

PRIVACY STATEMENT

Your Privacy

Your privacy is important to Union Securities Ltd., (“Union”). We will respect your privacy through the protection of your Personal Information.

Purpose and Content

Before collecting Personal Information from you, we will explain to you the purpose of collecting it, and we will only collect, use and disclose your Personal Information with your consent, except where otherwise permitted or required by law.

Limiting Collection

Our collection of Personal Information is limited to what is reasonable under the circumstances, and your information will be used only for the purposes for which it is collected.

Security

Your Personal Information is kept confidential and secured and is not disclosed to anyone outside our company without your consent. except where otherwise permitted or required by law.

Access

You have the right to access to your own Personal Information and to correct any inaccuracies.

Our 10 Privacy Principles

As part of our commitment, we have adopted the 10 Principles established by the Canadian Standards Association’s Model Code for the protection of Personal Information. These principles form part of the Personal Information and Electronic Documents Act, (the “Act”), which establishes rules governing the collection, use, and disclosure of Personal Information.

Principle 1 - Accountability

Each Union employee is responsible for maintaining and protecting the customer information under our control.

Principle 2 - Identifying Purposes

The purposes for which customer information is collected shall be identified before or at the time the information is collected.

Principle 3 - Consent

The knowledge and consent of the customer are required for the collection, use, or disclosure of customer information, except where otherwise permitted or required by law.

Principle 4 - Limiting Collection

The customer information collected must be limited to those details necessary for the purposes identified by Union. Information must be collected by fair and lawful means.

Principle 5 - Limiting Use, Disclosure and Retention

Customer information may only be used or disclosed for the purpose for which it was collected unless the customer has otherwise consented, except where otherwise permitted or required by law. Customer information may only be retained for the period of time required to fulfill the purpose for which it was collected.

Principle 6 - Accuracy

Customer 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.

Principle 7 - Safeguarding Customer Information

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

Principle 8 - Openness

Union is required to make information available to customers concerning the policies and practices that apply to the management of their information.

Principle 9 - Customer Access

Upon request, a customer shall be informed of the existence, use, and disclosure of their information, and shall be given access to it. Customers may verify the accuracy and completeness of their information, and may request that it be amended if appropriate.

Principle 10 - Handling Customer Complaints and Suggestions

Customers may direct any questions or enquires with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy.

Personal Information We Collect

Personal information is information that refers to you specifically. With your consent, we may gather personal information from you in person, at a branch, over the telephone, or by corresponding with you via mail or the internet.

The type of information we usually collect and maintain in your customer file may include your:

- Name
- Mailing Address
- E-mail Address
- Telephone Number
- Social Insurance Number
- Date of Birth
- Place of Employment
- Annual Income
- Credit History
- Transaction History

For business customers, information may include the:

- Business Name
- Business Address
- Business Telephone Number
- Name(s) of Owner(s), Officer(s) and Director(s)
- Industry Type
- Financial Status

The choice to provide us with personal and financial information is always yours. In financial dealings, however, your decision to withhold particular details may limit or completely inhibit the services we are able to provide and make it more difficult for us to advise you or suggest appropriate alternatives.

If we are unable to accommodate your request based on the information that has been provided, we may ask for additional details in order to identify other ways to be of assistance. In some instances, Union may also maintain a file containing contact history that is used for customer inquiry purposes.

When Information May be Disclosed to Outside Parties

At Union, we are obliged to keep your personal and financial information confidential except under the following special circumstances:

- When authorized by you
- When required by law (i.e. complying with legal and/or regulatory requirements)
- When permitted by law

When Authorized by You

Credit agencies and other financial institutions may contact us for credit and financial information about clients. To comply with these requests, we require our client's consent.

Client Agreement

A Client Agreement outlines the terms and conditions associated with acquiring specific products or services. In general, it establishes the rights and obligations of both parties as they relate to the provision of that product or service.

With respect to the matter of privacy, the Client Agreement authorizes us:

- To collect credit and related financial information, (including information related to transactions) from you, from credit agencies, other financial institutions, and references provided by you.
- To use personal or business information to determine your financial situation, to provide the services you have requested, and to offer additional products and services that might benefit you.
- To use your Social Insurance Number for tax reporting and for credit agencies matching purposes only.

When Required by Law

The type of information we are legally required to disclose most often relates to government tax reporting requirements as well as regulatory reporting.

In some instances such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities who are making the request have legitimate grounds to do so.

The following are reasons Union may collect, use or disclose information:

- If we use an outside company to process or store information. At times, Union uses the services of an outside company to do work for us involving some of your

information. For example, processing your account information or the mailing of shareholder information.

- Must disclose information for legal or contractual reasons. Union may be compelled to release your information by a court of law, or by another legal authority, regulatory authority, (including self regulatory authority), or governmental body. In all cases, our policy is to release information only to the extent that we are required to do so.
- For regulatory purposes. Canadian self regulatory organizations, (collectively, "SROs") require access to personal information of current and former clients, employees, agents, directors, officers, partners, and others that has been collected or used by persons or firms under their jurisdiction, ("Regulated Persons"). SROs collect, use or disclose such personal information obtained from such Regulated Persons for regulatory purposes, including:
 - a. surveillance of trading-related activity
 - b. sales, financial compliance, trade desk review, and other regulatory audits
 - c. investigation of potential regulatory and statutory violations;
 - d. regulatory databases;
 - e. enforcement or disciplinary proceedings;
 - f. reporting to securities regulators; and
 - g. information-sharing with securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

When Permitted by Law

There are some situations where we are legally permitted to disclose personal information such as returning a cheque due to insufficient funds, employing reasonable and legal methods to collect a delinquent account, a medical emergency, or suspicion of illegal activities.

In certain circumstances, Union may have to collect, use or release information for its protection. For example, Union may do so when collecting an overdue account, when defending a legal action, to detect or prevent fraud, or to detect or prevent any other illegal or improper activity.

Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information. Security safeguards shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The safeguards may include, for example, the physical security of offices and storage facilities or electronic security measures such as passwords, encryption and personal identification numbers.

Accessing your Personal Information

You may access and verify the accuracy of your Personal Information. At the time of your request, we will need specific information from you to verify your identity before we can provide you with the Personal Information we hold.

There may be instances when we will not be able to provide you with the Personal Information that you request. Examples are if the Personal Information:

- Contains references to other persons
- Has already been destroyed due to legal requirements or because we no longer needed it for our purposes
- Cannot be disclosed for legal reasons

Changing Your Personal Information

We are committed to maintaining the accuracy of your Personal Information for as long as it is being used for the purposes we have identified. To help us keep your Personal Information up to date, we encourage you to notify us of inaccuracies or corrections. Notification of changes such as your address or telephone number will help us provide the best possible service.

If you identify any incorrect or outdated information requiring amending please contact us. We may ask you to put your request for a correction in writing. We will make the proper changes and provide you with a copy of the corrected information upon your request.

Contact Us

To request access to your Personal Information or to ask questions about our Privacy Policy or to request that your Personal Information not be used for the purposes outlined above, you may contact us at the address listed below.

Please write to:

*Union Securities Ltd.
#900 - 609 Granville Street
Vancouver, BC
V7Y 1H4*

Attention: Privacy Officer

Or call: 604 646-2097

Or email: privacy@union-securities.com