

Baskin Privacy Policy

Effective date January 2025

Your privacy is protected

At Baskin Financial Services Inc. (“**Baskin**” “**we**” “**us**” “**our**”), the protection 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, beneficiaries and clients’ representatives or agents 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.

Personal Information

Generally, “personal information” does not include information used to communicate or facilitate communication with an individual about their employment, business, or profession, such as the individual’s name, position name or title, work address, work telephone number, or work email address. In addition, information that is available in public records is not considered to be personal information.

Types of Personal Information we Collect

The collection of personal information is limited to what is reasonably required for business purposes. Depending on your interaction with us, we may collect the following categories of personal information:

- **Identifiers and contact information**, such as your first and last name, email address, home address, phone number, date of birth marital status, occupation, identification, citizenship, tax identification numbers and various other financial information
- **Health information**, such as your medical assessment, physical condition, and other health-related data.
- **Information you provide to us through our social media accounts.** We are present on social media platforms like Facebook, Twitter (X) and LinkedIn. When you interact with our social media accounts, for example, if you “like” our page or make comments, we may collect certain information about you, such as your name and profile picture. The information we collect depends on what these social media platforms share with us based on your selected privacy settings. We suggest you consult the privacy policies of these social media platforms to learn more.
- **Marketing and communications information**, such as your communication preferences and your preferences in receiving marketing or other communications from us and third parties. We may collect information related to online activity on our website, including IP addresses, the date and time of your visit, your time zone, your browser and operating system, the sections you visited on our websites. We may collect this information from website visitors using cookies and similar technologies.

Collection, Use and Disclosure of Personal Information

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
- 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 collect your personal information in a variety of ways, including:

- **Directly from you.** 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.
- **Through technologies we use on our websites.** We collect certain information electronically through your contact with our websites using technologies (either our own or third-party technologies) such as cookies and web beacons (see [Cookies and similar technologies](#) for more details).
- **From third parties.** In some instances, we may collect personal information from other categories of third parties, but only with your consent or as permitted or required by applicable law. Third parties may include the professionals assisting you (lawyers, accountants), background check providers and financial institutions . When we obtain information from someone other than you, we record the source of that information, unless otherwise permitted or required by law.

We may share your personal information as follows:

- **With our service providers.** We may transfer your personal information to other organizations and businesses that provide services to us, such as the custodian of your accounts, consulting firms, communications platforms, cloud computing providers, IT or software solution companies, accounting, financial or tax firms, legal consulting, website hosting, and customer service providers. We require these service providers to protect personal information with appropriate security safeguards and to limit their use of personal information to what is necessary to carry out their mandate.
- **With governmental entities.** We may share personal information with governmental entities to comply with applicable laws, regulations and reporting and financing requirements.
- **To protect the interests of Baskin and third parties.** We may disclose personal information when we believe it is appropriate for the purposes of complying with the law, enforcing our agreements, or protecting the rights, title deeds or safety of Baskin or other parties.

- **Other permitted reasons.** We may share your personal information in other situations, in which case we will inform you of such practices and obtain your prior consent (or as required or permitted by law).

We use cookies and similar technologies

We may collect certain information electronically through your interaction with our websites using technologies (either our own or third-party technologies) such as cookies. Cookies are small text files stored on your computer when you visit a website so that information can be saved between visits, such as your login credentials or language preferences. Thus, cookies allow you to log in quickly when you visit our sites.

Our websites and external web services set cookies to maintain full functionality, improve user-friendliness, or pursue the purpose declared with your consent. Cookie technology also enables us to identify individual visitors using pseudonyms, e.g. an individual or random ID, to offer more individualized services and remember your preferences.

You can remove or deactivate some of these technologies anytime through your browser. However, if you do so, you may not be able to use certain features of our websites.

In addition, we may use a third party to help us gather and analyze information about the areas visited on the website (such as the pages most read, time spent, search terms and other engagement data) in order to better understand who is using the service, how people are using the website, and how to improve the effectiveness of the services, user experience and related content on the website. These third parties may use cookies and other tracking technologies.

For example, we may use Google Analytics, a service from Google, Inc. Google Analytics uses cookies to collect information about your use on websites and mobile applications, including your IP address, browsing history and device information. To learn more about how Google uses this data, you can visit this link: <https://policies.google.com/technologies/partner-sites>. You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout>).

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 your investments, economic trends and financial products, and/or to notify you of events hosted or recommended by Baskin. Such withdrawal of your consent may affect our ability to continue providing you with the products and services you have or would like to receive because the continued use and disclosure of your personal information is necessary to make the product or service available. In some circumstances, legal requirements may prevent you from withdrawing your consent. 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”.

You may also unsubscribe from receiving promotional communications from us by following the “unsubscribe” link in any electronic communication or by contacting us using the information provided in the section entitled “Contacting our Chief Privacy Officer”. Please note that even if you have indicated your choice not to receive commercial electronic communications from us, we may still communicate with you regarding the services or products we provide you under applicable laws. In addition, it may take several days to register a preference change across all our systems.

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.

We maintain policies and practices which ensure the protection of your personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used and the format in which it is stored, we implement a combination of measures to protect your personal information, including:

- Internal policies and procedures that define the roles and responsibilities of our employees throughout the information life cycle and limits their access to such information on a “need-to-know” basis;
- If information is collected or stored in electronic format, technical safeguards such as encryption, firewalls, antivirus software and similar measures;
- A designated Privacy Officer to monitor Baskin’s compliance with applicable data protection laws;
- Employee privacy and data security training;
- Procedures for receiving, investigating and responding to complaints or inquiries regarding Baskin’s information handling practices, including any security incidents involving personal information;
- Framework governing the retention and destruction of personal information;
- Contractual protections and other measures to ensure that service providers with whom we share personal information maintain adequate privacy protections and standards. For example, we generally require our service providers to limit their use and retention of personal information to what is necessary to provide their services and to notify us in case of any actual or suspected security incident. We also try to monitor and audit their compliance with these requirements in various ways (e.g. on-site inspections (if feasible), surveys and interviews, proof of certification).

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.

When there are cross-border transfers of personal information

Some of our external third-party service providers and partners are based outside of your province of residence or Canada, including foreign countries like the United States, and their processing of your personal information will, therefore, result in the transfer of information outside of your province of residence and Canada. We have entered into or will enter into a written contract with any third party, providing the protections required by law to ensure the protection of your personal information in compliance with applicable Canadian privacy laws.

Organizations outside Canada may not be subject to privacy laws that provide you with the same rights and protections as in Canada. As a result, your personal information may be subject to the laws of a foreign jurisdiction, including any law that permits or requires the disclosure of information to law enforcement or national security authorities upon request.

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.

Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time. Any changes we make will become effective when we post a modified version of the policy on our websites. If the changes we make are significant, we will provide a more prominent notice when required by applicable laws. By continuing to use our services or purchase our products after the modified version of the Privacy Policy has been posted or you have been informed of such an update, you are accepting the changes to the Privacy Policy. If you do not agree to the changes in our Privacy Policy, it is your responsibility to stop using our services or purchasing our products. It is your obligation to ensure that you read, understand and

agree to the latest version of the Privacy Policy. The “Effective Date” at the top of the Privacy Policy indicates when it was last updated.

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