

Privacy Policy

Last Updated: January 29, 2025

Sagard Wealth earns your trust by adhering to privacy principles in protecting your personal information. “Sagard Wealth” is the business name of Grayhawk Investment Strategies Inc.

This Privacy Policy explains the measures we take to fulfill these commitments.

ABOUT THIS PRIVACY POLICY

This policy applies to Sagard Wealth’s collection, use, storage or disclosure of personal information obtained through:

- Our website located at www.sagard.com/sagard-wealth;
- Our services, programs and offerings;
- Requests for information about our products, services and programs;
- Our recruitment processes; and
- Any other interactions you may have with us (by telephone, email or in person, including through our advisors).

This policy is not intended to cover information other than personal information, such as business or anonymous information.

PERSONAL INFORMATION

The term “personal information” refers to information, whether factual or subjective, that identifies or can be used to identify you.

WHAT PERSONAL INFORMATION DOES SAGARD WEALTHSAGARD WEALTH COLLECT?

The type of information that we collect is based on our relationship with you. We will limit the amount and type of personal information collected to that which is necessary for its purpose. Personal information is primarily collected when you first establish your relationship with Sagard Wealth or as circumstances change over time.

- As a private client, on an individual basis, we may collect the following types of personal information; your first and last name, mailing address, telephone number, email address, date of birth, citizenship, tax identification numbers such as a social insurance number (SIN), government-issued identification, information about your education, credit history and employment, as well as your financial information such as annual income, assets and liabilities, banking information and financial transactions.
 - In some instances, we may collect the personal information of third parties associated with you, such as your spouse or other family members, where such information is required by law or is necessary to provide services to you.
- For business clients or legal entities, we may collect additional information that may include the personal information referred to above for each of officers, directors, beneficial owners, shareholders, trustees, settlors, authorized persons, partners or executors.
- We may also collect information associated with you when you provide us with feedback or request information about our services, products and programs.
- If you apply for a job with us, we may collect the following types of information from you or your past employers: Name, email address, phone number, mailing address, resume, cover letter, credit and criminal history, reference check information, information from interviews, proof of eligibility to work, identification information (e.g., driver’s information), salary, other sensitive and demographic information.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your personal information at the time you become a new Sagard Wealth customer, at the time you acquire additional products and services from us and at other times when we communicate with you to administer your account with us. We may collect your personal information directly from you or from third parties with your consent (if required). We continue to collect and update personal information throughout our relationship with you. For example, we collect your personal information through:

- Our service agreements and written correspondence with you;
- Your discussions with your investment advisors; or
- Your visits to our website. For more information on this, see below under "[Our Website](#)".

OUR WEBSITE

Each time you visit our website pages, we gather the date, time, browser type, name of the visitor's Internet service provider, the site that referred the visitor to us, any pages that are requested, the navigation history and IP address of the visitor. The foregoing information does not generally contain anything that can identify users personally. *If you object to this gathering of information, you should not use or access our website.* We use this information for our internal security audit log, trend analysis and system administration, and to gather broad demographic information about our user base for aggregate use. This information may be shared with third parties in order to provide services to us or to analyze, store or aggregate the information.

Cookies

Our website may employ the use of "cookies". A "cookie" is a small line of data that is sent to your Internet browser from a web server and stored on your computer's hard drive. Cookies can track how and when you use a site, and which site you visited immediately before. A cookie does not damage your system and identifies your browser, not you personally. We use cookies to identify which areas of our network you have visited, so the next time you visit those pages may be readily accessible or to personalize our digital offerings and services for you.

You can manage website cookies in your browser settings, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. Please note that if you disable or delete cookies, the website may not function fully or as intended. Visit the Digital Advertising Alliance of Canada page at <https://youradchoices.ca/en/tools> for more information on how to manage and remove cookies and other targeted advertising.

Our website may use third parties, including Google Analytics, to help us gather and analyze information about the areas visited on the Websites in order to better understand, evaluate and improve the user experience and the convenience of the Websites. You may learn more about Google's practices with Google Analytics by visiting Google's privacy policy at <https://policies.google.com/technologies/partner-sites>. You can view Google's currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.

IDENTIFYING PURPOSES

At the start of our working relationship with you, we will make every attempt to explain why and for what purposes we are collecting your private information before or at the time the information is collected. To protect you, Sagard Wealth will not collect, use, or disclose any personal information in any manner other than which we identify to you when we collect it, unless we are authorized to do so by applicable law. If a new purpose for using your personal information develops, we will inform you of that purpose.

CONSENT

We only collect information by lawful means. As part of using our products, programs and services or interacting with us, we may collect and process some details about you. When we do so, we will collect, use or share your personal information with your consent for the purposes identified or as otherwise permitted or required by law. In compliance with our privacy obligations, we may obtain your permission based on implied consent (including through this privacy policy) or through other means (such as express consent). However, in some situations, the law allows us to collect, use or disclose personal information without your consent.

You may withhold or withdraw your consent for us to collect, use or share your personal information, as long as there are no legal or contractual requirements for us to process your information. Depending on the circumstances, however, withdrawal of your consent may impact our ability to serve you.

WHY WE ASK FOR YOUR PERSONAL INFORMATION?

Sagard Wealth will collect your personal information for a variety of reasons.

- We collect your personal information to establish and maintain our contractual obligations and provide you with the products and services we have agreed to provide you. This includes for billing and collection, and as we believe is necessary or appropriate to protect, enforce or defend the legal rights, privacy, safety or property of the website, our employees or agents, or other users or to comply with law.
- We ask for your personal information to meet our legal and regulatory obligations. To meet our “Know Your Client” obligations under securities regulation, to verify your identity under anti-money laundering regulations and to comply with tax reporting obligations.
- We need to collect personal information to confirm who you are and verify the information you have provided to us, including to protect you and us from error and fraud. We will ask for your name, address, telephone numbers (including mobile), email address, and date of birth, and may ask for other forms of identification such as a valid driver’s license, passport, or a recent utility bill. We will confirm your identification by reviewing your government identification.
- We ask for your financial information to assess your eligibility and suitability for our products and services. We will ask you a series of questions to better understand your financial history, needs, goals, financial position, and family circumstances to ensure that all our investment recommendations are suitable. We will also ask you about the source of your incoming funds or assets and the purpose for investing at Sagard Wealth. To assess your overall financial objectives, we will ask if you have investment accounts held at other financial institutions.
- We need your contact information to communicate with you. We may communicate with you by phone, mail, email, or other electronic means to provide you with information related to your accounts or about new Sagard Wealth products, service offerings, events or general industry information.
- We may need information about your family and related parties. In some circumstances, we may need information about your spouse, legal guardian, children, beneficiaries, or personal representatives.
- We may use your personal information to administer surveys, or request feedback to improve and manage our relationship with you.
- If you have applied for a job with us to facilitate the recruitment process, including assessing you for future positions.
- To research, analyze, develop, manage, protect and improve our business operations, our products and services (including our website), to deliver a more personalized experience and to test new products and service offerings, including:
 - Audit, data analytics and research to help us deliver and improve our digital platforms, content and services; and

- Monitor and analyze trends, usage and activities in connection with our products, programs and services to understand which parts of our services and offerings are of the most interest and to improve the design and content of programs and services.
- Facilitate our business and operational needs.
- As permitted or required by law, or as we may notify you.

SHARING YOUR INFORMATION

We do not sell, trade, or rent our clients' personal information.

Sagard Wealth may share personal information with corporate affiliates and partners and may engage third parties to process personal information on its behalf. These third parties are required to protect the data, and limit use and disclosure of the information for the specific purposes for which we supplied it. For example, Sagard Wealth may share personal information:

- **With third party service providers:** We may use service providers to provide us with various services such as technology, administration, custody, printing, marketing, legal and accounting. As part of providing these services, our suppliers may collect or have access to your personal information. Suppliers of services working along side Sagard Wealth, are required to sign contracts obligating them to protect the privacy and confidentiality of personal information provided to them, to enable them to perform their function.
- **As part of a transaction:** We may be involved, from time to time, in transactions to sell parts of our business or assets or merge with other businesses. Since our customer information may be part of such transactions, we may use or disclose this information to other parties involved in the transaction. In such cases, the information that is shared is limited to what is necessary to accomplish the transaction, and we take appropriate steps to protect the information from improper use or disclosure.
- **To comply with legal obligations:** For example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request. Additionally, we may share personal information with government and regulatory agencies to meet our compliance, regulatory, and risk management obligations or to comply with the law.
- **With our partners and affiliates:** We may share information with our affiliates and business partners to meet our legal and compliance requirements and operational needs. We may also share your information to offer products and services that complement your relationship with Sagard Wealth. Written consent to share your information for the purpose of offering products and services will be requested where the law requires it. You may opt out of sharing your information for the purpose of offering products and services by contacting Sagard Wealth's Privacy Officer at compliance@sagardwealth.com.

DE-IDENTIFIED, AGGREGATED OR ANONYMIZED INFORMATION

We may generate de-identified, aggregated or anonymized information using personal information. Such information does not reveal your identity.

We may use de-identified, aggregated or anonymized information to conduct research, compile aggregate data sets, statistics and reports and to perform analytics about Sagard Wealth's products, programs, services, service standards, business operations, and trends for use by Sagard Wealth, its affiliates and our respective third-party service providers, including to understand how we are performing, or to develop relevant products, services or programs.

Such information may also be shared with third parties for contractually specified reporting and statistical usage purposes and with our service providers, including to create marketing materials, case studies, research publications, and statistical analysis.

SAFEGUARDING YOUR INFORMATION

Personal information is protected by security safeguards that are appropriate to the sensitivity level of the information. Outlined below are some of the various security measures we take to safeguard your personal information in compliance with our privacy obligations:

- We store clients' personal information electronically on enterprise grade computing systems, where only authorized persons have access.
- We have numerous security controls to protect those systems, including but not limited to Multi Factor Authentication, monitoring and anti-virus/malware/ransomware protection.
- We maintain copies of our data at an offsite location for disaster recovery purposes.
- We train our employees to keep client personal information strictly private and confidential. We require all staff to certify that they will follow our policies and procedures, which obliges them to respect and protect clients' personal information. We ensure that departing staff understand they remain contractually obliged to respect the privacy of clients' personal information.
- Appropriate controls are in place over computer systems and these controls are reviewed on an ongoing basis to ensure compliance with Sagard Wealth's security and privacy policies.
- When you open an account at Sagard Wealth, you will also open an account and sign an account agreement with a custodian. The custodian provides safekeeping of your securities as well as trade execution, clearing and other services. We will share personal information with your account custodian. The information we share will ensure that we can provide you with the services and information that you expect from us and that we are required to provide under applicable regulations.
- Additionally, Sagard Wealth aspires to maintain a paperless office and makes every reasonable attempt to secure, store and safeguard all our files, including your personal information, in an electronic environment. In exceptional circumstances, Sagard Wealth will receive, accept, store and safeguard paper documents. Sagard Wealth will convert all paper documents to electronic copies as soon as practicable for longer term secure storage. We shred all paper documents when they are no longer required.

HOW YOU CAN SECURE INFORMATION YOU SHARE WITH US

Sagard Wealth provides all clients with secure online access to exchange personal and financial information relating to you, your services, and your account(s). Your online access to your personal information is protected so that only you can access it. However, you are responsible for ensuring the security of your unique web login ID and password. You must avoid selecting an obvious password, such as a street address, date of birth, or telephone number and to change your password on a regular basis, in order to reduce the potential for unauthorized use. Any web login ID, password, or any other piece of information chosen by you or provided to you as part of Sagard Wealth's security procedures, must be treated as confidential and personal to you, and you must not disclose it to any other person or entity.

Due to cybersecurity risks associated with email communications, Sagard Wealth cannot guarantee the privacy of information of any unencrypted email correspondence you send will be received by us and that the message will remain confidential during transmission. **To ensure the security of your personal information, we ask that you refrain from sending unencrypted personal information via email or any other sensitive information you wish not to be shared without your prior consent.** Sagard Wealth will permit you, if practicable and only in exceptional circumstances, to send scanned documents by email in an encrypted format.

Do not respond to text messages, pop-ups, emails, or other internet requests that ask you to reveal personal information about yourself or your account when using the Services. Sagard Wealth will never send you unsolicited messages or emails asking for your password, credit card, account numbers, etc. Sagard Wealth will never ask you to validate or



restore your account or access to your online account through unsolicited messages or emails.

RETENTION OF YOUR INFORMATION

We only keep your information as long as it is operationally or legally necessary. When we no longer need the information, it is either destroyed or made anonymous.

ACCURACY

Sagard Wealth will keep personal information as accurate, complete, and current as necessary for its purposes. From time to time, we will confirm with you that your personal information is accurate. We will collect most of your information directly from you. We may however, collect additional information from other sources, including, without limitation, credit reporting agencies, other investment dealers or other financial institutions.

HYPERLINKS

Our website and online resources may contain hyperlinks allowing users to visit other sites operated by other companies. Sagard Wealth is not responsible for the privacy practices, business practices or content of any of such websites to which we link. If you access such third-party websites, either directly or via the website, you should review the privacy policy of each site.

ACCESSING AND CORRECTING YOUR INFORMATION

Upon request in writing to compliance@sagardwealth.com, you shall be informed of the existence, use and disclosure of your information and shall be given access to it. You may verify the accuracy and completeness of your information and may request that it be amended if appropriate. Please note that we may not be able to provide you with all the information you request, depending on the circumstances.

CONTACT US

Sagard Wealth's Chief Compliance Officer also acts as our Chief Privacy Officer and is responsible for monitoring the firm's adherence to our Privacy Policy. For further information or to relay questions and concerns on Privacy, please contact Sagard Wealth by emailing us at compliance@sagardwealth.com.

CHANGES TO OUR PRIVACY POLICY

We may modify this notice from time to time and will post the most current version online.