



**GLOBEVEST  
CAPITAL**

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# Privacy Policy

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## 1 Objective and General Principles

Globevest Capital Ltd (“**Globevest Capital**”, “**us**”, “**our**”, or “**our**”) is committed to protecting the confidentiality and security of your personal information. The purpose of this Privacy Policy (hereinafter referred to as the “**Policy**”) is to establish guidelines governing the management of the personal information we collect, use, or disclose whenever you interact with us, including when you visit our website [www.globevestcapital.com](http://www.globevestcapital.com) (the “**Website**”), when you contact us by telephone, email, or in person, and when you complete our Account Opening Form. This Policy further serves to inform you of how we process and protect your personal information, as well as the rights you may have in respect of your personal information.

## 2 Definition of “Personal Information”

In this Policy, “**personal information**” means any information that relates to and identifies an individual. This may include, for example, your name, contact information, mailing or email address, date of birth or information about your account with us. It may also include other types of technical information collected through your use of our Website, such as your IP address, browser settings and device ID, but only to the extent that such information identifies you. Information that is aggregated or anonymized and that does not identify an individual is not considered to be personal information.

## 3 Collection of Personal Information

We limit the collection of personal information to what is reasonably necessary to provide you with our investment management services.

We generally collect personal information that you provide directly from you, for example when opening an account by way of our Account Opening Form and during meetings held over the course of our business relationship. We may also collect personal information from you through automated means when you interact with us through our online portal.

### **(a) Personal information we collect directly from you**

We collect personal information that you provide us with by filling out our Account Opening Form, Account Update Form, or Management Agreements, and in any other way, such as by email, telephone, or during in-person meetings. Examples of the categories of information collected include the following:

- **Identifiers and contact information**, such as your name, email and mailing address, and phone number.
- **Demographic information**, such as your date of birth, nationality, marital status, and number of dependants.

- **Financial information**, such as your tax identification number, bank account, payment information, the amount of your contributions and experience, your choices, your dealings with Globevest Capital and your investment needs.
- **Identification documents**, which may include personal identifiers on your passport or driver's license.
- **Employment information**, which may include your annual salary and information about your current and previous employer(s).
- **Any other information you provide us with**, such as when you contact us to make an appointment or when you interact with us by email or in person.

**(b) Personal information we obtain from third parties**

In certain circumstances, we may obtain your financial information from your financial institution or securities custodian (e.g., National Bank Independent Network), including when you open an account with them and authorize them to give us access to your account.

**(c) Personal information you provide about third parties**

In certain circumstances, you may provide us with personal information about third parties, such as a spouse, beneficiary, trusted contact, director of a corporation or trustee of a trust, or in other similar circumstances. When this is the case, you must ensure that you have obtained the third-party's consent before providing us with their personal information for these specific purposes.

**(d) Personal information we collect through automated means**

When you log in to our Website, we may collect technical information through electronic means such as cookies. This information may include information about your visit to our Website, including your computer's IP address and the browser used to visit our Website, your operating system, screen resolution, location, browser's language settings, the webpage you last visited, any keywords searched (if you used a search engine), the number of pages viewed, information you entered, etc. This data is used to measure and improve the effectiveness of our Website or to improve the experience of our clients. We treat this information as personal information when it is associated with your account or contact information. Please see [What are your privacy choices?](#) for more information on how to disable certain cookies.

## 4 Use of Personal Information

We use your personal information to provide you with our investment management services, as described in the [Personal Information Collection](#) section above. For example, this includes understanding and assessing your ongoing needs, as well as setting up and administering your account.

We may also use your personal information for the following purposes, or otherwise with your consent, where permitted or required by law:

- **To verify your identity**, in accordance with legal and regulatory requirements (e.g. under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*) when you open an account with us.
- **To manage our business operations**, including managing and facilitating your investment transactions, assessing your needs on a continuous basis, and rebalancing your portfolio as needed.
- **To develop and improve our product offerings and services**, including to respond to any comments or questions you submit to us and to evaluate and improve your general use of the Website.
- **To comply with legal requirements**, including record-keeping, reporting and tax obligations, and any other obligations imposed by the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

## 5 Sharing of Personal Information

Globevest Capital may make your information available to third parties in the circumstances described below, or otherwise with your consent or where permitted or required by law:

- **Service providers.** Globevest Capital may disclose your personal information to service providers who help us achieve the purposes set out in the [Use of Personal Information](#) section above and who need this information in order to provide us with their services. Our service providers include accounting firms, law firms, and information technology and data hosting providers. Our service providers are only authorized to use this information in the course of performing the services they provide to us.
- **Unaffiliated third parties.** In order to complete certain transactions or to make certain changes to your account at your request, Globevest Capital may provide personal information to non-affiliated third parties such as trustees, securities dealers, and custodians (e.g., National Bank Independent Network). Please note that in all cases, the management of our clients' assets is carried out exclusively by Globevest Capital.
- **Commercial transactions.** We may disclose personal information to a third party in connection with a sale or transfer of business or assets, a merger, a reorganization or the financing of certain parts of our business. In the event that the transaction is completed, your personal information will remain protected by applicable privacy laws. If the transaction is not completed, we will ask the other party to refrain from using or disclosing your personal information and to delete the information in its entirety.
- **For purposes of compliance with our legal obligations.** From time to time, Globevest Capital may be required to disclose personal information in response to requirements set out in legislation or regulation, to court orders, to subpoenas, search warrants, government investigations or any other legally valid request or investigation. We may also disclose personal information to law enforcement agencies (e.g., police authorities,

including the Royal Canadian Mounted Police), the Canadian Intelligence and Security Service (“**CSIS**”) or the Financial Transactions and Reports Analysis Center of Canada (“**FINTRAC**”) when we become aware of any activity that we believe to be illegal in the event of an emergency that endangers the life, health or safety of an individual.

Please note that if you want us to share your personal information with a third party, such as your accountant, auditor or consulting firm, we require written instructions describing the personal information you would like us to disclose, as well as the name, address, telephone number, fax number and email address of the third party.

## **6 Personal Information Outside Quebec**

Your personal information may, in some circumstances, be transferred to jurisdictions outside of Quebec. As a result, you understand that your personal information will be subject to the laws of other jurisdictions and may be made available, without notice, to foreign governments, courts, law enforcement and regulatory agencies pursuant to lawful orders and/or laws applicable in those jurisdictions. Regardless of the company or individual that processes your information and where it is processed, we will take steps to protect your information in accordance with applicable data protection laws and this Policy.

## **7 Account Retention and Closure**

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected and for which consent was received, unless required or permitted by law. Once the purpose for which it was collected is achieved, your personal information will be securely destroyed or anonymized (so that the information no longer identifies you).

If you decide to close your account(s), we will comply with this section and destroy or anonymize your personal information, where required by law. Globevest Capital is subject to legal data retention requirement, even after you close your accounts with us.

## **8 What are your Privacy Choices?**

### **(a) *Your choices for using cookies***

As mentioned in the [Collection of Personal Information](#) section, we use cookies to collect certain technical information when you visit our Website. This information does not directly identify you and is used to improve the content of the Website and facilitate access to it.

You can opt out of certain cookies and manage your cookie preferences by enabling the applicable settings in your browser. Most browsers allow you to delete or reject cookies from the websites

you visit. To do this, follow the instructions outlined in your browser settings. However, note that if you do not accept cookies, you may not have access to all the features of the Website or the Website may not function properly.

In particular, we use Google Analytics, which allows us to see information about users' activities, including which pages they visit, and how much time is spent on our Website. This information is de-identified and displayed in numerical format, meaning that it cannot be used to identify users. You can disable the use of Google Analytics by visiting the [Google Analytics opt-out page](#).

**(b) Your right to withdraw your consent**

You may withdraw your consent to the collection, use and disclosure of your personal information at any time, subject to contractual and legal restrictions and reasonable notice. Please note that if you withdraw your consent in respect of certain uses of your personal information, we may no longer be able to provide you with certain services. To withdraw your consent, please contact us as indicated in the [Contact Us](#) section.

## 9 Security and Privacy

Globevest Capital maintains policies and governance practices that ensure the protection of your personal information, as required by applicable law. These policies and practices describe the framework for retention and destruction of personal information, in addition to the roles and responsibilities of our employees throughout the information lifecycle. They also set out a process for handling privacy complaints.

In addition, Globevest Capital takes the necessary steps to protect your personal information from loss, destruction, theft, unauthorized access, access, disclosure, reproduction, sharing, use or alteration, regardless of the form in which it is stored or where it is located. To do this, various security measures have been implemented, including those described below.

### 9.1 Physical Measures

The physical means put in place include the protection of premises, such as secure access and the secure location of equipment.

### 9.2 Administrative Measures

Only Globevest Capital employees who need to consult your personal information in the course of their duties have the necessary access to do so.

### 9.3 Technical Measures

Computer systems that store customers' personal information are protected with passwords, encryption, anti-virus software, and firewalls.

Finally, the passwords, codes or identification numbers used by our customers to access their accounts are confidential. Our clients are the only people who know them.

## 10 Access and Rectification

Globevest Capital is committed to remaining vigilant in respect of the accuracy of your personal information and we accordingly request that you keep us informed as soon as possible of any changes to, for instance, your mailing address, email address or telephone number, employment status or income needs.

You have the right to access your personal information and to request the rectification of information that is inaccurate, incomplete or out of date, subject to the limited exceptions provided by applicable laws. To exercise your rights, please contact us using the information in the [Contact Us](#) section below. Please note that before you are entitled to modify, access or review your personal information, we may ask you to provide us with sufficient identification.

## 11 Policy Review

The Policy will be reviewed periodically to ensure that it remains appropriate at all times in accordance with applicable laws and regulations, technologies, and standards. This Policy may accordingly be amended from time to time. The most recent copy of this updated Policy will be available on our Website, and if the changes are significant, we will provide more visible notice as required by law. This Policy is effective as of the date shown at the top of this page.

## 12 Contact Us

If you have any questions, concerns or complaints regarding this Policy or the collection, use or disclosure of your personal information by Globevest Capital, please contact:

Privacy Officer  
Alexandre Roy, Chief Compliance Officer  
Globevest Capital Ltd.  
1005 Lionel-Daunais, Suite 104  
Boucherville, Quebec J4B 0B1  
Email: [privacy@globevestcapital.com](mailto:privacy@globevestcapital.com)