

CI Financial Corp. Privacy Office  
Canadian  
Standard Privacy Notice

## USE OF PERSONAL INFORMATION NOTICE

### CI Investment Services Inc.'s Privacy Notice

CI Investment Services Inc. also doing business under the registered trade name of CI Direct Trading (“CIIS”, “we”, “our”, “us”) are committed to respecting and protecting the privacy and confidentiality of the information you have entrusted with us. This Privacy Notice outlines how we collect, use, disclose, store and safeguard your personal information.

### WHAT INFORMATION DO WE COLLECT?

We collect information, including sensitive personal information, such as social insurance number, required to establish and service your accounts in compliance with federal and provincial laws well as our financial self-regulatory organization requirements. We maintain audio recordings of in-coming and out-going telephone calls. You may access our full Privacy Policy Notice online at <https://www.cifinancial.com/ci-is/ca/en/privacy.html>. If you choose to interact with us online via our web portal or through e-mail, we will monitor and record your usage information (please see our Online and Mobile Privacy Policy at <https://www.cifinancial.com/ci-is/ca/en/privacy.html#Online-and-Mobile-Privacy-Policy>

### HOW DO WE COLLECT INFORMATION

We collect information directly from you or from your authorized representative(s), such as your financial advisor or their dealership. Depending on how you choose to do business with us, this information may be collected on applications, forms, over the phone, in person, through the internet, through your mobile device or through other forms of communication. We also collect information about you indirectly where permitted by law. We limit the collection of information to what is necessary to fulfill the purpose for which the information is collected.

### HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT?

In addition to the purposes set out in our full Privacy Policy Notice <https://www.cifinancial.com/ci-is/ca/en/privacy.html>, we may use your information to:

- I. Provide and manage products and services you have requested, including to;
  - a) Open and operate your account,
  - b) Verify your identity,
  - c) Execute your transactions,
  - d) Record and report account status back to you,
  - e) Provide personalized service and support, and
  - f) Respond to any request or questions you may have.
  
- II. Understand our customers and to develop and tailor our products and services by performing data analytics to:
  - a) Determine suitability of products and services for you,

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- b) Determine your eligibility for certain of our products and services, or products or services of others,
- c) Communicate with you about products and services that may be of interest,
- d) Provide you with quality individualized client service and support, and
- e) Market and advertise to clients and prospective clients.

III. Legal and Regulatory Obligations

- a) Provide all required tax reporting,
- b) Comply with legal, regulatory, and contractual requirements, or as otherwise permitted by law,
- c) Fulfill obligations under federal anti-money laundering and suppression of terrorism legislation,
- d) Meet obligations as a member of various financial self-regulatory organizations,
- e) Protect our interests, including recovering any debts you may owe us, and
- f) Protect against fraud and other crime and to manage risk, including conducting investigations and proactive crime prevention measures.

We do not sell or rent client lists or personal information to third parties.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

Employees or authorized representatives of CI Investment Services Inc. or “CIIS”, who will be responsible for functions relevant to the purposes identified above, and other persons authorized by you or by law, will have access to the personal information contained in your file. We share your personal information with CI Financial company affiliates, such as but not limited to CI Global Asset Management (“CIGAM”), CI Assante Wealth Management (“CIAWM”), CI Private Wealth (“CIPC”), CI Direct Investing (“CIDI”) and their subsidiaries where necessary to administer and service your account.

We provide your information to third parties, including:

- Third party service providers for the servicing purposes described above – We do not authorize our service providers to use or disclose the personal information for their own marketing or other purposes. We engage service providers pursuant to a written agreement which requires them to protect personal information with equivalent safeguards that we would use. Our service providers may be located in Canada or other jurisdictions or countries and may disclose information in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those jurisdictions or countries in accordance with the applicable law in that jurisdiction or country. For more information on our information sharing practices, please contact our Privacy Officer.
- To governments, government agencies, regulators, including self-regulatory authorities, when required or permitted to do so by law, including in response to a search warrant, court order, or other demand or inquiry which we believe to be valid.
- To your financial advisor and their dealership where necessary to administer and service your account or if you have provided authorization for them to provide you additional services.
- To your legal representatives and/or with other third parties at your direction for the purposes which you specify at the time of the direction.
- To financial institutions, securities dealers and mutual fund companies where necessary to administer and service your account.

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- To protect our interests, we may disclose information to any person or organization, including an investigative body, in order to prevent, detect or suppress, financial abuse, fraud, criminal activity, protect our assets and interests, or manage or settle any actual or potential loss or in the case of a breach of agreement or contravention of law.
- We may also disclose information to help us collect a debt owed to us.
- In the event of a transfer of a business, we may buy or sell a business (or evaluate those transactions) which would result in certain personal information forming business assets that would be purchased or sold as part of a transfer.
- We may transfer personal information as part of a corporate reorganization or other change in corporate control.
- In other situations where we have your consent, for instance, sharing your information with a joint account holder.

Information collected will be communicated outside of Quebec, both within Canada and other jurisdictions or countries and we may disclose information in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those jurisdictions or countries in accordance with the applicable law in that jurisdiction or country.

### PROTECTING INFORMATION

We maintain appropriate physical, electronic, technological, procedural, and organizational safeguards to protect against unauthorized access, disclosure, copying, use or modification, theft, misuse, or loss of your personal information in our custody or control. These safeguards are appropriate to the sensitivity of the information, the purposes for which it is used, the quantity and distribution of the personal information and the medium on which we (or our service providers) store it. We limit access to your personal information to the employees and agents who require it for the purposes of their role. Your personal information is only used for the purposes for which it was collected or where permitted by law. We store personal information for as long as is necessary to achieve the purposes for which it was collected or in accordance with applicable law.

### ACCESSING OR CORRECTING INFORMATION

We are committed to being transparent and providing you with choices about how your information is used. You may inform us of your preferences by registering for our client web portal CI Direct Investing shared dashboard online at <https://www.cifinancial.com/ci-di/ca/en/dashboard/get-started.html> and accessing the Privacy Preferences page. If you are unable to register online, you may also contact our client services via phone at 1-877-310-1088 or by e-mail to [newaccount@cidirecttrading.com](mailto:newaccount@cidirecttrading.com).

To correct or access your information, we encourage you to contact our Client Services department, access our Online web portal or consult your periodic statements. However, you do have the right to access and correct your personal information, or to find out to whom we have disclosed it. To make a formal request for access or correction, please send a written request addressed to the Privacy Officer, 15 York Street, 4th Floor, Toronto, ON, M5J 0A3. Please include your full name, address, telephone number, and account number(s) on all correspondence to us and provide enough detail to allow us to identify the information you want to access or correct.



15 York Street, 2nd Floor Toronto, ON M5J 0A3 Canada Phone: 1.877.310.1088 Fax: 416.288.8611

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REVOKING CONSENT

You may withdraw your consent for the collection, use and disclosure of your personal information at any time by forwarding a written request to the Privacy Officer. Please include your full name, address, telephone number and account number(s) on any correspondence to us. However, there are certain times when you may not withhold or revoke your consent including certain legal, regulatory, or contractual requirements. We must receive reasonable notice of your request in order to honour your consent withdrawal. Your decision to withhold or revoke your consent may limit the products and services that we may provide to you and may require you to close your accounts with us.

Our Privacy Office

If you have any questions or concerns about our privacy practices, the privacy of your personal information, or you want to change your privacy preferences, please contact our Privacy Officer. For changes to your privacy preferences please be reminded that you may update your selection by accessing the Privacy Preferences page of our web portal. We are committed to helping resolve your questions or concerns.

CI Investment Service Inc. Privacy Officer, 15 York Street, 4th Floor, Toronto, ON, M5J 0A3

Last Updated: May 4, 2023

I/we, the undersigned, acknowledge that I/we have read and understand the following.

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Date (DD/MM/YYYY)

\_\_\_\_\_  
Joint Applicant Signature (if applicable)

\_\_\_\_\_  
Date (DD/MM/YYYY)