

**RAYNE CAPITAL MANAGEMENT INC.**

**PRIVACY POLICY  
(As at November 26, 2018)**

Your privacy is a priority and we are committed to protecting your personal information.

In the course of providing you with our services, we are required to collect, use and maintain certain personal information about you. This policy answers some questions about what personal information we collect, the purposes for which we collect it, what we do with it, how you can access it and how we protect it. This policy applies to your account(s) with Rayne Capital Management Inc. ("**Rayne Capital**", "**we**", "**our**" or "**us**"), your investment(s) in investment funds or other products managed or offered by Rayne Capital ("**our funds**"), and your usage of the Rayne Capital website, and is in addition to the client or other agreements governing your account(s) and/or investment(s). By opening an account with us, investing in our funds or using the Rayne Capital website, you are indicating your consent to the collection, use and disclosure of your personal information in the manner described below.

**TYPES OF PERSONAL INFORMATION WE COLLECT**

When opening an account with Rayne Capital or investing in our funds, we collect the following types of information:

- information you provide on your account application or other forms, such as your name, mailing address, telephone number, email address, social insurance number, date of birth, employment information, spousal information, financial and net worth information, and banking information, and information regarding your investment knowledge, objectives and strategies;
- information about your assets, investments, and transactions with us; and
- information we may receive about you from consumer-reporting agencies, including credit bureaus used by us when we engage in debt collection activity.

Our website may also use "cookies", a technology that permits the website to recognize future visits using the same computer. You may choose to decline cookies if your browser permits, but doing so may affect your ability to access or use certain features of our website.

**PURPOSES FOR WHICH WE COLLECT AND USE PERSONAL INFORMATION**

We collect and use the personal information we obtain from you during the account opening and account administration process for the following purposes:

- to open, maintain and administer your account(s) and investment(s) held through your accounts in compliance with applicable law;
- to verify your identity and protect against fraud;
- to provide you with and manage the services you have requested;
- to contact and correspond with you in connection with our services;

- to determine your eligibility for certain of our services or special offers or promotional activities, and to contact you and correspond with you regarding those services, activities or offerings;
- to improve our services to you; and
- to comply with, and monitor compliance with, applicable law including identifying potential securities insider or control relationships, the prevention of possible money laundering, and tax reporting requirements.

For example, we collect your social insurance number in order to meet certain investment income and tax reporting requirements under the *Income Tax Act* (Canada), to keep your information separate from that of other customers with whom you may share a similar name, and to comply with applicable legal and regulatory requirements. We collect your birth date to help us verify your identity and guard against impersonation. We collect only the personal information we need or are required or permitted by law to collect, and use it only for the purposes for which it was collected. We may also collect your information from other persons, only with your express consent, or as authorized by law.

#### **DISCLOSURE OF YOUR PERSONAL INFORMATION**

Rayne Capital does not sell your personal information to third parties. Rayne Capital does not disclose your personal information to third parties other than in the following circumstances or for the following purposes:

1. in connection with normal business operations to open, maintain, administer, or service your account(s) or investment(s), including, without limitation, for the purposes of facilitating the account opening process (including the mailing of account opening materials and the scanning of account documentation, cheques, and related materials into client databases), the provision of client service (including services rendered by third party agents or affiliates), the provision of back office administrative services (including the mailing of transaction confirmations and account statements, and record-keeping services), for audit or statistical purposes, or for the collection of any debt owed by you in respect of your account(s) or investment(s);
2. to entities within the Rayne Capital group of affiliated companies, in order to offer and provide you a wider range of services and better services, to ensure that any updated contact information you provide is processed efficiently, and to engage in surveillance, compliance, and reporting activities required by applicable law;
3. to other suppliers or agents of ours who assist us in providing services to you. In such cases, our privacy policy and principles also apply to any person providing the services on our behalf.;
4. to legal counsel for the purpose of obtaining legal advice;
5. where we are required or permitted to do so by law, including any law enforcement agency, securities regulatory authority or self-regulatory organization;
6. in connection with a transfer of a business in which we are involved; and
7. in connection with offers made to our clients or prospective clients, or other promotional activities or service offerings engaged in by us where (A) third party product or service providers assist us or otherwise participate in fulfillment of the offer or provisions of the service; (B) we have contracted with a third party

for the fulfillment of the offer or provision of the service or otherwise has an ongoing business relationship with such third party; (C) fulfillment of the offer or provision of the service requires disclosure of certain limited personal information for fulfillment purposes only (such as, for example, name, address or email address) to such third party; (D) the disclosed personal information is to be used for fulfillment purposes only and the third party agrees not to disclose the personal information to others; or (E) in an aggregated form (i.e. not individual) for the purpose of analyzing statistics and metrics about our business and operations.

## **CONSENT**

By opening an account with us, investing in our funds or using the Rayne Capital website, you are indicating your consent to the collection, use and disclosure of your personal information in the manner described above.

You understand, acknowledge and agree that your consent to the disclosure of personal information in connection with a matter described above is not a condition of Rayne Capital dealing with you in respect of such matter, including the relevant offer or service to be provided, unless the disclosure of the information is necessary in respect of the particular matter.

**Subject to these qualifications, you may revoke or withdraw your consent to our collection, use or disclosure of your personal information, or withdraw your consent to our further collection, use or disclosure of your personal information at any time on reasonable notice, by contacting us in the manner described below.**

If you wish to revoke or withdraw your consent, we may be unable to provide you with some services, offers or information that may be of value or interest to you. We will be happy to explain any consequences of revoking or withdrawing your consent, and the options available to you.

## **ACCESS TO INFORMATION**

Rayne Capital makes every reasonable effort to ensure that your personal information is accurate and up-to-date. You can also access and update your personal information that we collect about you at any time by contacting us in the manner described below.

In your communication, please include your account number(s), the information previously provided by you, and the new information that you would like to have updated.

## **PROTECTION OF PERSONAL INFORMATION**

Rayne Capital protects your personal information by storing it in locations that are designed to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of that information. Rayne Capital protects your account information by placing it on the secure portion of our website, using firewalls and other security technology to protect our network and systems from external breaches. Our employees (for example, customer service personnel) have access to your personal information only on a need-to-know basis.

**QUESTIONS, INQUIRIES OR COMPLAINTS**

Robert McFarlane, our President, Chief Executive Officer and Ultimate Designated Person, is accountable for this policy. Any questions, inquiries or complaints regarding this policy should be directed to Mr. McFarlane at 403-263-5444 or by writing to us at:

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