

PRIVACY NOTICE



At IA Clarington Investments Inc. ("IA Clarington") we take the issue of privacy seriously. We are committed to providing investors with excellent service while respecting the privacy of personal information. Each IA Clarington employee is responsible for ensuring the confidentiality of all personal information to which they have access.



Personal Information

Personal information is information that identifies an individual. It includes information such as age, marital status, social insurance number, home address and telephone number.

How do we use personal information?

Obtaining personal information allows us to:

- Establish the identity of investors;
- Ensure our records are accurate;
- Establish and administer accounts;
- Execute transactions;
- Maintain account holdings and transaction records;
- Verify information previously given;
- Provide investors and their investment advisors account information and statements;
- Provide investors with financial statements, tax receipts, transaction confirmations, proxy mailing and other information that may be required to service accounts;
- Provide customer service; and
- Meet legal and regulatory requirements

How do we obtain personal information?

In order to ensure that your investment in an IA Clarington investment product is administered efficiently, we will collect personal information from you or from your dealer. We may collect the information in various ways, including electronic transfers and telephone calls, and may retain copies of documents, or recordings of telephone calls, that contain personal information.

To whom do we disclose personal information?

In order to provide the best possible client service we may be required to disclose personal information to third parties in the normal course of business.

These third parties include:

- Your investment advisor;
- Other financial institutions, securities dealers, and mutual fund companies; for example, when you move your investments from one firm to another;
- Affiliates of IA Clarington;
- Contracted third-party service providers;
- Canadian government, government agencies and regulators; and
- Any other entity as required by law.

IA Clarington may be required to provide personal information in response to a search warrant, court order or other legally valid request.

Obtaining Consent

If you have completed an investment application with us, you have provided us with personal information. Notice of IA Clarington's use of personal information is disclosed on the back of the IA Clarington investment application under the heading of "Your Personal Information". By signing an application form you are consenting to the use of your personal



information. IA Clarington's Privacy Notice explains how we collect, hold, use and disclose personal information. This Privacy Notice may also be sent to you. By continuing to do business with us, you are consenting to the use of your personal information on an ongoing basis, as described under the heading "To whom do we disclose personal information?"

Some investors may have completed an investment application form through a dealer representative or other party that is unrelated to IA Clarington, thereby providing them with personal information. Any personal information which may be disclosed to us through an unrelated party is also subject to IA Clarington's Privacy Policy.

How can you withdraw your consent?

You may withdraw your consent to IA Clarington's use of your information by contacting us. In some circumstances, legal requirements may prevent you from withholding consent. The decision to withhold information may also limit the products or services we are able to provide.

How can you access your personal information?

Upon written request IA Clarington will provide you with access to the personal information we have collected for you. Please note that we may not be able to provide you with this information in certain circumstances, for example: where information contains references to other persons; where information contains proprietary information confidential to IA Clarington, or where information cannot be disclosed for legal reasons.

How can you ensure your personal information is accurate?

The accuracy of your personal information is essential to providing you with excellent service. If you wish to change or update your personal information, please contact us. Please inform us of any errors regarding your personal information right away, so that we may correct our records.

How do we protect your personal information?

Policies, procedures and safeguards have been put in place at IA Clarington to ensure your personal information is protected. Our employees and service providers have access to your personal information to enable them to provide necessary services to you. Any personal information collected from you will only be used for the purposes identified at the time of collecting the information and will be retained for as long as is necessary to fulfill the service, or as required by law.

Security measures including passwords, restricted access to our offices and records, and physical access security have been put in place to protect your information against unauthorized access, modification, loss, theft or general misuse.

Questions, Concerns & Complaints

If you have any questions, concerns or complaints regarding matters of privacy please contact us. In many cases concerns can be resolved by discussing it with one of our Client Service Representatives.

Phone: 1-800-530-0204 or 416-860-9880
Email: privacy@iaclarington.com

If your concern has not been resolved to your satisfaction, please contact our Privacy Officer.

Phone: 1-888-860-9888 or 416-860-9880
Email: privacy@iaclarington.com
Write to: Privacy Officer
IA Clarington Investments Inc.
522 University Avenue, Suite 700
Toronto, ON M5G 1Y7

If after contacting our Privacy Officer your concern remains unresolved, you may contact the Privacy Commission of Canada:

The Privacy Commission of Canada
112 Kent Street
Ottawa, Ontario
K1A 1H3
Phone: 613-995-8210 or 1-800-282-1376

Or in Quebec:

The Commission d'accès à l'information
575, rue St. Amable, Bureau 1.10
Québec, Québec
G1R 2G4
Phone: 418-528-7741 or 1-888-528-7741