extent and parties to whom the disclosure was made.

All client personal information, whether stored electronically or otherwise, shall be maintained in a strictly controlled environment. Access to such information shall be limited to only those staff whose access is necessary to perform their duties for GIIC.

GIIC is responsible for personal information in its possession, custody or control, including information that has been transferred to a third party for processing. Prior to disclosing any personal information to any third party, GIIC shall use contractual or other means to provide a comparable level of protection while the information is in the possession, custody or control of a third party.

Any complaints received from a client in connection with an alleged misuse of personal information shall be immediately forwarded to the CCO. The procedure for complaint resolution is detailed in a separate Complaint Policy, which is available upon request.

Please note that a client may withdraw consent with respect to disclosure of personal information at any time, subject to legal or contractual restrictions and reasonable notice. Absent such withdrawal of consent, any authorized consent is valid for the period of time needed to achieve the identified purposes.

## **Privacy Policy**

At GIIC our relationship with our clients is our most important asset. We understand that we are trusted with private financial information, and accordingly, do everything we can to maintain that trust. The following describes our privacy policy:

**We do not sell client information to anyone.**

**We do not disclose client information to unaffiliated third parties unless one of the following limited exceptions applies:**

- We receive prior written consent;
- Through written consent we disclose client information to the client, and persons authorized by the client such as attorneys, accountants and consultants. We disclose client information to brokers, custodians and other service providers with whom we must share information in order to manage or service each client account;
- We may disclose client information in limited circumstances where we are permitted or required by law to release the information to the recipient.

**We collect personal information from the following sources in the normal course of business to serve you better:**

- Account applications and other forms, which may include client name and address, telephone number, social insurance number (social security number for U.S. clients), tax information and information about risk tolerance, and investment goals and horizons.
- Information from professional advisors such as attorneys, accountants and consultants, who may provide financial, investment history and tax information about you;
- Account history, including information about the transactions we have ordered for you and balances in your account;
- Correspondence, written, electronic or telephonic between you and GIIC or your broker or custodian and GIIC.

**The personal information we routinely collect includes:**

- Social Insurance Number/Social Security Number;
- Tax identification number, or other tax information;
- Beneficiary information, as required for retirement accounts and other legislative, regulatory or tax purposes;
- Date of birth, and date of formation for business entities;
- Investor information (including investment knowledge, investment objectives, time horizon, and net worth and income) - to determine suitability of investment selection, and to address legislative and regulatory obligations;
- Residential or Head Office address, telephone number, email address, fax number and other contact information - for purposes of mailing notices, financial statements, tax slips and to provide other pertinent information.

We protect the confidentiality and security of your personal information. We restrict access to client's personal information as much as possible, to those employees who need to know in order to provide our services.

At GIIC, the privacy of client information is a primary concern. We have established various safeguards to ensure privacy and review our policy and safeguards on an ongoing basis and implement new procedures and amend our policies where necessary. Current measures to protect privacy extend to three different areas of service and some of our safeguards are as follows:

- **Our staff** - All staff members must sign an agreement which incorporates a confidentiality clause. Personal information is provided to accredited professionals on a need-to-know basis;
- **Paper files** - Client personal information is stored in a secure environment. Older information may be stored off-site and is also maintained in a secure environment provided by a third party specializing in secure storage;
- **Electronic files** - As with many industries and businesses, technology has significantly impacted the way in which we conduct our business. GIIC makes use of various safeguards such as secure firewalls for all internet connections, frequently changed passwords, encryption of back-up files that are stored offsite with a third party service provider. Any information stored offsite with third party providers is also covered by separate confidentiality agreements.

#### **Can clients access information stored with or by GIIC?**

All clients have access to their records and can request this information by sending a written request for information to:

Chief Compliance Officer  
Gryphon International Investment Corporation  
20 Bay Street, Suite 1905  
Toronto, ON M5J 2N8  
Canada

#### **GIIC adheres to its Confidentiality and Privacy Policy for both current and former clients.**

GIIC's Chief Compliance Officer (CCO) is charged with the responsibility for ensuring compliance with the policies and procedures that have been established for GIIC, including those outlined in this document.

If you have any questions or concerns regarding our policies and procedures, please contact our CCO at 416.364.2299.

This policy is effective January 1, 2004. GIIC reserves the right to amend this policy at any time.