

Stephen Avenue Securities Inc. (“SAS”)

Privacy Policy

Collection and Use of Personal Information by Stephen Avenue

When you open an account with Stephen Avenue Securities Inc. (“SAS”) we will obtain personal information about you which will be kept on file in accordance with industry regulations. Only authorized individuals and entities have access to this information. The information that we collect allows us to identify you, to protect you against possible fraud, to access your potential investment needs so that we may suggest products and services to you which are appropriate for you and to comply with legal and regulatory requirements.

Social Insurance Number/Business Number/Tax Identification Number

SAS may collect, use and disclose your Social Insurance Number, Business Number or Tax Identification Number for tax reporting purposes.

Disclosure of Personal Information to External Sources

SAS may, from time to time, disclose your personal information to external sources such as National Bank Independent Network (“NBIN”, a division of National Bank Financial Inc.), credit agencies, proxy processing agents, transfer agents, clearing agencies, issuers per your instructions under NI 54-101 (below), other financial institutions and other parties who provide services to SAS. SAS may also rely on external sources to collect personal information about you.

Affiliated Companies

SAS does not disclose your personal information to affiliated companies for non-essential services. Employees of related companies (e.g. NBIN) may have access to your personal information in that they provide certain services such as trade execution and carrying broker functions for SAS accounts.

Consent

Your consent is required before we may provide your information to any third parties other than those listed above. The consent that you provide to SAS with regards to the collection, use and disclosure of your personal information may be cancelled by you at any time by providing written notice to our Chief Compliance Officer. SAS does not require your consent to the collection, use and disclosure of your personal information where such collection, use and disclosure is reasonably required in the normal course of providing service to your account or for the collection of a debt owed to SAS by you, or to a law enforcement agency, securities regulatory authority or Self-Regulatory Organization or to legal counsel for the purpose of obtaining advice or to Revenue Canada. By opening an account at SAS, you are providing consent to SAS to collect, use and disclose your personal information as set out herein.

Corrections to Personal Information

You may review the information you have provided to SAS and make corrections to it. We may request that you provide corrections in writing. You may address corrections, questions or privacy related complaints to the Chief Compliance Officer, Stephen Avenue Securities Inc. 402-217 Queen Street W., Toronto, M5V