

## Guardian Capital Advisors LP Privacy Policy

*In this Privacy Policy, the words "you" and "client" are used to indicate any individual who obtains or has obtained a financial product or service from Guardian Capital Advisors LP. The words "personal information" are used to indicate any nonpublic information that identifies you or your accounts*

### **How We Use and Protect Client Information**

At Guardian Capital Advisors LP, we believe that the trust of our clients is our greatest strength. That is why we are committed to protecting your privacy and the confidentiality of your personal information.

We are providing this Privacy Policy to our clients in an effort to explain our collection, use, retention and security of your personal information.

### **How We Gather Information**

We collect your personal information in the process of establishing and administering your accounts,

*Application Information:* When you open an account with Guardian Capital Advisors LP, you provide information to us in your account documentation. This information may include your name, address, phone number, email address, Social Insurance Number, date of birth, family and marital status and information about your assets, investments, income, investment experience, and investment objectives.

*Transaction Information:* Any time you initiate a transaction in an account with us, we collect information about that transaction. We also keep information about your accounts with us, such as transaction history, current balances and current investments. These records also may include the application information listed above.

We may gather personal information for "Know Your Client" and other purposes on a continuing basis through meetings, discussions, document requests, and at times other than those noted above, in order to ensure we have accurate information to service your account and to meet regulatory obligations

### **How We Use and Share Information**

We share your personal information only with those parties who assist us in establishing and administering your account. Those parties may be located outside Canada, but remain subject to privacy legislation in their local jurisdiction and contractual requirements imposed on them by Guardian Capital Advisors LP. We do not sell your personal information to anyone, and we make every effort to maintain confidentiality.

*Use of information:* We use your personal information to establish and administer your accounts, to alert you to products and services we provide, and to fulfill our regulatory obligations.

*Sharing information for the purpose of providing service:* We disclose your personal information to those parties who assist us in processing your transactions or otherwise providing service to your accounts. In order to improve the services we provide, we also may request your permission to disclose personal information, such as transaction history and investment objectives, to other companies in the Guardian Capital family.

*Sharing information for legal purposes:* In certain circumstances, we may share personal information as required or permitted by law. We may do so, for example, to cooperate with regulators or law enforcement authorities, to resolve consumer disputes or for institutional risk control.

### ***How We Protect Information***

Even when we share your personal information, we remain committed to maintaining your privacy. We take steps to protect confidentiality of personal information whenever possible.

*Contractual protections:* We have contracts with all unaffiliated companies with whom we share personal information, prohibiting them from using such personal information for any purpose other than that for which it is disclosed, and further prohibiting them from disclosing it to any other parties.

*Physical and procedural safeguards:* We maintain physical, electronic and procedural safeguards to protect the confidentiality of your personal information. We also restrict employee access to your personal information to those employees who need to know that information in the course of their job responsibilities. Our employees are generally prohibited from using your personal information for any purpose other than that for which it was disclosed.

### ***Consent***

The purposes for which we collect, use and disclose your personal information is central to our provision of services to you. We believe that we cannot continue to provide you with those services if you object to our collection, use and disclosure of your information for those purposes. We will therefore consider that your ongoing maintenance of an account with us constitutes your consent to our continued collection, use and disclosure of your personal information as described above.

### ***Other Information***

We reserve the right to change this Privacy Policy and any of the policies and procedures listed herein at any time. However, if at any time in the future it becomes necessary to disclose personal information in a way that is inconsistent with this Privacy Policy, we will give you advance notice of the proposed change and an opportunity to opt out of such disclosure. If you end your relationship with Guardian Capital Advisors LP, we will adhere to this Privacy Policy for as long as we retain your personal information.

This Privacy Policy applies to products and services provided by Guardian Capital Advisors LP. Other Guardian Capital companies and any third parties who provide you with financial services may have policies that differ from this one. You should contact those companies directly for more information. The examples and illustrations contained in this Privacy Policy are illustrations and are not intended to be exclusive.

We make every effort to keep your personal information accurate and complete. If you have questions about this Privacy Policy, if you would like access to your personal information or if you believe that we have outdated or otherwise inaccurate personal information about you, please contact our Privacy Officer, by calling Guardian Capital Advisors LP at 1-800-253-9181 or email [privacyofficer@guardiancapital.com](mailto:privacyofficer@guardiancapital.com)

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