

Effective date: May 2025

Privacy Policy Notice

FACTS	WHAT DOES CARDINAL POINT WEALTH MANAGEMENT DO WITH YOUR PERSONAL INFORMATION?
Why?	<p>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.</p> <p>This notice applies if you are a customer, a user who visits our website (accessible through the following domain: https://cardinalpointwealth.com) or a job applicant who applies for a career opportunity with us.</p> <p>In this notice, we describe our policies and practices with respect to the collection, use and disclosure of personal information and the measures taken to ensure its continued protection. We also describe the rights and choices you have regarding your privacy.</p> <p>In some cases, at the time of collection of your personal information, we may provide you with additional information regarding the processing of your personal information. We may also, in certain circumstances, obtain your specific consent to the use or sharing of your personal information, including where required by law.</p>
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"> ▪ Identifiers, such as your full name, email address, mailing address, telephone number and other information you provide to us when you contact us or when you apply for a career opportunity at Cardinal Point. We may also collect your Social Security number when you use our services and/or products. ▪ Financial and banking information, such as your income, credit history, account balances and assets, transaction history, investment experiences and financial goals when you use our services and/or products. ▪ Browsing activity, when you visit our website. This information is collected via automated means, such as cookies, web beacons and similar technologies, and may include your IP address, device ID, browser type, data about the web pages you visited on our websites, your language preferences, email bounce backs and click-throughs. ▪ Professional or employment-related information, which may include some of the information described above, as well as your occupation when you use our services or your letters of motivation, your resume, references and any additional information you provide when you apply for a career opportunity at Cardinal Point.

	<ul style="list-style-type: none"> ▪ Any other information you provide to us, such as when you contact us by email, on the phone or in-person.
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.

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

Questions?	<p>If you have any questions or complaints about how we handle your personal information, please contact our Privacy Officer at the following addresses:</p> <ul style="list-style-type: none"> • Email: (insert email) • Postal address: 3280 Bloor Street West, Centre Tower, Suite 500 Toronto, ON M8X 2X3 <p>You may also call 602.374.3727 or go to www.cardinalpointwealth.com</p>
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Who we are	
Who is providing this notice?	Cardinal Point
What we do	
How does Cardinal Point protect my	To protect your personal information from loss, misuse, sharing or alteration, we use security measures that comply with applicable law. These measures

<p>personal information?</p>	<p>include:</p> <ul style="list-style-type: none"> • A privacy framework governing the protection of personal information through its lifecycle. This framework defines the roles and responsibilities of Cardinal Point personnel, provides a process for dealing with complaints regarding the protection of the information, and addresses the retention and destruction of personal information. • 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, passwords, antivirus software, computer safeguards, secured files and building and similar measures. • A designated Privacy Officer to monitor Cardinal Point’s compliance with applicable privacy laws. • Employee privacy and data security training.
<p>How does Cardinal Point collect my personal information?</p>	<p>We collect your personal information in a variety of ways, including directly from you, from third parties and through our website.</p> <p>a. Directly from you</p> <p>We may collect personal information directly from you, such as when you 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, apply for a career opportunity with us or contact us with an inquiry or to report a problem with our website or Cardinal Point devices.</p> <p>b. From third parties</p> <p>In certain circumstances, we may receive personal information from third parties, including when you provided your consent for credit verifications, credentials verification and background checks.</p> <p>c. Through our website</p> <p>We collect technical information (e.g. your IP address, browser type and device ID) and information about your device and browser (e.g. page views and clickstream data) when you visit our website, using technologies, such as cookies. Some of these technologies may be operated by third parties. This information supports the functioning of our website and helps us understand how you navigate and use our website. This information helps enhance our website’s design, functionality, and optimizing our marketing efforts.</p>

	<p>We currently use the following types of cookies on our website(s):</p> <ul style="list-style-type: none"> • Strictly necessary cookies: these cookies are essential to allow you to fully use our website and its full features. These cookies do not gather information about you that could be used for marketing. These cookies cannot be turned off as they are essential for enabling the basic functionalities of the website. • Functional cookies: these cookies help perform certain functionalities like sharing the content of the website on social media platforms, collecting feedback, and other third-party features. They allow the website to remember your language preferences. • Analytics cookies: these cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc. • Advertising cookies: these cookies are used to provide visitors with customized advertisements based on the pages you visited previously and to analyze the effectiveness of the ad campaigns.
How does Cardinal Point uses my personal information?	<p>We may use your personal information for the following purposes or otherwise, with your consent or as permitted or required by law:</p> <ul style="list-style-type: none"> • We may use your personal information for general business purposes such as providing or delivering a product or service requested, processing your transactions, maintaining your account(s), managing our business, including our website, processing job applications, responding to your inquiries, meeting our contractual, legal and regulatory obligations, including as well as for purposes relating to information, system or network security. • We may use personal information from job candidates to verify suitability for employment and for pre-screening purposes, including verifying education, qualification, references, criminal background and credit checks when relevant to the position. • We may use your personal information for marketing purposes, such as to offer you our products and services. • We may use technical information collected by cookies to enhance our website's design, functionality, and optimizing our marketing efforts, subject to your privacy choices.
When does Cardinal Point shares my personal information with	<p>We may share your personal information with our business partners and our service providers, and in the context of a sale or transfer of our business or similar transaction. We may also share your personal information with your consent or in accordance with applicable law.</p> <p>a. Business Partners and Affiliates.</p>

<p>other organizations?</p>	<p>Your personal information may be shared with businesses such as business partners and affiliates with whom we work and/or that use our products, to the extent permitted by law. For instance, we may share your personal information with business partners and affiliates for general business purposes, including with regards to your transactions and experiences and your creditworthiness.</p> <p>b. Service Providers. We may share personal information with our agents, vendors or other organizations that provide services on our behalf, for the purposes set out in this notice. These service providers help us operate and manage our website, information systems, infrastructure, marketing, accounting, auditing, legal and compliance obligations or general maintenance of industry standards. They provide services to us, such as recruiting, background checks, email communications, mail delivery, data hosting and analytics services (e.g. analyzing usage of our website). When Cardinal Point shares personal information with our service providers, we ensure by contractual means that the transferred personal information is used only for the purposes for which the service provider is retained and is protected to the same degree as it is when in our possession.</p> <p>c. Sale or Transfer of Our Business or Other Transaction. We may decide to sell or transfer all or part of our business to a third party, merge with another entity, secure our assets or proceed with any other financing or other strategic capital transactions (including insolvency or bankruptcy proceedings), restructuring, share sale or other change in corporate control. We may share your personal information when required for the purposes of such a transaction in compliance with applicable laws.</p> <p>d. Other permitted reasons. We may share your personal information when permitted or required by applicable law, for instance: With governmental authorities, law enforcement and courts when compelled by law; and For the purposes of detecting or suppressing fraud or criminal activity, protecting our assets and interests, conducting an internal or external investigation into any actual or suspected illegal activity or managing, defending or settling any actual or potential loss in connection with the foregoing.</p>
<p>Why can't I limit all sharing?</p>	<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

	U.S. state laws and individual companies may give you additional rights to limit sharing.
Where does Cardinal Point shares my personal information?	Cardinal Point's service providers may access, process or store your personal information outside of the jurisdiction where you reside, including in Canada and the United States. As a result, when your personal information is used or stored in a jurisdiction other than where you are residing, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.
What are my privacy choices?	<p>You have choices about the way Cardinal Point handles your personal information.</p> <p>a. Changing Your Cookie Preferences</p> <p>When you first visited our website, you are presented with a pop-up banner that allows you to make choices regarding your cookies preferences. By default, only necessary cookies are activated on our website. You can choose to enable or disable some or all of these cookies but disabling some of them may affect your browsing experience.</p> <p>b. Restricting Collection, Use and Disclosure of Your Personal Information</p> <p>You may withdraw your consent to the collection, use and disclosure of personal information in accordance with this notice at any time upon reasonable notice to Cardinal Point in writing, subject to legal or contractual restrictions. To withdraw your consent, please contact us in writing using the relevant contact information listed in the Questions? section. The withdrawal of your consent may affect our ability to answer your inquiry and/or process your job application. In certain situations, we may be entitled to retain your personal information in order to comply with applicable legal requirements, to establish, exercise or defend our rights or legal claims, and for other legitimate business purposes.</p>
How may I assess and correct my personal information?	You may be entitled to access your personal information and request the rectification information that is inaccurate, incomplete or no longer up to date, subject to limited exceptions set out in applicable laws. Depending on the jurisdiction where you reside, you may also be entitled to request the rectification of your personal information if our collection, disclosure or retention of such information is not authorized by law. To exercise your rights, please contact us in writing using the relevant contact information listed in the Questions? section.

How long does Cardinal Point retain my personal information?	We store your personal information for as long as is necessary to respond to your inquiry, to process your job application, to manage our business operations, and to comply with our legal and regulatory obligations. Once no longer required, your personal information will be securely destroyed or anonymized in accordance with legal requirements.
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Definitions	
Affiliates	Companies related by common ownership and control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • Focus Operating, LLC, Connectus Group, LLC, Focus Risk Solutions, LLC and Focus Client Solutions, LLC.
Non-affiliates	Companies not related by common ownership and control. They can be financial or nonfinancial companies. <ul style="list-style-type: none"> • We do not share with non-affiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or service to you. <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 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.