

# NTC Canada Privacy Notice - YOUR PRIVACY MATTERS

At The Northern Trust Company, Canada, The Northern Trust Company, Canada Branch and NT Global Advisors, Inc. (collectively “NTC Canada”), we are dedicated to protecting your privacy and safeguarding your confidential personal and financial information. In fact, it is one of our highest priorities and remains one of the cornerstones of our commitment to you. When you, or our client that has been entrusted with your Personal Information, chooses to provide personal information to us, we use vigorous security safeguards and adhere to Ten Privacy Principles to ensure your personal and financial information is protected. These principles are based on the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) and guidance from the Office of the Privacy Commissioner of Canada and are paramount to NTC Canada executing sound business judgment.

The term “Personal Information”, as defined in PIPEDA, means information about an identifiable individual. It may include unique details about you such as your name and address, age and gender, personal credit records, social insurance number and personal identification numbers including those contained in your driver’s license, passport and/or other government issued identification.

## ***Principle 1 – Accountability***

NTC Canada is responsible for maintaining and protecting all client information under its control. In fulfilling this mandate, NTC Canada is required to designate an individual who is accountable for NTC Canada's compliance with the Ten Privacy Principles.

All employees, officers, directors and independent contractors of NTC Canada are aware of, and accountable for, our responsibility to maintain the security and confidentiality of the Personal Information we collect from our clients. The Chief Risk and Compliance Officer, has been designated as the Privacy Officer who oversees privacy governance, including privacy policy, complaints, employee training, recordkeeping and reporting privacy matters to NTC Canada Senior Management, the applicable Boards of Directors and, when required, regulatory authorities with appropriate jurisdiction.

## ***Principle 2 - Identifying Purposes***

The purpose for which Personal Information is collected from clients will be identified before or at the time the Personal Information is collected. NTC Canada may, without limitation, collect Personal Information for the following purposes:

- Managing and/or administrating your holdings in any relevant investment fund or similar vehicle and/or managing or administering any account you may hold with NTC Canada on an on-going basis;
- NTC Canada will itself (or through a third party e.g. credit reference agency) process certain information about you or your directors, officers and employees and your beneficial owners (if applicable) in order to carry out anti-money laundering and anti-terrorist financing (AML) checks and related actions which NTC Canada considers appropriate to meet any legal obligations imposed on NTC Canada or in support of NTC Canada’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and

- other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with NTC Canada's AML procedures;
- to report tax related information to tax authorities in order to comply with a legal obligation;
  - to monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution, and to enforce or defend NTC Canada and its affiliates' rights, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with a legal obligation imposed on NTC Canada or to pursue NTC Canada's legitimate interests in relation to such matters;
  - to monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of NTC Canada to improve its service delivery;
  - to update and maintain records and for fee billing;
  - to carry out statistical analysis and market research;
  - to provide you, subject to opt out rights, with information about products and services which may be of interest to you or to the institution you represent;
  - to process or disclose such information as is necessary to perform obligations under a relevant contract with you, and comply with legal obligations and/or which is necessary for NTC Canada's legitimate interests indicated above; and
  - to retain AML and other records of individuals to assist with subsequent screening of them, including in relation to investment in other investment funds or similar vehicles, or the provision of other services by NTC Canada, to pursue NTC Canada's and (in some circumstances) its clients' legitimate interests.

### ***Principle 3 – Consent***

Your knowledge and consent is required for the collection, use or disclosure of Personal Information except where required or permitted by law. Where you are a NTC Canada client and you are providing to us Personal Information of another person (such as an account or plan beneficiary), you are responsible for obtaining the applicable person's consent to provide us with such Personal Information.

Please note that you cannot withdraw your consent to the collection, use and disclosure of Personal Information if we are legally required to collect, use or disclose such Personal Information. Withdrawing consent in certain situations may also mean that we may not be able to fully provide the products or services our client has requested.

### ***Principle 4 - Limiting Collection***

Personal Information collected must be limited to those details necessary for the purposes identified by NTC Canada. Personal Information must be collected by fair and lawful means.

For example, we may collect:

- **Contact Information** including address, telephone number and email address.
- **Social Insurance Number (SIN)** as required in order to comply with the Canada Revenue Agency's reporting requirements. You may provide a SIN to ensure an accurate match between Personal Information and credit bureau information and to help us differentiate customers or beneficiaries who may have the same or similar name.
- **Financial Information** including banking information as required to ensure that the payments we make to you, advice (where applicable) and/or products we provide to you are appropriate for you, and the investments you purchase are suitable (where applicable) for you.

- **Employment Information**, including information about your previous and current employers, to confirm your identity and eligibility for certain products and services.

We may collect Personal Information about you from you and from third parties or sources that are available to the public to satisfy legal requirements or regulatory expectations or to manage our risk and to help us understand our customers in order to develop and tailor our product and service offerings.

You can choose not to provide us with certain information in some situations, but if you make this choice, we may not be able to provide the product, service, or information our client has requested.

#### ***Principle 5 - Limiting Use, Disclosure and Retention***

Personal Information may only be used or disclosed for the purpose for which it was collected unless the client has otherwise consented, or when it is required or permitted by law.

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Notice. Personal Information may be released to third parties including legal or regulatory authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets (for example, collection of overdue accounts).

Unless prohibited by law or under the terms of a specific service agreement, we may share your Personal Information within NTC Canada, including locations outside of Canada where we do business, for legal and regulatory purposes, to manage business risks, to perform analytics, to ensure we have correct or up to date information about you (such as your current address or date of birth) and to better manage an applicable client's relationship with us.

We do not sell the names or other Personal Information provided to us by our client. We do not disclose the names or other Personal Information provided to us by our clients to companies unaffiliated to NTC Canada without consent unless required or permitted by law.

NTC Canada will retain the Personal Information you or our clients have provided to us for as long as is required to perform the agreed upon services, and/or for the purposes for which the Personal Information was collected, depending on the legal basis for which that Personal Information was obtained and/or whether additional legal/regulatory obligations mandate that NTC Canada retains your Personal Information.

#### ***Principle 6 – Accuracy***

Personal Information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used. If you discover inaccuracies in our records or the applicable Personal Information changes, please notify NTC Canada immediately so that we can make the necessary changes. Failure to notify us of changes to Personal Information may negatively impact the way we communicate or provide services to you.

#### ***Principle 7 - Safeguarding Client Information***

Personal Information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

We use physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of Personal Information in our custody or control.

We have agreements and controls in place with approved third party service providers requiring that any Personal Information we provide to them must be appropriately safeguarded at least equivalent to our own standards and used only for the purpose of providing the service we have requested the third party service provider to perform.

***Principle 8 – Openness***

NTC Canada is required to make information available to clients concerning the policies and practices that apply to the management of the Personal Information they have provided to us.

From time to time, we may make changes to this Privacy Notice. This Privacy Notice at (<https://www.northerntrust.com/canada/privacy/north-america>) is always the most recent version.

***Principle 9 - Client Access***

Upon request, you will be informed of the existence, use and disclosure of the Personal Information you or our client has provided to us, and will be given access to it. You may verify the accuracy and completeness of such Personal Information, and may request that it be updated or corrected, if appropriate.

***Principle 10 - Handling Client Complaints and Suggestions***

You may direct any complaints, questions or enquires with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy at NTC Canada.

The Chief Risk and Compliance Officer  
NTC Canada  
145 King Street West  
Suite 1910  
Toronto, ON M5H 1J8 Canada  
Tel: +1800-636-5775 or +1 416-365-7161  
Email: [PrivacyOffice\\_Canada@ntrs.com](mailto:PrivacyOffice_Canada@ntrs.com)