

North Growth Management Ltd. (“NGM”)

Privacy Policy : Clients

The *Personal Information Protection Act* (“the Act”) regulates the way private sector organizations within British Columbia collect, use, keep, secure and disclose personal information. “Personal Information” means all information about an identifiable individual, but does not include the name, title, business address or business telephone number of an individual.

We recognize our professional obligation to maintain the confidentiality of our clients’ information, and recognize our obligations concerning the personal information of all individuals that we collect, use or disclose.

Our Need for Personal Information

In order to be able to provide financial services to our clients, we have an obligation to collect information that will enable us to “know our clients”. This information will necessarily include personal information.

Collection Use and Disclosure of Personal Information

NGM only collects as much personal information about our clients as is necessary and required to provide them with appropriate financial advice with respect to our Funds, and to comply with the law.

If you open a registered account (RSP/RIF) with us, your personal information may be shared with the trustee of the registered account for the purpose of administering the account only.

Otherwise, NGM does not sell, lend or disclose clients’ personal information to third parties unless required to do so by law (i.e. SIN must be disclosed to CCRA in preparation of T3s, purchases made pursuant to prospectus and registration exemptions of Securities Acts in Canada must be reported to the appropriate Securities Commission) or requested in writing by the client (i.e. providing information to a client’s accountant).

Where practical, we endeavour to collect personal information directly from the person to whom the information pertains. When necessary, we will collect personal information from other sources.

The *Act* deems that an individual has consented to our collection, use or disclosure of personal information about that individual if, at the time the consent is deemed to be given, the purpose would be considered obvious to a reasonable person. In such

circumstances, we will collect, use or disclose personal information without obtaining a written or verbal consent to do so.

The *Act* also permits us to collect, use or disclose personal information about an individual in some circumstances without the individual's consent. Those include (but are not limited to) circumstances in which:

- the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- it is reasonable to expect that the collection or use of personal information with the consent of the individual would compromise the availability or accuracy of the information, and the collection or use of the information is necessary for an investigation or proceeding;
- it is reasonable to expect that the disclosure of personal information with the consent of the individual would compromise an investigation or proceeding, and the disclosure of the information is necessary for an investigation or proceeding;
- the personal information is available to the public from a prescribed source;
- the collection, use or disclosure of personal information is required or authorized by law.

When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate and complete.

Retention of Personal Information

NGM retains personal information for as long as may be necessary to respond to Fund related issues that may arise at a later date, and longer if required by law.

When personal information is no longer required by NGM it is destroyed.

Safeguarding Your Personal Information

We recognize our professional and legal obligations to protect the confidential information of our clients.

We have made arrangements to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information.

Internet e-mail is generally not secure and cannot be considered confidential. Please do not send us confidential or sensitive personal information via ordinary e-mail as we cannot assure you the privacy of that information.

Requests for Access to Personal Information

The *Act* permits individuals to submit written requests to us to provide them with:

- their personal information under our custody or control;
- information about how their personal information under our control has been and is being used by us;
- the names of the individuals and organizations to whom their personal information under our control has been disclosed by us.

Normally we will respond to access requests within 30 days. All requests may be subject to any fees and disbursements the law permits us to charge.

Requests for Correction of Personal Information

The law permits individuals to submit written requests to us to correct errors or omissions in their personal information that is in our custody or control. We will:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the personal information, but annotate the personal information that a correction was requested but not made.

Updating Your Personal Information

Please help us maintain the accuracy of your personal information by notifying us of any change to your personal information that would be relevant to your dealings with NGM.

Contacting or Communicating with Us

If you have any questions with respect to our policies concerning the handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact our Privacy Officer:

Privacy Officer
North Growth Management Ltd.
Suite 830, One Bentall Centre
505 Burrard Street, Box 56
Vancouver, BC V7X 1M4

Telephone: (604) 688-5440
E-mail: caroline@northgrowth.com

If you are dissatisfied with our handling of your personal information, we invite you to contact our Privacy Officer in writing, setting out the reasons for your concern. If, after our Privacy Officer has reviewed and responded to your concern, you remain dissatisfied, you may wish to contact the Office of the Information and Privacy Commissioner:

P.O. Box 9038, Stn Prov Govt
Victoria, BC V8W 9A4
Telephone (250) 387-5629
Fax (250) 387-1696

Privacy Policy Updates

Periodically NGM will review its Privacy Policy. Changes will be posted on this page.