



Privacy Policy

The Personal Information Protection and Electronic Documents Act (the Act) regulates the way private sector organizations collect, use and disclose personal information. Its main objective is to ensure personal information collected from clients is used for its stated purpose and to safeguard such information. 'Personal Information' is defined as information about an 'identifiable individual'. This includes such things as age, income, education, home address and phone number. It does not cover general contact information such as name, title, business address or business phone number. Information that KAM has collected for completion of the IPS is subject to the requirements of the Act.

KAM recognizes the importance of privacy and recognizes the sensitivity of personal information received by it in the conduct of its business. This policy has been prepared with this objective in mind.

The Need for Personal Information

We have collected Personal Information from clients to meet certain regulatory requirements and to help us establish an appropriate investment objective and risk tolerance for your managed account(s) and to comply with federal anti-money laundering regulation. This information will necessarily include personal information about you and, in certain cases, about individuals (e.g. information on a person with trading authority over the account.)

Collection, Use and Disclosure of Personal Information

Where practical, KAM will try to collect personal information directly from the person to whom the information pertains. However, where appropriate, we may collect personal information from publicly available sources. We will only collect personal information necessary for the purposes stated in the section titled, The Need for Personal Information.

The Act provides that an individual is deemed to consent to the collection, use or disclosure of personal information if they voluntarily provide the information for the stated purpose, and it is reasonable that a person would voluntarily provide that information.

By retaining KAM for portfolio management services, we consider that you have consented to our collection, use or disclosure of personal information as necessary to properly represent you in these financial and investment matters. You have also consented to sharing of personal and financial information with your Referring Agent/ Firm if applicable and / or with the professional(s) which you listed on your Client Information Statement.

Where necessary, to fulfil our regulatory obligations, we may collect personal information about individuals other than our clients in accordance with the provisions of the Acts.

When we collect personal information about individuals directly from them, except in situations when their consent to the collection is deemed, we will advise them of the purpose for which the information is collected.

Obtaining consent from the individual is a key element of the Act. However, this obligation is not absolute. The Acts also permit us to collect, use or disclose personal information about an individual without the individual's consent, in certain circumstances. These include (but are not limited) to circumstances where:

- the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- collection, use, or disclosure is reasonable for the purposes of an investigation or proceeding;
- the personal information is available to the public from a prescribed source; or
- the collection, use, or disclosure is required or authorized by a Federal or Provincial statute or regulation.



When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate and complete. The Act also allows us, for legal or business purposes, to retain personal information for as long as is reasonable, but also imposes obligations upon us to ensure that procedures are in place to destroy the personal information when it is no longer required.

Security of Personal Information

We recognize our professional and legal obligations to protect the information collected from our clients and about other individuals, during the normal course of our business. KAM has implemented policies and procedures to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information.

Requests for Access to Personal Information

Pursuant to the Act, an individual may submit a written request to us to provide them with:

- a record of the personal information of the individual under our custody or control;
- information about the purposes for which their personal information under our custody or control has been and is being used by us; and
- the names of persons to whom and the circumstances in which their personal information has been and is being disclosed by us.

We will respond to requests in the time allowed under the Act, and will make a reasonable effort to assist applicants, and to respond as accurately and completely as reasonably possible. Requests may be subject to certain fees and disbursements in accordance with the provisions the Act.

An individual's ability to access his or her personal information under our control is not absolute. The Act provides that we *must not* disclose personal information where:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure would reveal personal information about another individual and consent is not obtained; or
- the disclosure would reveal the identity of an individual who has, in confidence, provided us with an opinion about another individual, and the individual providing the opinion does not consent to the disclosure of his or her identity.

The Act further provides that we may choose not to disclose personal information where:

- the personal information is protected by any legal privilege;
- the disclosure of the information would reveal confidential commercial information, and it is not unreasonable to withhold that information;
- the personal information was collected by us for an investigation or legal proceeding;
- the disclosure of the personal information might result in similar information no longer being provided to us when it is reasonable that it would be provided;
- the personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act under an agreement, under an enactment, or by a court; or
- the personal information relates to or may be used in the exercise of prosecutorial discretion.

The above examples are not exhaustive, and you are encouraged to examine the provisions of the Act for a complete list.

Requests for Correction of Personal Information



An individual may also submit a written request to us to correct errors or omissions in the personal information of the individual that is in our custody or control. When we receive such a written request, KAM will:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the personal information but annotate the personal information that a correction was requested but not made.

Contacting or Communicating with Us

If you have any questions with respect to our policies concerning the handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact KAM's CCO. CCO contact details are set out under section XII above.

If you are dissatisfied with our handling of your personal information, we invite you to contact our CCO in writing (see section XII for CCO contact information), setting out the reasons for your concern. If you remain dis-satisfied you may wish to contact the Office of the Information and Privacy Commissioner.

We also encourage you to obtain a complete copy of the Act to further determine the rights and obligations contained within that legislation and to obtain independent legal advice if necessary.

The contact information for the Office of the Privacy Commissioner and a copy of the Act can be obtained from the following link: <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>