

PRIVACY POLICY

At Granite Family Office Inc. ("**Granite**"), we are committed to protecting the privacy of our clients and the confidentiality of the personal information in our possession. This policy explains the steps we take to meet these commitments.

In accordance with applicable laws, you will find in this policy information relating to the different contexts in which Granite may collect, use, or disclose your personal information as well as the rights you may exercise in relation to them. Please know that in all cases, protecting the information you entrust to us remains a top priority.

Please do not hesitate to contact us if, after reading this Privacy Policy, any of your questions remain unanswered.

Who are we?

Granite Family Office Inc. is a portfolio management firm registered with the Autorité des marchés financiers ("AMF") in Québec.

Granite must collect personal information from its clients in order to properly fulfill its legal and fiduciary obligations. Understanding your needs, goals, and financial and family situation allows us to ensure that the investments we recommend are appropriate for you. This is both a regulatory requirement and a good way of doing business.

Your consent

When you sign an agreement with Granite and complete our forms and those of your custodian, you consent to the provision of this information.

If you provide us with information regarding your family members, you are responsible for obtaining their consent.

You may withdraw this consent at any time but this may result in Granite no longer being able to provide services to you.

What personal information do we collect?

In the "New Account Opening Information Form" and during our discussions with you, we request the information necessary to fulfill our contractual, regulatory and tax obligations and requirements. The personal information required is: your name, address, telephone and fax numbers, email address, date of birth, social insurance number, details of your investment accounts including securities held and their value, occupation, the source of funds, your income and income requirement, tax jurisdiction, whether you are an insider of a public company, your investment knowledge, risk profile, investment objectives, your spouse's name and occupation, and in certain cases the names and ages of your children and other dependents. It is your responsibility to update us on any changes to this information. We will formally request that this information be updated annually.



How do we collect personal information from?

We collect your personal information primarily from you and your family members, through the completion of our various forms as well as the forms required by your custodian. Generally these forms are completed and signed in person but additional information may be collected during our phone calls with you as well as from information you provide us either by email, fax, mail or when we meet. We may also collect your personal information from others, such as your custodian, any other advisors you may have consented to share your information, such as your accountant or lawyer. We may also collect information which is publicly available, such as government registries and websites.

Why do we keep this personal information?

We have a regulatory requirement to keep and regularly update your personal information, as well as to verify your identity and tax jurisdiction, in order to best respect the investment mandate you have confided to us. We are also required to keep this information in order to prevent fraud.

Who do we share your personal information with?

We disclose your personal information to your custodian as well as to government authorities, tax and law enforcement agencies when required by applicable law, by court order, or by fraud prevention.

We may also disclose your personal information when using the service of various external suppliers such as those with whom we contract portfolio management and trading systems, those who safeguard our servers and email as well as other technology, insurance, administration, printing, marketing, tax, legal and accounting services. While Granite is located in Québec, some of our service providers may be located outside of the province or country, in which case different laws and regulations governing the protection of your information may apply.

Where do we store customers' personal information?

We store your personal information on servers to which only authorized persons have access, and only by means of a password. Only employees who require access to a customer's personal information are authorized to access it. We have equipped ourselves with security hardware and software to keep our servers contamination-free and as secure as possible. We also maintain a copy of our customer files in the cloud for business continuity purposes in the event of a disaster. This data is password-protected. We also keep hard copies of our customers' personal information in filing cabinets. We keep the computers and filing cabinets in which this information is stored on premises that remain locked when employees leave the premises.

How long do we store personal information?

We store personal information for the entire duration of the client relationship. Unless required to store the information longer for regulatory or legal reasons, we will generally destroy the personal information seven (7) years after a client relationship is terminated.

What are your rights?

You may write to our Privacy Officer at compliance@granitemfo.com or by mail at the below address. The Privacy Officer may ask for proof of identity before proceeding.

In Québec, clients have the following rights:

Access, suppression and correction	Withdrawal of consent
You may access the personal information that Granite stores on your behalf and, if needed request that the information be modified or corrected. You may also request that certain information be suppressed if obsolete or inappropriate.	You may withdraw your consent to the use and communication of your personal information. Note that Granite may not be permitted to continue to provide you with many or all of its services.

For more information about your rights and Canadian and Québec laws respecting personal information, please consult the following links for [For individuals - Office of the Privacy Commissioner of Canada](#) or [English - Commission d'accès à l'information du Québec \(gouv.qc.ca\)](#)

How to contact us?

Granite's Chief Compliance Officer has been named its Privacy Office and is responsible for the application of this Privacy Policy. He or she will respond to your questions and requests and will treat any complaints which you may have regarding its practices with respect to personal information.

compliance@granitemfo.com

1100 - 1 Westmount Square, Westmount, Quebec H3Z 2P9

This Privacy Policy may be modified or updated at any time. Regular updates will be posted to our website and client portal. In the event of a material change, we will email or mail the new policy to each existing client.