

Last update : November 15th, 2023

Client privacy policy

At Préfontaine Capital Inc ("**Préfontaine**"), we are committed to protecting the privacy and security of your personal information.

Our privacy policy sets out how we collect, use, and disclose your personal information during our business activities, including through our website. It also explains how you can exercise your rights, in particular when you wish to access your information or request that we correct it.

When you provide us with personal information after reviewing this policy, you consent to our use and disclosure of that information in the manner described herein.

IN BRIEF	
<p>What information?</p> <p>Identity, contact and financial information such as the status of your assets with us, your risk profile, and any changes to your information or, in some cases, that of your family members.</p>	<p>How?</p> <p>From you, by telephone, fax, mail, in person or online. We may also collect information from third parties, with your consent.</p>
<p>Why?</p> <p>To verify your identity and manage your file in accordance with the management mandate you have entrusted to us and the applicable legislation.</p>	<p>Where?</p> <p>We are in Quebec, but some of our partners or service providers may have processed your information outside Quebec.</p>
<p>Who else?</p> <p>Our partners and financial service providers, such as our custodians National Bank and Scotiabank.</p> <p>Government agencies to comply with applicable legislation.</p>	<p>Your consent</p> <p>You may withdraw your consent to the use and disclosure of your personal information at any time.</p> <p>However, we may no longer be able to offer you our services.</p>
<p>Your rights</p> <p>You can exercise your rights regarding your personal information by writing to our Privacy Officer, who is also our Chief Compliance Officer.</p>	
<ul style="list-style-type: none"> For more information, write to us at info@prefontaine-capital.com 	

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What is personal information?



Personal information may, alone or in combination with other information, make it possible to identify an individual (not a company).

For example, your social insurance number (SIN), your occupation, your marital status, your address, your telephone number, your email address, your fax number, or any other information that may be used to contact you, as well as financial information about you, your spouse, or a member of your family, is personal information.

This policy does not apply to other websites

This policy does not apply to websites operated by third parties over whom we have no control. If you follow a link to a third-party site, the privacy policy of that third party site applies. We are not responsible for their privacy policies, procedures, or practices. We encourage you to review these policies before submitting any personal information to these third-party sites.

How do we collect your personal information?

We collect your personal information from you by telephone, fax, mail, in person or online:

- when you open an account and make any subsequent changes to your information;
- during our various calls and meetings as part of the customer relationship;
- when you decide to contact us, for example using our online contact information;

With your consent or where permitted by law, we may also collect your information from third parties such as:

- your financial institution;
- your accountants, tax specialists or other professionals.

What information do we collect and why?

We may ask you for information about your family members to help us determine your financial situation. In this case, you are responsible for obtaining their consent.

We collect only the personal information we need to verify your identity and manage your file in accordance with the management mandate you have given us and applicable legislation. For example, we may collect the following information:

Last update : November 15th, 2023

Identity information		
	<p>Which ones?</p> <ul style="list-style-type: none"> ● last name, first name ● SIN ● date of birth ● photocopy of your passport or other identity document ● proof of address 	<p>Why?</p> <ul style="list-style-type: none"> ● verify or confirm your identity ● comply with our obligations ● prevent and combat fraud
Financial information		
	<p>Which ones?</p> <ul style="list-style-type: none"> ● salary ● marital status ● value of your assets and liabilities ● tax statements 	<p>Why?</p> <ul style="list-style-type: none"> ● understand your financial situation ● establish your risk profile ● offer you products tailored to your needs ● manage our client relationship with you ● comply with our obligations
Contact information		
	<p>Which ones?</p> <ul style="list-style-type: none"> ● first and last name ● email address ● telephone number ● postal address 	<p>Why do we do it?</p> <ul style="list-style-type: none"> ● send you our newsletters ● invite you to our events or those of our partners ● keep you informed of the progress of your investments ● send you any other form of communication in connection with our relationship
Cookies		
<p>We only set essential and statistical cookies on our website. We do not use marketing cookies.</p>		

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Generally...	
	<p>Exceptionally, we may need to use your personal information to</p> <ul style="list-style-type: none"> • Meet our legal obligations • Prevent fraud • Respond to requests, warrants, and orders from courts and other regulatory agencies • Protect your and our rights and interests • Cooperate in legal, administrative, or investigative proceedings.
With whom do we share your personal information?	

In the course of our daily business, we may share your personal information with third parties such as service providers or partners. Before sharing your information, we take reasonable steps to ensure that they agree to comply with all applicable laws. In some cases, we will ask you for further consent before sharing your personal information.

Third party category	What they do
Service providers	<p>We use service providers with whom we may share your personal information:</p> <ul style="list-style-type: none"> • National Bank Independent Network and Scotiabank, our custodians, • Ndex Systems, our portfolio management software provider • Microsoft, our server host • Our auditors and accountants • Our lawyers
Partners	<p>We may share information with partners to offer you related services. These partners include:</p> <ul style="list-style-type: none"> • accountants • tax specialists • notaries and lawyers

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Public organizations	<p>Since we operate in a highly regulated industry, we may have to share your personal information with governmental or regulatory bodies such as the Autorité des Marchés Financiers du Québec (AMFQ).</p> <p>We may also have to share your personal information when required by law, regulation, court order, subpoena, valid demand, or search warrant, or in response to a government investigation or other lawful request.</p>
Where do we keep your personal information?	
	<p>Your personal information is hosted in cloud computing (Microsoft Office 365) in Canada. Your personal information may be hosted outside Quebec. If this is the case, different privacy rules may apply. Your information would then be subject to the laws of that jurisdiction and may be disclosed to the government, courts or law enforcement or regulatory agencies of that country.</p> <p>However, our practices regarding your personal information are at all times governed by this Policy and by applicable Canadian and Quebec privacy laws.</p>
How long do we keep your personal information?	
	<p>We will retain your personal information for the duration of our relationship with you. If that relationship ceases, we will destroy your personal information after 7 years, unless we need to keep it longer.</p> <p>We will keep your personal information longer if we are required to do so to comply with our regulatory or other obligations, or to resolve reasonably foreseeable or pending litigation.</p>

Last update : November 15th, 2023

How do we protect your personal information?

	<p>Measures</p> <p>We have put in place physical, administrative, and technical safeguards to protect the confidentiality and security of the personal information we hold about you. We have a plan in place in the event of a security incident. This plan stipulates, among other things, that we will inform the authorities, our information technology experts, and our lawyers, as well as any person concerned, when we are required to do so.</p>
	<p>Restricted access</p> <p>Only authorized personnel who need to consult your personal information in the course of their duties have access to it. In addition, access to customer accounts is subject to double authentication whenever possible.</p>
	<p>Fraud prevention</p> <p>We never send email messages asking you to provide us with personal or otherwise confidential information. If you receive such requests, please do not follow the instructions in these emails, as you may compromise the security of your information by clicking on links to bogus websites.</p>
	<p>Warning</p> <p>However, no security measure is absolute or totally guaranteed. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that information you have provided to us has been compromised), please contact us immediately at</p> <p>:</p> <p>info@prefontainecapital.com</p>

What are your rights regarding your personal information?

To exercise your rights, please write to our Privacy Officer, Stéphane Préfontaine, at info@prefontainecapital.com. We may ask you for proof of identity to ensure that it is really you.

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Access, deletion, and rectification You may access the personal information we hold about you and, where appropriate, ask us to rectify it to the extent permitted by law. You may also request the deletion of obsolete or inappropriate information.	Withdrawal of consent You may withdraw your consent to the use and disclosure of your personal information. However, we may no longer be able to provide you with our services.
To learn more about your rights under Canadian and Quebec law, please consult the following links for Canada and Quebec .	

How to contact us

Our Privacy Officer, who is also our Chief Compliance Officer, will respond to your questions and requests and handle any complaints you may have regarding our personal information practices.

Stéphane Préfontaine

Privacy Officer

Préfontaine Capital inc.

1010 Sherbrooke Street West, Suite 2407

Montreal, Quebec, H3A 2R7

Canada

info@prefontainecapital.com

Will we be updating this policy?

This policy is effective as of the "last updated" date at the top of this page.

We may change this policy from time to time. If we anticipate any material changes, we will notify you by e-mail within 30 days of the change taking effect. These changes will also be posted on our website.