



# Privacy Policy

## Preface

Mountain Town Properties Ltd. is committed to ensuring and protecting the privacy and confidentiality of its clients' personal information. This document briefly describes how we collect, hold, use and whenever necessary, disclose your personal information. It also summarizes your right to have access to or correct the information as necessary. If you have any questions about our privacy policies, please contact Mountain Town Properties Ltd. 250-362-5556 or mail your concerns to:

Mountain Town Properties Ltd., Box 2277, Rossland, British Columbia, Canada V0G 1Y0

## Client Records and Personal Information

The personal information collected about you is held in a "client record." This information likely includes, at a minimum, your name, birth date, account holdings and, if applicable, the name, address and social insurance number of your spouse or beneficiary. Depending on the type of service you request, additional personal information may be held in your client record. You provided this information to Mountain Town Properties Ltd either or your financial advisor at the time the account was opened or as the information became necessary throughout the service process.

## Collecting, Holding, Using and Disclosing Personal Information

Mountain Town Properties Ltd. may collect, hold and use the personal information as well as collect personal information from and disclose personal information to the third parties identified in Section 4, for the following purposes;

- Identifying you and ensuring the accuracy of information contained in your client record;
- Establishing and administering your account, determining, maintaining, recording and storing account holdings and transaction information in your client record;
- Executing transactions with or through Mountain Town Properties Ltd. including transferring funds by electronic or other means;
- Providing you and your financial advisor with account statements, income tax information, financial statements, transaction confirmations or other information that you and your financial advisor may request to service your account;
- Protecting its own business interests including collecting a debt owed to Mountain Town Properties Ltd. or allowing the performance of a transaction;
- Meeting legal and regulatory requirements;
- Verifying information previously given by you with any other organization when necessary for the purposes set out in this document;
- For any other purpose you and Mountain Town Properties Ltd. and/or your accountant may agree upon from time to time.

## Consent

Your knowledge and consent to Mountain Town Properties Ltd.'s use and disclosure of your personal information is important. We rely on the following actions of your consent to access your personal information:

- Voluntary provision of personal information directly to Mountain Town Properties Ltd. or through your accountant;
- Your express consent or acknowledgement contained within a written, verbal or electronic application process;
- Your consent solicited by Mountain Town Properties Ltd. (or our agent) for specific purpose;
- Your receipt of this Privacy Policy; until you notify Mountain Town Properties Ltd. of a withdrawal of your consent; or
- Your consent given through your authorized representative such as a legal guardian, agent or holder of a Power of Attorney.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw your consent at anytime. If you wish to withdraw consent, please make your request via registered mail to the address stated in the preface. In some circumstances, legal requirements may prevent you from withholding consent. Your decision to withhold consent may also limit the products and services Mountain Town Properties Ltd. is able to provide to you.

## Third Parties

Mountain Town Properties Ltd. may collect your personal information from third parties such as your lawyer, credit agency, chartered bank or others related to Mountain Town Properties Ltd. or other financial institutions. When Mountain Town Properties Ltd. transfers personal information to its service providers; we can not ensure the transferred information is used solely for the purposes for which the provider was retained Mountain Town Properties Ltd. may obtain and exchange information regarding a client's credit history from any recognized credit agency, chartered bank or others.

## Location of Your Client Record and Safeguards for your Personal Information

We take all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- Restricted file access to personal information;
- Premises security.

## Right to Access and Correct Your Personal Information

Except in limited circumstances described in the legislation, you are entitled to access, through a written request, the personal information contained in your client record. You may verify this personal information and request that any inaccurate information be corrected. Please contact us, in writing, should you wish to access and/or change your information.

## Limits on How Long Personal Information is kept

Mountain Town Properties Ltd. will only retain your personal information as long as necessary in order to comply with legislation. When we destroy this information, we will use safeguards to prevent unauthorized parties from gaining access to the information during the process.