

PRIVACY POLICY

At Granite Family Office Inc. ("Granite"), we are committed to protecting the privacy of our clients and safeguarding the personal information entrusted to us. Protecting confidentiality and maintaining the security of personal information are fundamental to the services we provide.

This Privacy Policy describes how Granite collects, uses, stores, discloses, and protects personal information in the course of providing its services. It also outlines the rights individuals may exercise regarding their personal information and explains how to contact us with any questions, concerns, or requests.

Granite is committed to complying with applicable Canadian and Québec privacy legislation, including Québec's *Act Respecting the Protection of Personal Information in the Private Sector*.

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 provides investment management and family office services to individuals, families, trusts, corporations, and other entities. In order to properly fulfill our legal, regulatory, fiduciary, and contractual obligations, we must collect and maintain certain personal information regarding our clients and, in certain circumstances, their family members and related parties.

Understanding your financial circumstances, objectives, family situation, risk tolerance, and investment needs enables us to provide appropriate advice and services. This is both a regulatory requirement and an essential component of prudent wealth management.

Your consent

By establishing a relationship with Granite, signing account documentation, completing forms, including those of your custodians, or otherwise providing personal information to us, you consent to the collection, use, disclosure, and retention of your personal information as described in this Privacy Policy.

Where you provide us with personal information regarding trusted contacts, family members, beneficiaries, trustees, corporate representatives, or other individuals, you are responsible for ensuring that you have obtained any necessary consent to share such information with Granite.

You may withdraw your consent to the collection, use, or disclosure of personal information at any time, subject to legal, regulatory, contractual, or operational restrictions. Please note that withdrawing consent may limit our ability to continue providing some or all services to you.

What personal information do we collect?

Through our account opening documents discussions, ongoing client reviews, updates and communication, Granite may collect personal information necessary to provide services and comply with applicable laws and regulations.

Depending on the nature of the relationship, personal information collected may include:

- Name, address, telephone number, email address, and other contact information;
- Date of birth, citizenship, tax residency, social insurance number, and other identification information;
- Employment information, occupation, industry, and source of wealth or source of funds;
- Financial information, including assets, liabilities, income, net worth, banking information, account holdings, investment history, and transaction information;
- Investment objectives, risk tolerance, investment knowledge, liquidity requirements, and other suitability-related information;
- Information regarding spouses, dependents, beneficiaries, trustees, attorneys, or other related individuals where required for the provision of services;
- Information required to satisfy anti-money laundering, know-your-client, tax reporting, and regulatory obligations;
- Records of communications and interactions with Granite, including meetings, telephone calls, emails, electronic communications, and instructions.

It is your responsibility to notify Granite of any material changes to your personal information.

We will periodically request updates to ensure our records remain accurate and complete.

How do we collect personal information from?

We collect personal information primarily from you through meetings, interviews, account opening documents, questionnaires, correspondence, electronic communications, and ongoing interactions.

We may also collect personal information from:

- Custodians, financial institutions, and investment service providers;
- Professional advisors such as accountants, lawyers, tax specialists, or consultants, where authorized;

- Government agencies, regulatory bodies, and publicly available registries;
- Credit bureaus, identity verification services, and anti-fraud service providers where required by law;
- Other sources that you have authorized us to consult or communicate with in connection with the services we provide.

Information may be collected in person, by telephone, electronically, through secure client portals, by mail, or through other approved communication methods.

Why do we keep this personal information?

Granite collects and maintains personal information in order to:

- Provide investment management and family office services;
- Understand client circumstances and assess suitability;
- Comply with securities, tax, anti-money laundering, and other regulatory requirements;
- Verify identity and prevent fraud, financial crime, and unauthorized activity;
- Communicate with clients and authorized representatives;
- Maintain accurate records and fulfill contractual obligations;
- Protect the interests of clients and Granite.

We only collect and retain personal information that is reasonably necessary for these purposes.

Who do we share your personal information with?

Granite may disclose personal information where necessary to provide services, comply with legal obligations, or protect legitimate business interests.

Personal information may be disclosed to:

- Custodians, brokers, financial institutions and fund managers.
- Service providers involved in maintaining or validating Granite data such as portfolio management, trading and compliance systems.
- Regulatory authorities, government agencies, tax authorities, law enforcement agencies, self-regulatory organizations, or courts where required by law;
- Professional advisors, including legal, accounting, compliance, tax, audit, and consulting professionals;
- Technology, cloud storage, cybersecurity, communication, administration, printing, and document management service providers that support Granite's operations.

Granite requires service providers that process personal information on its behalf to maintain appropriate confidentiality and security safeguards.

Certain service providers may be located outside Québec or Canada. In such circumstances, personal information may be subject to the laws of the jurisdiction in which it is processed or stored. Granite undertakes reasonable measures to assess privacy risks and implement appropriate safeguards.

Where do we store customers' personal information?

Personal information may be stored in secure electronic systems, encrypted storage environments, cloud-based platforms, backup systems, and physical records.

Granite maintains physical, administrative, and technological safeguards designed to protect personal information against unauthorized access, use, disclosure, modification, loss, theft, or destruction.

Security measures may include:

- Access controls based on business need;
- Password protection and multi-factor authentication;
- Encryption where appropriate;
- Cybersecurity monitoring and endpoint protection;
- Secure backup and disaster recovery procedures;
- Employee confidentiality obligations and privacy training;
- Physical security measures for offices, devices, and records.

Access to personal information is restricted to authorized personnel and service providers who require such access to perform their duties.

How long do we store personal information?

Granite retains personal information for the duration of the client relationship and thereafter for as long as required to satisfy legal, regulatory, tax, audit, business continuity, or operational requirements.

Unless a longer retention period is required by law, Granite generally retains personal information for a minimum of seven (7) years following the termination of the client relationship.

Once retention requirements have been satisfied, personal information will be securely destroyed, anonymized, or otherwise disposed of in accordance with Granite's records retention procedures.

Security Incidents and Privacy Breaches

Granite maintains procedures designed to identify, assess, document, and respond to privacy incidents involving personal information.

Where required by applicable law, Granite will notify affected individuals and regulatory authorities of confidentiality incidents presenting a risk of serious harm. Granite maintains records of such incidents in accordance with applicable legal requirements.

What are your rights?

You may contact Granite's Privacy Officer using the contact information provided below to exercise your privacy rights or to obtain additional information regarding our privacy practices.

Proof of identity may be required before processing a request.

In Québec, individuals may have the following rights:

Access, suppression and correction	Withdrawal of consent
You may request access to the personal information that Granite maintains about you. You may request the correction of inaccurate, incomplete, or outdated information and, where permitted by law, request the deletion or anonymization of certain personal information.	You may withdraw consent to the collection, use, or disclosure of personal information, subject to legal, regulatory, and contractual limitations. Note that Granite may may be unable to continue providing some or all services if consent is withdrawn.

Additional rights

Subject to applicable legislation, individuals may also have the right to:

- Request information regarding the processing of personal information;
- Request information regarding the disclosure or transfer of personal information outside Québec;
- Request information in a structured technological format where required by law;
- Submit complaints regarding Granite's privacy practices.

For additional information regarding privacy rights, please consult:

[The Personal Information Protection and Electronic Documents Act \(PIPEDA\) - Office of the Privacy Commissioner of Canada](#)

[English | Commission d'accès à l'information du Québec](#)

How to contact us?

Granite's Chief Compliance Officer serves as the firm's Privacy Officer and is responsible for overseeing compliance with applicable privacy legislation and the administration of this Privacy Policy.

The Privacy Officer is available to respond to questions, access requests, correction requests, complaints, and concerns relating to the collection, use, disclosure, retention, or protection of personal information.

Email: compliance@granitemfo.com

Mailing Address:

Granite Family Office Inc.
1100-1 Westmount Square
Westmount, Québec H3Z 2P9

Changes to this Privacy Policy

This Privacy Policy may be amended from time to time to reflect changes in legal requirements, regulatory guidance, technology, business practices, or services offered by Granite.

The most current version will be made available through Granite's website and other appropriate communication channels. Material changes may be communicated directly to clients where appropriate.