

Privacy Policy Notice

FACTS	WHAT DOES CARDINAL POINT WEALTH MANAGEMENT DO WITH YOUR FINANCIAL INFORMATION?																									
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.																									
What?	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and income ▪ Account balances and assets ▪ Transaction history and investment experience 																									
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Cardinal Point chooses to share; and whether you can limit this sharing.																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; padding: 5px;">Reasons we can share your personal information</th> <th style="width: 25%; padding: 5px;">Does Cardinal Point share?</th> <th style="width: 25%; padding: 5px;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td> <td style="text-align: center; padding: 5px;">Yes</td> <td style="text-align: center; padding: 5px;">No</td> </tr> <tr> <td style="padding: 5px;">For our marketing purposes to offer our products and services to you</td> <td style="text-align: center; padding: 5px;">Yes</td> <td style="text-align: center; padding: 5px;">No</td> </tr> <tr> <td style="padding: 5px;">For joint marketing with other financial companies</td> <td style="text-align: center; padding: 5px;">No</td> <td style="text-align: center; padding: 5px;">Not Applicable</td> </tr> <tr> <td style="padding: 5px;">For our affiliates' everyday business purposes information about your transactions and experiences</td> <td style="text-align: center; padding: 5px;">Yes</td> <td style="text-align: center; padding: 5px;">No</td> </tr> <tr> <td style="padding: 5px;">For our affiliates' everyday business purposes information about your creditworthiness</td> <td style="text-align: center; padding: 5px;">Yes</td> <td style="text-align: center; padding: 5px;">Yes</td> </tr> <tr> <td style="padding: 5px;">For our affiliates to market to you</td> <td style="text-align: center; padding: 5px;">Yes</td> <td style="text-align: center; padding: 5px;">Yes</td> </tr> <tr> <td style="padding: 5px;">For non-affiliates to market to you</td> <td style="text-align: center; padding: 5px;">No</td> <td style="text-align: center; padding: 5px;">Not Applicable</td> </tr> </tbody> </table>			Reasons we can share your personal information	Does Cardinal Point share?	Can you limit this sharing?	For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No	For our marketing purposes to offer our products and services to you	Yes	No	For joint marketing with other financial companies	No	Not Applicable	For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No	For our affiliates' everyday business purposes information about your creditworthiness	Yes	Yes	For our affiliates to market to you	Yes	Yes	For non-affiliates to market to you	No	Not Applicable
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Questions?	Call 602.374.3727 or go to www.cardinalpointwealth.com																									

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Who we are	
Who is providing this notice?	Cardinal Point
What we do	
How does Cardinal Point protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and building.
How does Cardinal Point collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Deposit money ▪ Seek advice about your investments ▪ Enter into an investment advisory contract ▪ Tell us about your investment or retirement portfolio or earnings <p>We also collect your personal information from others, such as affiliates or other companies.</p>
Why can't I limit all sharing?	<p>U.S. federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes— information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>U.S. state laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ Focus Operating, LLC, Connectus Group, LLC, Focus Risk Solutions, LLC and Focus Client Solutions, LLC.
Non-affiliates	<p>Companies not related by common ownership and control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ We do not share with non-affiliates so they can market to you.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or service to you.</p> <ul style="list-style-type: none"> ▪ We do not jointly market.
Other Important Information	<ul style="list-style-type: none"> • This document is meant to also serve as our privacy notice under applicable Canadian federal and provincial law. • Our privacy policy and the above disclosure may change from time to time. We will provide you notice of any material change to this disclosure before we implement the change. • In addition to the prescribed information categories of information we collect found on page 1, Cardinal Point will also collect non-public identifying information including your name, address, date of birth, e-mail address, telephone number, credit history, occupation, financial goals and income. • In addition to the prescribed definition of "For our everyday business purposes" found on page 1, Cardinal Point may also provide information to service providers

assisting with accounting, auditing, legal and compliance obligations or general maintenance of industry standards.

Cardinal Point Capital Management ULC ('Cardinal Point') will treat all your personal and confidential information in accordance with Cardinal Point's privacy policy, which has been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA" or the "Act"). PIPEDA sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act.

The Ten Principles of PIPEDA

The following principles form the basis of Cardinal Point's Privacy Policy:

1. **Accountability:** Cardinal Point is accountable for the personal information it collects, uses, retains and discloses in the course of our commercial activities, including, but not limited to, the appointment of a Chief Privacy Officer;
2. **Identifying Purposes:** Cardinal Point will explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;
3. **Consent:** Cardinal Point must obtain an individual's express or implied consent when they collect, use, or disclose the individual's personal information;
4. **Limiting Collection:** the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
5. **Limiting Use, Disclosure and Retention:** personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the individual consents to the alternative use or disclosure;
6. **Accuracy:** Cardinal Point is required to keep personal information in active files accurate and up-to-date;
7. **Safeguards:** Cardinal Point will use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.
8. **Openness:** Cardinal Point will inform their clients and train their employees about their privacy policies and procedures;
9. **Individual Access:** an individual has a right to access personal information held by Cardinal Point and to challenge its accuracy if need be; and
10. **Questions, Concerns and How to make a Complaint**

If an individual has a concern about Cardinal Point's personal information handling practices, a complaint, in writing, may be directed to the Chief Privacy Officer at:

3280 Bloor Street West, Centre Tower, Suite 500
Toronto, ON M8X 2X3
Telephone 647.598.3951
Attn: Privacy Officer