



**GLOBEVEST
CAPITAL**

Confidentiality Policy

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1 Purpose and general principles

The purpose of this Confidentiality Policy (hereinafter referred to as "the Policy") is to establish the guidelines governing the management of our customers' personal and professional information. It defines the information that may be collected and how it is collected, used and protected. As our customer, you have the right to know how we protect your personal information and limit its disclosure.

2 Responsibility

The gathering, use and disclosure of data or information about individuals are subject to applicable privacy laws. To this end, Globevest Capital Ltd. has designated a confidentiality officer to ensure compliance with this Policy, which applies to all current and former clients of our firm, including all those who currently invest in our funds or have done so in the past. This Confidentiality Policy describes our policies and procedures for collecting, disclosing and safeguarding "private information", which may include your financial or other information.

3 Consent

The knowledge and consent of the individual are generally required for the gathering, use and disclosure of personal information. You consented to this when you opened your account(s) with us.

The personal information we collect about you comes from the following sources: account opening and update forms, management agreements and other forms.

We also collect information during formal and informal meetings, as well as during routine telephone conversations. This personal information includes your name, address, date of birth, driver's license or passport number, asset value, income and any changes in your personal circumstances. It also includes information relating to your transactions with Globevest Capital Ltd. and with your trustee or otherwise, such as your account balances and the third parties with whom you transact.

Globevest Capital Ltd. is committed to being vigilant about the accuracy of the initial and subsequent personal information we collect, and asks that you keep us informed, as soon as possible, of any changes to, for example, your mailing address, email address or telephone number, your employment status or your income requirements.

4 Identification objectives

The personal information we collect about you is essential to providing you with personalized services that best meet your needs. This personal information may come directly from you or may be provided by your financial institution or custodian.

Personal information may be used for the following purposes:

- Understanding and assessing your ongoing needs and rectifying your portfolio if necessary;
- Communicating with customers, departments and administration, including billing and accounting;
- Internal, external and regulatory auditing;
- Complying with legal and regulatory requirements;
- Facilitating investment transactions with other financial intermediaries;
- Complying with the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

Please note that if you provide us with personal information about other individuals (employees, dependents, etc.), we assume that you have obtained their prior consent.

5 Limiting use, disclosure and retention

Although clients of Globevest Capital Ltd. open accounts with National Bank Independent Network, there is no relationship between Globevest Capital Ltd. and this financial institution. National Bank Independent Network is one of Canada's leading providers of custody, brokerage, clearing, settlement and recordkeeping solutions to independent registered introducing brokers and portfolio managers, such as Globevest. Client asset management is therefore carried out exclusively by Globevest. We share your information with National Bank Independent Network only to enable them to provide you with operational, administrative and support services, to meet legal and regulatory requirements, and for fraud prevention purposes. Unless we have your express permission, Globevest Capital Ltd. will not share your information with any other group for marketing purposes.

Otherwise, we do not disclose any personal information, unless permitted or required by law. This means, first and foremost, that we do not sell customer information – either your personal information or the fact that you are our customer – to anyone. We use your information primarily to carry out transactions on your behalf, as follows:

- In order to complete certain transactions or to make certain changes to your account at your request, it may be necessary to provide your personal information to unaffiliated third parties, such as trustees or custodians of securities and investment dealers;
- We share your personal information if we are required to do so by law or in circumstances permitted by law, such as to protect your account from fraud, or if you otherwise give us permission to do so;
- If you wish us to share personal information with a third party, such as your accountant, auditor or consulting firm, we require written instructions describing the personal information you wish us to share, as well as the name, address, telephone number, fax number and email address of the third party.

6 Legislation and regulation

Applicable laws require organizations to obtain your consent for the collection, use or disclosure of information about you.

The Proceeds of Crime (Money Laundering) and Terrorist Financing Act requires us to comply with certain customer identification, safekeeping, reporting and internal compliance measures. These include reporting all suspicious transactions to the Financial Intelligence Division of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).

In addition, section 41 of the United Nations Act and its implementing regulations impose new obligations on all Canadian financial institutions involved in portfolio management and investment advice. These include rules on freezing assets held directly or indirectly by persons who support terrorism, declaring the ownership of such persons to the RCMP and the Canadian Security Intelligence Service (CSIS), and updating our records on a monthly basis with provincial securities commissions to confirm that our client list does not include the names of individuals or organizations that support terrorism.

7 What happens if you close your account?

If you decide to close your account(s), we will comply with the privacy policies and procedures described in this notice. Globevest Capital Ltd. is subject to legal record retention requirements even after you close your account(s).

8 Who can access your personal information?

Access to your personal information is restricted to those individuals who require access in order to provide services to you and for the purposes set out in these privacy policies and procedures.

9 Security and protection

Globevest Capital Ltd. takes the necessary measures to protect customers' personal information against loss, destruction, theft, unauthorized access, disclosure, reproduction, use or alteration, regardless of the form in which it is held or where it is stored. To this end, various security measures have been put in place.

In addition, passwords, codes and identification numbers used by customers to access their accounts are confidential. Customers are the only people who know them.

9.1 Physical measures

The physical measures put in place include the protection of premises, such as secure access and the safe location of equipment.

9.2 Administrative procedures

Only Globevest Capital employees who need to consult your personal information in the course of their duties have the necessary access.

9.3 Technical measures

The computer systems that store customers' personal information are protected by passwords, encryption, anti-virus software and firewalls.

10 Mandatory reporting of data breaches

In the event that Globevest Capital Ltd. suffers a data breach, the firm will be subject to a number of obligations:

- To determine whether the breach presents a "real risk of serious harm" to any individual whose personal information was breached, by conducting a risk assessment that takes into account the sensitivity of the information and the likelihood of misuse;
- As soon as possible, to notify individuals of any breach that poses a real risk of serious harm to them, and report the breach to the Privacy Commissioner of Canada (the Commissioner);
- To notify any other organization that may be able to mitigate the risk of harm to individuals;
- To maintain a record of any data breach of which the organization is aware and provide it to the Commissioner upon request.

11 Transparency, consultation/access, updating and complaints

Globevest Capital Ltd. will make available, upon request, information about its policies and practices relating to the management of personal information. You may review the personal information we hold about you at any time to verify its content and accuracy. If you have any

questions, concerns or requests in this regard, or if you have any complaints about the protection of personal information, please send us a written request at the following address:

Globevest Capital Ltd.
Attention: Chief Compliance Officer
1005 Lionel-Daunais, Suite 104
Boucherville, QC J4B 0B1

Globevest Capital Ltd. will respond to the client's request within thirty (30) days of receipt. If the client finds that the personal information we hold about him or her is inaccurate or incomplete, Globevest Capital will make the necessary corrections within thirty (30) days of receipt of the corrected information.

12 Responsible for Policy application

The person responsible for applying the Policy at Globevest Capital Ltd. is the Chief Compliance Officer.

13 Review of the Policy

The Policy will be reviewed periodically to ensure that it remains appropriate at all times. The most recent copy of this update will be available on our website.

14 Effective date

This Policy replaces and enhances the relevant sections of Globevest Capital's Internal Control Manual and is effective as of June 2023.