

Privacy and Protecting Your Personal Information

TWMG Inc. has always been very serious about the confidentiality, integrity and protection of your personal information, in compliance with all applicable legislation. We believe that treating your personal information with the highest degree of respect is integral to our relationship with you.

OVERVIEW

In January 2004, the new federal law on privacy called the "Personal Information Protection and Electronic Documents Act" (PIPEDA) came into effect. In the following document, we explain how the federal privacy policy acts in protecting your personal information and why your private information is collected. Please read the text below which will serve as our notification on the type of personal information we collect and how we use it. The Mutual Fund Dealers Association stated that "For regulatory purposes, self regulatory organizations including Investment Industry Regulatory Organization of Canada, Bourse de Montreal, and the Canadian Investor Protection Fund (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 Regulated Persons. SROs collect, use, or disclose such personal information obtained from Regulated Persons for regulatory purposes."

In September of 2022, the new Quebec provincial law (Loi 25) called "Act Respecting The Protection of Personal Information In The Private Sector" came into effect.

It is our obligation to collect this information and we must decline to accept or administer an account in respect of which an individual does not consent to such intended collection, use or disclose of personal information to SROs and the use and disclosure of that information by SROs. We do not sell, share or provide any of your personal information to any third parties.

WHAT INFORMATION DO WE COLLECT AND WHAT DO WE DO WITH IT?

We collect information to better serve you. The type of information depends on the service we provide. If you are an investor, we collect your name, contact information, Social Insurance Number and other information necessary to provide you with fund management services, to keep records, to prevent error and fraud or to respond to inquiries from your advisor, if you have one. Your personal information may also be used for educational and marketing purposes, including sending material to provide you with product information and better services.

We do not sell any personal information.

We may also share your information with other financial institutions and government organizations and, if you are an investor, your advisor. Where information is shared outside TWMG Inc., it is on a strictly limited basis in order to complete transactions on your behalf, to provide you with services or to meet legal obligations, such as tax reporting. We might be required to disclose personal information in response to a search warrant, court order or other demand or valid inquiry. This may include requests from regulators, including the Mutual Fund Dealers Association of Canada or the Investment Industry Regulatory Organization of Canada, for regulatory purposes. A regulator may, in turn, disclose your personal information to other regulatory or government organizations.

HOW DO WE COLLECT INFORMATION?

Personal information is collected from our interactions with you. We might interact with you directly, such as when you call or write to us or visit www.twmg.net, or we might interact with you indirectly, such as if you are an investor, through your advisor. We may record your telephone or online discussions with our representatives, and we may monitor live or recorded calls or online discussions for our mutual protection, to enhance customer service, for training purposes and to confirm our discussions with you. No matter how we collect your personal information, we try to ensure its accuracy and completeness to the extent required for our use of the information. In order to maintain the accuracy of your information, please make sure we know about any changes as soon as possible.

CONSENT

We must inform you and obtain your consent to collect, use or disclose your personal information. We may accept consent in writing, orally or electronically. You may withdraw all or part of your consent for us to use your personal information within certain legal restrictions. If you withdraw consent, however, we may be limited in the services or products that we provide to you. Please contact us to learn more.

ACCESS TO YOUR PERSONAL INFORMATION

You may request access to your personal information and question its accuracy and completeness. We will respond upon receiving your request. You may request access to your personal information by:

1. Contacting your Financial Advisor
2. Contacting TWMG Inc. Privacy Officer
3. Contacting TWMG Inc. Compliance Department

ACCURACY OF YOUR PERSONAL INFORMATION

Reasonable efforts are made to ensure your personal information is accurate and current and we always rely on your cooperation to inform us when your personal situation has changed.

CORRECTIONS TO YOUR PERSONAL INFORMATION

You may request corrections to your personal information to ensure its accuracy and completeness. You may request corrections to your personal information by:

1. Contacting your Financial Advisor
2. Contacting TWMG Inc. Privacy Officer
3. Contacting TWMG Inc. Compliance Department

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have always considered the protection of sensitive information to be a foundation of customer trust and a sound business practice. We employ extensive physical, electronic and procedural controls, and we regularly review these controls to determine whether they need to be adapted to respond to changing requirements and advances in technology. Within TWMG Inc. and among our service providers, we aim to restrict access to personal information to those who need it to provide products and services to you.

WHAT PROTECTION DO YOU HAVE ONLINE?

We believe that privacy, security and service in our online operations are just as critical as in the rest of our business. We therefore employ all of the safeguards described above, along with the following Internet-specific practices.

We use a variety of protections designed to maintain the security of your online session. For example, we make extensive use of secured internet protocols https, firewall barriers, encryption techniques and authentication procedures.

When you visit our Internet sites, we do not collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited and average time spent on our websites.

Cookies and similar technologies

We do not use cookies and similar technologies to support the operation of TWMG Inc. websites.

WHAT PRIVACY RIGHTS DO YOU HAVE?

You may request access to your personal information and question its accuracy and completeness. We will respond upon receiving your request.

You may withdraw all or part of your consent for us to use your personal information within certain legal restrictions. If you withdraw consent, however, we may be limited in the services or products that we provide to you. Please contact us to learn more.

TRANSPARENCY

Please contact us for any questions or information you require about our policies on Protecting Your Personal Information.

Privacy Officer
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