

Professionals' Financial Inc. ("Professionals' Financial") has made a commitment to protect its clients' personal information and privacy. This policy explains the practices for collection, use and disclosure of personal information regarding our clients, and the measures adopted to ensure that this information is treated adequately and confidentially.

Professionals' Financial complies with the Act respecting the protection of personal information in the private sector (hereinafter "the Act"). Our Chief Compliance Officer is responsible for overseeing compliance with this legislation.

## PROFESSIONALS' FINANCIAL COMPANIES

Professionals' Financial - Private Management and Professionals' Financial - Mutual Funds are two entities wholly owned by Professionals' Financial. To allow you to benefit from the full range of our products and services, and to the extent authorized by the Act, these two entities, from time to time, with your consent, may exchange information allowing them to understand your needs better so that they can offer financial products and services likely to interest you. Professionals' Financial - Private Management and Professionals' Financial - Mutual Funds will not be able to communicate this personal information to other third persons, unless they obtain your consent, or if the Act expressly permits it.

## DEFINITION

"Personal information" is any information which relates to an individual and allows that person to be identified. Among others, the following attached to your name is personal information : your social insurance number, your occupation, your civil status, your address, your telephone number, your email address, your fax number or other information that may be used to communicate with you, as well as financial information concerning you or your spouse.

## PRINCIPLES OF CONFIDENTIALITY

Our ten principles of confidentiality are:

### 1. Accountability

All our employees are bound to protect the confidentiality of the personal information to which they have access and, at the time they are hired, must sign a commitment prohibiting communication of information concerning the clients to unauthorized persons. We also ensure that they are regularly notified of the changes made to the Act and to our procedures concerning protection of personal information.

Our Chief Compliance Officer is a member of the management team and has the duty of ensuring and supervising the protection of personal information, particularly with regard to policies, dispute resolution, education and communication. He must also report on matters concerning the confidentiality of personal information to our Boards of Directors and our senior management for the Financial as a whole.

### 2. Determination of the Purposes of Collection

When you become a client of Professionals' Financial, we ask you for personal information for various purposes, including to:

- / Establish your identity
- / Prevent or detect fraud
- / Verify whether a product or service suits you
- / Understand your needs for financial services
- / Establish your eligibility for our products or services so that we can offer them to you
- / Collaborate with regulators
- / Comply with the requirements of the federal or provincial legislation
- / Measure the quality of its customer service for compliance purposes. To this end, Professionals' Financial may monitor and record its telephone conversations with you.

### 3. Consent

Professionals' Financial has the obligation to obtain your consent before proceeding to collect from third persons personal information concerning you, except where exempted by the Act. You certify when your account is opened that you consent to the collection, use and disclosure of personal information.

However, Professionals' Financial is under no obligation to obtain your consent before communicating personal information to third persons that is necessary to the conclusion and performance of certain services we offer you.

Thus, for regulatory purposes, the self-regulatory organizations, including the Investment Industry Regulatory Organization of Canada, Bourse de Montréal Inc. and the Canadian Investor Protection Fund (collectively, the "SROs") require access to the personal information of current and former clients, employees, agents, directors, officers, partners and other persons, for which personal information has been collected or used by the regulated persons. The SROs collect, use or disclose this personal information obtained from regulated persons for regulatory purposes, in particular:

- / Supervision of trading-related activities
- / Sales, financial compliance and trade desk reviews
- / Trading and other regulatory audits
- / Investigation of potential regulatory and statutory violations
- / Regulatory databases
- / Enforcement or disciplinary proceedings
- / Reporting to the securities regulators, and
- / Sharing of information with the securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

#### 4. Limits applicable to collection

We only gather the information necessary to the subject of the file to the extent that the Act permits. For example, we collect personal information concerning you within the context of the opening or administration of your account. In most cases, this is information you provided when you completed the relevant documentation required to open or maintain your account with Professionals' Financial - Private Management or Professionals' Financial - Mutual Funds.

#### 5. Restrictions on Use, Disclosure and Retention

Professionals' Financial uses or communicates your personal information only for the purposes for which it was collected. In no case do we sell or give lists of our clients to other firms for their own use.

Professionals' Financial observes the securities legislation and regulations governing the period during which we keep your personal information. It will be kept for as long as the purposes for which it was collected continue or when legally required.

#### 6. Accuracy

We undertake to maintain the accuracy of your personal information and ensure that it is complete and up to date. If you find errors in our data or if the information concerning you is modified, you must notify us immediately so that we can make the necessary changes. You simply have to contact us at 514-350-5050 or at 1-888-377-7337, or in writing to 2 Complexe Desjardins, East Tower, 31st Floor, P.O. Box 1116, Montréal, Québec H5B 1C2. We will act on your instructions as soon as possible.

#### 7. Security Measures

Professionals' Financial applies very strict security measures to protect your personal information against any unauthorized access, regardless of the format in which we hold it.

The physical and material security measures include:

- / Offices with controlled access and locked filing cabinets
- / Restriction of access to your personal information to a selected group of persons
- / Contractual obligations with third parties who must have access to your personal information, obliging them to protect the confidentiality and security of your personal information.

Information systems security measures include:

- / Use of passwords, PINs and firewalls
- / Restricted access to our data processing and storage rooms
- / Encryption of electronically transmitted data
- / Use of a secure link protocol (SSL protocol)
- / A regular review of our security practices
- / A regular upgrade of our technology to protect the confidentiality and integrity of the information about you
- / Use of cookies as an additional means of security which store data only for the period during which you are connected to our Web site (it should be noted that these cookies cannot access your computer files or data). If you are afraid of setting your browser to accept cookies when you are browsing on other Web sites, we recommend you add [www.professionalsf.com](http://www.professionalsf.com) to your browser's list of reliable sites
- / Prevention of email fraud: we never send email messages to ask you to provide us with confidential information, such as your password or your account number. If you receive such requests by email, please do not follow the instructions appearing in these emails allegedly issued by Canadian banks, because you could compromise the security of your information by clicking on the links leading to counterfeit Web sites.

#### 8. Transparency

Our confidentiality policy is accessible at any time on our Web site at [www.professionalsf.com](http://www.professionalsf.com), or on request from our Chief Compliance Officer.

#### 9. Accessibility

On request, we will give you access to the personal information we have in our records. You can also ask how this information is used and make sure that it is accurate and complete, and update it as needed, to the extent that the Act permits.

#### 10. Questions Regarding Confidentiality

We are determined to enforce our confidentiality policy regarding protection of personal information. If you have any questions or concerns regarding the confidentiality and security of your personal information, or the manner in which we apply our policy, do not hesitate to contact us at 514-350-5050 or at 1-888-377-7337.

### WITHDRAWAL OF CONSENT

Subject to any legal or contractual prescription, you can modify or withdraw your consent to collection, use and communication of personal information concerning you at any time by sending a written notice to Professionals' Financial at 2 Complexe Desjardins, East Tower, 31st Floor, P.O. Box 1116, Montréal, Québec H5B 1C2.

However, you cannot refuse to consent to our collection, use and disclosure of the information required by third-party service providers whose contribution is essential to the delivery of the services or by government agencies and regulators, including self-regulatory organizations.

### POLICY UPDATE

Any change in our policy concerning protection of personal information will be incorporated promptly into this policy. We reserve the right to add new provisions to this policy and amend it or eliminate points if we consider it appropriate to do so. The date of the latest amendment to this Policy is indicated on our website, in the "Privacy Policy" section ([www.professionalsf.com](http://www.professionalsf.com)).