

Baskin Privacy Policy Disclosure

Your privacy is protected

At Baskin Financial Services Inc. ("Baskin" "we" "us" "our"), the privacy of your personal information has always been a top priority. We have this Privacy Policy in place to protect your privacy. We provide this Privacy Policy to our clients, potential clients, employees and business partners in order to assure and remind them of how and why we will handle personal information at Baskin: with care and discretion.

In accordance with privacy legislation, Baskin follows ten privacy principles when collecting, using, disclosing and protecting your personal information

1. **Accountability.** We are accountable for personal information under our control. There is a designated individual within Baskin who ensures our compliance with these principles.
2. **Identifying Purposes.** The purpose for collecting your personal information is identified at or before the time it is collected.
3. **Consent.** We obtain your consent before collecting, using or disclosing your personal information, except where legally required or permitted.
4. **Limiting Collection.** We limit the personal information we collect to what is necessary for us to conduct business. We collect information only by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention.** The personal information we collect is only used or disclosed for the purposes for which it was originally collected, unless we have your consent or the information is required by law. We retain your personal information only as long as necessary for those purposes.
6. **Accuracy.** We take care to ensure the information we have is accurate and up-to-date.
7. **Safeguards.** We protect your personal information by maintaining appropriate safeguards.
8. **Openness.** We are open with you about our policies and practices related to managing your personal information.
9. **Individual Access.** Upon request, we provide you with access to your personal information. You can ask how your information is used, ensure your records are accurate and complete, and update information if necessary.
10. **Addressing Your Concerns.** If you have questions or concerns regarding your privacy, we have steps you can follow to make sure your questions are answered to your satisfaction.

Collection, Use and Disclosure of Personal Information

"Personal information" is information about you as an individual. This includes details such as your name, age, residence, birth date, marital status, occupation, identification, citizenship and various other

financial information. In most circumstances, personal information does not include most information that might appear on a business card or information that is available in public records.

Collection, use and disclosure to agreed business partners, and to government authorities as required by law, of personal information is fundamental to the portfolio management services we provide.

Baskin does not sell its client lists or other personal information about clients. We recognize the importance of keeping personal information confidential. We only collect, use and disclose personal information to the extent necessary primarily for the following purposes:

- to provide portfolio management and financial planning services;
- in accordance with a written direction by you (for example, if you wish for your spouse to be able to access your financial information, written instructions to the effect should be provided to us);
- to keep you aware of investment and economic trends and financial products which we think may be of interest to you;
- to provide our newsletter;
- to send you birthday or holiday greetings;
- to apprise you of events hosted or recommended by Baskin;
- to adhere to regulatory requirements we ask for your name, address, birth date, occupation, identification and various other personal and financial information; and
- to adhere to laws or for tax-reporting requirements, we ask for your tax identification number such as your Social Insurance Number (SIN), Social Security Number (SSN), etc.

We obtain most of your personal information directly from you. When we ask for information we will let you know how it will be used. Some information may be obtained from other sources with your consent (if required). When we obtain information from someone other than you, we record the source of that information, unless otherwise permitted or required by law.

There are many ways you can give your consent

Your express consent may be given in writing or verbally or through electronic means. Alternatively, where permitted by law, your consent may be implied through an action you have taken or when you continue to use a service after we have notified you of a change.

Examples of express consent:

Written: If you sign an agreement and the agreement states “I agree to the terms on the reverse”.

Verbal: Responding to a direct question from an employee of Baskin.

Examples of implied consent:

Action you have taken: If you use our services after we have notified you of a change.

There are exceptions where we may collect, use or disclose information without consent.

1. If we use an outside service provider. At times your personal information may be provided to a broker or other outside service provider. If so, our policy is to release information only to the extent that we have to.
2. If we are required by law. We may be compelled to release information by a court of law or other legal or regulatory authority. If so, our policy is to release information only to the extent that we have to.
3. In the event of fraud or criminal activity.
4. In order to protect the interests of Baskin in litigation.

You can withdraw your consent

You may always decline or revoke your consent to our use of your personal information to provide you with our newsletter, to communicate with you about investment economic trends and financial products, and/or to notify you of events hosted or recommended by Baskin. This may be done by communicating those preferences in a meeting with us or by contacting our Chief Privacy Officer at the address set out in the section entitled "Contacting our Chief Privacy Officer".

We protect your information from loss and unauthorized access

We limit access to your personal information and ensure that it is securely stored. Depending on the nature of the information, it may be stored in the offices of Baskin or in secure computer systems.

Access to your personal information is only given to those who require it to provide services.

Employees who have access to your information are made aware of how to keep it confidential. Each employee must sign an agreement stating that maintaining confidentiality is a condition of employment with Baskin.

When you open an account with a custodian in connection with your Baskin account, your privacy rights are addressed by that custodian. Other outside service providers retained by Baskin are required to sign contracts to maintain confidentiality and security of your personal information and not to use it for any unauthorized purpose.

We use a combination of security measures to protect your personal information

In addition to the physical and electronic security devices we use to protect your information, we have security standards to protect our computer systems and your information from unauthorized use or access. This protects your information at all times, when it is stored in data files or handled by our employees. Our systems also protect your information when it is electronically transmitted.

We regularly audit our information security procedures and continually assess that they remain effective and appropriate.

When your information is no longer needed

The length of time we keep your information varies depending on the service we have provided to you and the nature of the personal information.

We have retention standards that meet customer service, legal and regulatory needs as well as our internal record retention policy. Consistent with all laws and our internal record retention policy, we secure or destroy your information. For legal reasons, we may keep information beyond the end of your relationship with us.

We monitor our compliance with the Baskin Privacy Policy

We have procedures in place to assist our employees in the application of the Baskin Privacy Policy. We monitor the practice of these policies and report our findings to our Chief Privacy Officer.

We comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), as well as applicable provincial privacy legislation. Our Chief Privacy Officer is accountable for overseeing compliance.

We work with you to keep your information accurate

We make every effort to ensure the information in our records is correct and up to date. However, we also rely on you to tell us when your personal information changes.

It is important to ensure your personal information at Baskin is accurate and complete.

To update your address and other personal information, please contact your portfolio manager at 416.969.9540, toll-free at 1.877.227.5468 or by email at info@baskinwealth.com.

You have the right to access, verify, rectify and update your personal information.

Your personal information is available to you. A Baskin employee can help you check your information, update it and remove any obsolete information. Depending on the nature of the information you are requesting and complexity of your request, we may ask you to put your request in writing.

You can find out the source of information we have collected

If we have obtained information about you from other people, you can ask us for the source of that information.

You can find out to whom we have given information about you

On request, and where legally permitted, we will provide you with the names of outside companies or organizations to whom we have given your personal information. We will however not advise in respect of ordinary course reports to the Canada Revenue Agency or other legal or regulatory authorities.

We promise to report any privacy breach of your personal information to you

A privacy breach may take place at Baskin, and it may also take place at our third-party service providers. If we detected or became aware of a privacy breach in your accounts, we will notify you as soon as feasible. We may be required to report such a breach to privacy regulators, Office of the Privacy Commissioner of Canada (OPC) and/or to the Commission d'accès à l'information (CAI).

Resolving your concerns is important to us

Baskin is committed to treating you with the greatest respect and consideration and providing the highest level of service. However, from time to time, something may go wrong. Whatever the circumstance, our primary concern is ensuring that your concerns are addressed, and your problem is resolved.

How to resolve concerns and complaints at Baskin

We are committed to upholding the Baskin Privacy Policy. If you have any questions or complaints about our Privacy Policy or about how we are complying with the Privacy Policy, let us know right away.

In most cases, a complaint or concern is resolved simply by talking to us about it. You should be able to get swift results by talking to our employees. You can speak with us at our offices or by calling Baskin at 416.969.9540.

Contacting our Privacy Officer

This Privacy Policy may be amended and updated from time to time. The most up-to-date version of our privacy policy will be available by contacting our Chief Privacy Officer:

Chief Privacy Officer, Rob McDonald

95 St. Clair Avenue West, Suite 900

Toronto, ON M4V 1N6

416.969.9540

rmcdonald@baskinwealth.com

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