

# Privacy Policy

## Protecting Your Personal Information

### Lightyear and Your Privacy

Lightyear Capital Inc. considers your personal privacy to be an important part of our service to you. We understand the need to safeguard information about you that you have entrusted to us. As part of our commitment to you we have adopted principles designed to protect your privacy and prevent misuse of your personal information and help you understand our commitment to your personal privacy.

References to “Lightyear”, “we” or “our” are to Lightyear Capital Inc. Where we use the term “personal information” we are referring to any information that identifies you as an individual and includes information with respect to your name, address, age, gender, income, marital status, finances, employment, trading history and website use information, together with your personal references and identification numbers (such as a social insurance number).

Our privacy policy applies to personal clients, including individuals carrying on business alone or in partnership with other individuals. The following sections will answer most of the important questions that you may have about how we gather, protect and use personal information, and how we will hold ourselves accessible and accountable to you.

### Lightyear’s Principles on Privacy

We have incorporated certain principles for the protection of personal information in our privacy policy.

- *Collecting and Using Personal Information* - We will explain how we intend to use your personal information prior to or when we are collecting it and we will limit the personal information we collect to what we need for those purposes. We will use it only for those purposes we have explained to you and we will obtain your consent if we wish to use your personal information for any other purpose.
- *Disclosing Personal Information to Others* - We may provide your personal information to other persons not affiliated with Lightyear, such as regulators, service providers or credit reporting agencies, but only where we have your consent or where we are required or permitted to do so by law.
- *Retaining and Protecting Personal Information* - We will retain your personal information only for the time it is required for the purposes we explain or as otherwise required by law. We will protect the personal information we obtain about you with appropriate safeguards and security measures.
- *Access and Accuracy* - We will provide you with reasonable access to your personal information on record with Lightyear and information about Lightyear’s use and disclosure of that information. We will make every reasonable effort to keep your personal information accurate and up-to-date.
- *Accountability and Openness to Your Privacy Concerns* – We will hold ourselves accountable to you and we will investigate and respond to your concerns about any aspect of our handling of your personal information. We will explain the application of our privacy policy to your personal information and explain your options of refusing or withdrawing consent to the collection, use and release of your personal information, and we will record and respect your choices.

### Why Does Lightyear Collect Personal Information?

We collect, retain, and use personal information about you only when we reasonably believe that it will help administer our business or provide products, services and other opportunities to you as our client. We collect and retain personal information about you only for specific business purposes – and we will tell you why we are collecting and retaining it on your request. The information we ask for depends on the products or services you request and in most cases are required by law or the policies of the regulatory bodies which we are subject.

Your social insurance number is required for products that earn investment income, in order to comply with the Canada Revenue Agency's income reporting requirements. Providing your social insurance number for credit reporting purposes is optional. If you provide your social insurance number, we also use it to keep your personal information separate from that of other clients with a similar name, including information we obtain with your consent through the credit approval process.

## **How Does Lightyear Collect Personal Information?**

We obtain most of our information about you directly from you. With your consent, we may obtain personal information about you from third parties. For credit or margin purposes, for example, we may need to know your creditworthiness. For this reason, we may contact other lenders or credit reporting agencies to give us information on your credit history. We may also contact references you have provided to verify information that you have given us. We will not do this without your consent, but please remember that if you do not give your consent we may not be able to extend credit or margin services to you.

## **When Does Lightyear Release Personal Information?**

Lightyear does not sell client lists or personal information to others.

We do not reveal personal information about you to parties outside our affiliated companies for their independent use unless you request or authorise it, the information is provided in order to complete a transaction initiated by you or the disclosure otherwise is lawfully permitted or required. We may disclose information to the authorities to serve a clear public interest and fulfil our public duty – such as to protect against fraud, money laundering or other criminal activity. We may, from time to time, be requested to disclose information to securities regulatory and securities oversight organizations to which we are subject such as the Investment Industry Regulatory Organization of Canada for the purposes of an audit or investigation relating to specific accounts or our business generally. In certain circumstances, Lightyear may disclose your personally identifiable information if it believes, in good faith, that disclosure is otherwise necessary or advisable to protect its interests.

Sometimes it is necessary to provide personal information about you to a party outside our affiliated companies, such as to a vendor or service company that we hire to do our data processing or prepare your account statements or to provide support or services for one or more of our products. These vendors and service companies agree to safeguard confidential information about you and your products and services with us and must abide by applicable law.

## **Does Lightyear Provide Options?**

It is always your choice whether or not to provide personal information or to consent to our obtaining personal information about you from third parties. In many cases you are free to refuse or withdraw your consent at any time. If you choose not to provide requested personal information or consents, we may not be able to provide certain products and services to you or you may be ineligible for or be unable to use certain products and services we provide. For example, you may refuse consent for us to do a credit check, but we may not be able to extend credit or margin services to you.

Lightyear will explain your options of refusing or withdrawing consent to the collection, use or release of your personal information, and we will record and respect your choices. If you wish to discuss your options you may do so by contacting Lightyear's designated privacy officer set out below. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent.

## **How Long Does Lightyear Retain Personal Information?**

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. The length of time we retain information varies depending on the product or service and the nature of the information and may extend beyond the end of your relationship with us but only for so long as it is legally necessary for us to have

sufficient information to respond to any issue that may arise at a later date. When your personal information is no longer needed, we have procedures to destroy, delete, erase or convert it to an anonymous form.

## **How Does Lightyear Protect Personal Information?**

Lightyear stores and process your personal information in Calgary, Alberta and through the offices of its carrying broker, Haywood Securities Inc., in Vancouver, British Columbia, Canada.

We maintain security standards and procedures to help prevent unauthorised access to confidential information about you. Our security standards and procedures are updated and tested from time to time to improve the protection of our information about you and to assure the integrity of our personal information.

We have procedures that limit employee access to personally identifiable information to those employees with a business need to know such information about you. We educate our employees about the importance of confidentiality and customer privacy through standard operating procedures, special training programs, and our internal policies. We take appropriate measures to enforce employee privacy responsibilities.

All our suppliers and agents, as part of their contracts with Lightyear, are bound to maintain your confidentiality and may not use the information for any unauthorised purpose. When we provide information in response to a legal or regulatory inquiry or order, we ensure that the order is valid and we disclose only the information that is required – otherwise we will seek your consent prior to disclosing any information.

## **What about the Internet?**

We share your concern about your privacy in the Internet world and are committed to its protection. The principles set out in this privacy policy apply equally to anything you might do at our website.

When you send us an e-mail or when you ask us to respond to you by e-mail, we learn your exact e-mail address and any information you have included in the e-mail. We use your e-mail address to acknowledge your comments and/or reply to your questions, and we will store your communication and our reply in case we correspond further. We will not sell your e-mail address to anyone outside of Lightyear. We may use your e-mail address to send you information about our products or services that we believe may be of interest to you. If you don't want us to contact you with product information by e-mail, you may tell us so at any time. Remember e-mail over the Internet is generally unencrypted. We recommend that you do not send us sensitive or confidential information by ordinary email, as unencrypted email is generally not secure.

## **How Do I Access My Personal Information**

You may request access to your personal information on record with Lightyear and information about Lightyear's use and disclosure of that information by contacting your investment advisor. We will advise you in advance if a minimal charge will be required for conducting the search, and we will respond to your request promptly but in any case within 30 days. Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to Lightyear, is too costly to retrieve, or cannot be disclosed for other legal reasons. Also, we do not maintain disclosure records for regular or routine actions.

If you have any questions regarding decisions made about you, we will tell you the reasons for those decisions. Where relevant, we will provide you with the name and address of the credit reporting agency from which a report was obtained.

## **How Do I Keep My Personal Information Accurate?**

Lightyear attempts to keep its records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information. If you find any errors in our information

about you, let us know and we will make the corrections immediately and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

## **Who Should I Contact Regarding Privacy Issues**

Lightyear has designated a privacy officer to respond to your concerns or questions about privacy and confidentiality – or any concerns about the way a request for personal information was handled. To reach our privacy officer, please refer to the following:

- *in writing*, at Suite 660, 202-6<sup>th</sup> Avenue SW, Calgary, Alberta, T2R 2R9;
- *by telephone*, at 403-218-1409;
- *by facsimile*, at 403-536-6512; or
- *by e-mail*, at [privacyofficer@lightyearcapital.com](mailto:privacyofficer@lightyearcapital.com).

If your concerns remain unresolved, you can contact Lightyear's Compliance Officer directly in writing, as above.