

## *Gardon Securities Ltd. Privacy Policy*

### *Sites covered by this Policy Statement*

*This Privacy Statement applies to all Gardon Securities Ltd. owned websites and domains, and our wholly owned subsidiaries (Gardon Securities Ltd. websites.)*

### *Links to non Gardon Securities Ltd. websites*

*The Gardon Securities Ltd. websites may provide links to third-party websites for your convenience and information. If you access those links, you will leave the Gardon Securities Ltd. website. Gardon Securities Ltd. does not control those sites or their privacy practices, which may differ from Gardon Securities Ltd.. We do not endorse or make any representations about third-party websites. The personal data you choose to give to unrelated third parties is not covered by the Gardon Securities Ltd. Privacy Statement. We encourage you to review the privacy policy of any company before submitting your personal information. Some third-party companies may choose to share their personal data with Gardon Securities Ltd.; that sharing is governed by that third-party company's privacy policy.*

### *Types of information we collect*

*This Privacy Statement covers personal information, non-personal data collection and aggregate reporting.*

*Personal information is information that is associated with your name or personal identity. Gardon Securities Ltd. uses personal information to understand better your needs and interests and to provide you with better service. Once you choose to provide us with personal information, you can be assured it will be used only to support your customer relationship with Gardon Securities Ltd. We take seriously the trust you place in us. Gardon Securities Ltd. will not sell, rent or lease your personal information to others.*

*On some pages and links at Gardon Securities Ltd., you can order products or services, request information, subscribe to marketing or support materials. The types of personal information you provide to us on these pages may include name, address, phone number, e-mail address, user IDs and passwords, billing and transaction information, credit card information and contact preferences.*

### *How we use your information*

*Gardon Securities Ltd. uses your personal information to provide you with services and to help us better understand your needs and interests. Specifically, we use your information to help you complete a transaction or order, to communicate with you, to provide service and support, to update you on services and benefits, to personalize promotional offers and to*

*personalize the Gardon Securities Ltd. website. Credit card information is used only for payment processing and fraud prevention. This information is not used for any other purpose by our financial services providers or Gardon Securities Ltd. and will not be kept longer than necessary for providing the services, unless you ask us to retain your credit card information for future purchases.*

*Non-personal data is aggregated for reporting about Gardon Securities Ltd. website usability, performance and effectiveness. It is used to improve the customer experience, usability and site content.*

#### *Who we share your information with*

*Gardon Securities Ltd. will not sell, rent or lease your personal information to others. Gardon Securities Ltd. will not share your personal information with third parties except in responding to your requests for products or services. Your permission will be requested when you submit your information. Gardon Securities Ltd. shares customer information across Gardon Securities Ltd. -owned business entities and companies working on our behalf, but only as required to meet your product or service requirements.*

*Gardon Securities Ltd. occasionally may contract with third-party service providers and suppliers to deliver complete products, services and customer solutions. Suppliers and service providers are required to keep confidential the information received on behalf of Gardon Securities Ltd. and may not use it for any purpose other than to carry out the services they are performing for Gardon Securities Ltd. These service providers may change or we may contract with additional service providers to better accommodate our customers. Gardon Securities Ltd. will not share personal information with any other third parties without your permission, unless required by law enforcement action, subpoena, or local law.*

*Gardon Securities Ltd. or its related entities could merge with or be acquired by another business entity or some or all of their respective assets could be acquired. If such a combination or acquisition occurs, Gardon Securities Ltd. will make every reasonable effort to notify you in the event we share with the merging or acquiring entity some or all of your personal information to continue serving you.*

#### *Your information and third-party companies*

*Certain Gardon Securities Ltd. services are linked with those from unrelated third-party companies, some which offer you the option to share with both Gardon Securities Ltd. and the third party personal data you provide. We will not share your personal information with those third-party companies.*

#### *Keeping your information secure*

*Gardon Securities Ltd. is committed to protecting the information you provide us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, Gardon Securities Ltd. has in place appropriate physical and managerial procedures to safeguard the information we collect.*

#### *Contacting us*

*We value your opinions. If you have comments or questions about our privacy policy, please send them to Gardon Securities Ltd., Attention: Shelly Ross, General Manager. This privacy statement applies to Canada*