

Greystone Privacy Policy

1. Scope of policy

Protecting your privacy is a top priority for Greystone Managed Investments Inc. and its parent corporation, Greystone Capital Management Inc. (collectively, "Greystone", "we" or "us"). In this Policy, we explain how we collect, use and disclose personal information about our clients and other individuals ("you"), except our employees in their capacity as our employees and not as our clients.

We will handle any personal information you provide to us with care and in accordance with applicable law and this Policy. Our employees are also subject to professional and ethical obligations to maintain confidentiality of all information we receive in the context of conducting our business principally as an institutional investment portfolio management firm.

This Policy does not apply to personal information of Greystone employees collected in the context of their employment relationship with Greystone.

2. Personal information

The term "personal information" refers to information about an identifiable individual or any information that allows an individual to be identified. Examples of personal information include an individual's name, home address, birth date, gender, and financial information. Generally, personal information does not include an individual's name, title, business address or telephone number in that individual's capacity as an employee of an organization.

3. Purposes for which we collect personal information

We will identify the purposes for which we collect, use and disclose personal information at the time of collection, or as otherwise permitted or required by applicable law, including the following format with bullets:

- a) to provide investment portfolio management and fund management services to our clients, including facilitating investment transactions;
- b) to establish and manage client relationships, directly and through your agents/consultants;
- c) to comply with our legal, regulatory, and professional obligations, including compliance, surveillance and reporting activities permitted or required by applicable law;
- d) to respond to inquiries about, and to market, Greystone and its products and services;
- e) to request feedback from our clients on the products or services we provide or are considering providing;
- f) to manage our administrative, management and business processes, directly or through third parties, including: opening, maintaining, administering and servicing your accounts; providing back office administrative services (including clearance and settlement services, distribution of account statements and reports, and record-keeping services); maintaining and enhancing our knowledge management systems and databases; and auditing our business operations;
- g) to distribute invitations to seminars and events, and other communications which we believe may be of interest to clients and others;
- h) to contact and communicate with clients and others for the purpose of conducting market research, and evaluating client service and satisfaction; and
- i) for any other purpose for which we have your consent.

4. Your consent

By providing your personal information to us, you signify your consent to our collection, use and disclosure of your personal information in accordance with this Policy. If you do not consent to the collection, use and disclosure of your personal information in accordance with this Policy, please do not provide any personal information to us, in which case, we may not be able to offer you our services.

Whenever possible, we obtain consent to collect, use and disclose personal information about an individual directly from that individual. However, if you provide personal information concerning another individual to Greystone, you represent that, prior to submitting such information, you have obtained the necessary consent or authority to permit us to collect, use and disclose such personal information for the purposes set out in this Policy, or the collection, use and disclosure is permitted by applicable law.

5. Withdrawal of your consent

Subject to any legal or contractual restrictions, you may, upon reasonable notice, withdraw your consent to Greystone's collection, use and disclosure of your personal information. However, if consent is withdrawn, Greystone may not be able to fulfill the purpose(s) for which the information was collected, or fulfill any obligations it may owe to you in connection with such purposes.

6. Disclosure of personal information

In addition to the purposes stated above, Greystone may disclose personal information to third parties, including:

- a) to a government or regulatory entity that has asserted its lawful authority to obtain the information;
- b) where Greystone has reasonable grounds to believe the information could be useful in the investigation of unlawful activity;
- c) to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information;
- d) to protect Greystone's rights and property;
- e) to protect the personal safety of our employees, clients or others on our property;
- f) if Greystone is involved in a merger or other reorganization, to the resulting organization;
- g) to obtain legal or other professional advice; and
- h) as otherwise required or permitted by applicable law. Greystone does not sell, or exchange for consideration or otherwise, any personal information it holds.

7. We limit collection, use and disclosure

To the extent possible, we only collect personal information that is necessary and appropriate for the identified purposes. We will not use or disclose your personal information for purposes other than those for which it was collected, except with your consent or as permitted or required by applicable law.

8. Storing and securing your personal information

Greystone may store and process your personal information at our offices in Canada, or elsewhere. To help protect the confidentiality of your personal information, we employ security safeguards that are customary in the investment management industry and appropriate to the sensitivity of the information, including physical, organizational and technological measures. Such measures include restricted access to offices, limiting access to information on a "need-to-know" basis, using passwords, training of personnel, and well-defined internal policies and practices.

When we employ third-party providers to store, handle or process personal information on our behalf, we use contractual and other means to provide a comparable level of protection while the information is being stored, handled or processed by such providers.

9. Access to personal information

Greystone's Privacy Officer (who is our General Counsel) is accountable for privacy-related matters at Greystone.

If you wish to access your personal information or would like information about our collection, use or disclosure of that information, please make your request in writing to our Privacy Officer, at the address noted below:

Attention: Privacy Officer
Greystone Managed Investments Inc.
300 – 1230 Blackfoot Drive
Regina, SK, Canada
S4S 7G4

You are entitled to challenge the accuracy and completeness of your personal information with us and, to the extent that you have proven such inaccuracy or incompleteness, you can have it amended as appropriate. Subject to certain exceptions prescribed by law, you will be given reasonable access to your personal information. Examples of such exceptions include information that is prohibitively costly to provide, contains references to other individuals, or cannot be disclosed for legal, security or commercial proprietary reasons.

You can help us maintain the accuracy of your information by notifying us of any changes to your personal information.

If you have any questions about this Policy or wish to make a complaint about how we handle personal information, we invite you to communicate with our Privacy Officer in writing.