

POLICY # : LEG-02	SECTOR: LEGAL
-------------------	---------------

**PERSONAL INFORMATION PROTECTION POLICY -
CLIENTS**

BLUE BRIDGE WEALTH MANAGEMENT INC.



LAST UPDATE: 29.01.2018

PREPARED BY : Original version by Manon Berney (translated by Ninon Daltin)	INITIALS :	DATE : 16.11.2016
RESPONSIBLE : Legal Affairs	INITIALS :	DATE : 30.01.2018
APPROVED BY : Comex	INITIALS :	DATE : 30.01.2018

TABLE OF CONTENTS

1	PURPOSE OF THE POLICY	3
2	CONSENT	3
3	PERSONAL INFORMATION OBTAINED BY BLUE BRIDGE	3
4	BLUE BRIDGE PERSONAL INFORMATION COLLECTING METHOD.....	4
5	USE OF PERSONAL INFORMATION	4
6	DISCLOSURE OF PERSONAL INFORMATION	4
7	RETENTION OF PERSONAL INFORMATION	5
8	PROTECTION OF PERSONAL INFORMATION	5
9	INTERNATIONAL COMMUNICATIONS	5
10	PERSONAL INFORMATION ACCESS AND CONTACT PERSON.....	5
11	AMENDMENT TO THE POLICY.....	6
12	INFORMATION UPDATES	6
13	POLICY UPDATE.....	6
14	EXAMINATION GRID (biennial review)	7

Blue Bridge Wealth Management Inc. ("**Blue Bridge**") reserves the right to modify this policy (hereinafter the "**Policy**") in order to respond as best as possible to its changing needs.

Please note that the masculine includes the feminine; it is used to lighten reading.

1 PURPOSE OF THE POLICY

Blue Bridge Wealth Management Inc. ("**Blue Bridge**") prioritizes the protection of personal information of its clients, whether former, present or prospective (the "**Clients**"). Accordingly, Blue Bridge wishes to ensure that such personal information remains accurate, secure and confidential, pursuant to best practices and the laws of Canada. The Policy describes Blue Bridge's methods for collecting, processing, using, retaining and sharing personal information in its possession.

2 CONSENT

As specified in the Services Agreement, the Clients acknowledge that from time-to-time Blue Bridge collects personal information relating to the Clients in connection with the provision of services by, and compliance with regulatory obligations applicable to, Blue Bridge. As such, the Clients acknowledge that they have read the Policy, the latter being available either by consulting the Blue Bridge website, electronic receipt or hand delivery. In providing Blue Bridge with personal information, the Clients consent to the sharing and use of such information by Blue Bridge's affiliates (collectively, the "**Blue Bridge Group**") which affiliates are equally bound by the present Policy. The Clients acknowledge that such information may be transferred out of the territory where originally obtained.

In particular, the Clients authorize Blue Bridge to collect, use and share personal information, provided that it is (i) for the sole purpose of facilitating the relationship between the Clients and Blue Bridge, the performance of the agreed services and the conduct of Blue Bridge's business; (ii) is managed in accordance with the present Policy, and (iii) is permissible under applicable law.

A Privacy Officer appointed by Blue Bridge is responsible for the implementation of this Policy. Any questions about this Policy, to access personal information, or to change or withdraw any consent to the use or disclosure of personal information, should be directed to the Privacy Officer at: avis@bluebridge.ca.

Blue Bridge will refrain from using personal information for any purposes other than originally agreed unless specifically authorized to do so by the Client to whom such information pertains.

Finally, the Clients may withdraw their consent to this Policy at any time, subject to legal or contractual restrictions and reasonable notice. However, in the absence of consent, Blue Bridge may no longer be able to provide or continue to provide certain services or information useful to you. When providing Blue Bridge or its contractors with personal information regarding another individual, the Clients warrant that they are or have been authorized to do so, *i.e.*, that all necessary authorisations have been validly obtained to enable Blue Bridge to legally collect, use and share such personal information for purposes described in this Policy.

3 PERSONAL INFORMATION OBTAINED BY BLUE BRIDGE

Personal information is obtained for the purpose of providing wealth management, consulting services or such other services for Clients have retained Blue Bridge. Such personal information comprises, among other things, name, personal or professional address, personal or professional phone number, personal or professional electronic address, financial information, invoicing, account information and such other information as is necessary for Blue Bridge to provide the agreed upon

BLUE BRIDGE WEALTH MANAGEMENT INC.

services and to manage the Clients' accounts and business relationships in accordance with legal and regulatory requirements. Blue Bridge also collects personal information for distribution its newsletter communication, general communications and invitations related to its activities.

Further to the information provided voluntarily, Blue Bridge may collect domain names IP addresses from visitors to its website, server usage statistics (e.g., the identity of web browsers and operating systems used) and produce browser histories. Blue Bridge uses such information for the conduct of its business, promotion of its services and website management.

Finally, Blue Bridge complies with the *Canada's Anti-Spam Legislation*.

4 BLUE BRIDGE PERSONAL INFORMATION COLLECTING METHOD

Blue Bridge obtains personal information with consent and complies with Canadian legal requirements. As far as possible, the personal information is collected directly from the Clients or from individuals specifically designated by the Clients. However, Blue Bridge may, with the Client's express consent, also collect information about the Clients from other sources, such as financial institutions, insurance companies, government agencies or records, accountants or other professionals and credit agencies,.

Apart from the collecting methods described here above, Blue Bridge may also collect information related to cookies or similar technologies, specifically from visitors to Blue Bridge's website. Cookies are files that store information on a hard drive or client browser. It allows a website to identify a computer and, after an initial visit, to recognize said computer. Such methods yield various types of information, including web pages visited and emails opened. However, cookies do not store personal information and cannot identify individuals. Non-personal information may be collected, such as frequency of visits to the Blue Bridge website and browsing habits, which information may be used to enhance Blue Bridge's website.

Unless the browser is configured to block cookies, the system will save cookies on the Clients' computers when visiting Blue Bridge's website. By visiting the website, the Clients agree to the use of cookies unless blocked by configuration.

5 USE OF PERSONAL INFORMATION

Blue Bridge may use personal information to provide the agreed services, to manage the Client's accounts, to comply with its legal and business obligations (including Client identification and verification rules and other legal requirements), to manage its business including compliance with contractual obligations and the audit of its operations, to detect and prevent negligence, fraud and theft, to provide personalized content, to handle and respond to inquiries, to provide information about special events and services offered, distribute a newsletter and for general communication purposes.

6 DISCLOSURE OF PERSONAL INFORMATION

Blue Bridge may disclose the Clients' personal information to a third parties only for purposes related to the provision of services or with the express consent of the Clients or as required or permitted by law. In addition, such information may be disclosed for the purpose of outsourcing one or more of the services described in the preceding section, confirming or updating information previously provided by Clients, advising as to events or services or other important information, or other purposes, provided that Blue Bridge will disclose said purpose not later than the time the information is obtained. Blue Bridge will also share this information where required by law.

7 RETENTION OF PERSONAL INFORMATION

The personal information referred to herein is stored in secure locations and on servers monitored at Blue Bridge's premises in Montreal or in Lausanne, or at the service providers' premises.

The personal information referred to herein shall be retained for the entire contractual relationships between the Clients and Blue Bridge and thereafter for at least as long as required by law, depending on the nature of the information.

8 PROTECTION OF PERSONAL INFORMATION

In order to protect access and ensure confidentiality, Blue Bridge uses administrative and technological security measures appropriate to the sensitivity of the personal information.

Blue Bridge has policies and procedures in place to protect personal information from loss, unauthorized access, modification or communication. In addition, its premises are secure and Blue Bridge has implemented technological protection measures, such as security software, passwords and firewalls to prevent unauthorized access to its computers. Blue Bridge uses industry-standard networking technologies and password protection systems and works closely with IT security partners to ensure compliance and anticipate the evolution of invasive technologies.

Blue Bridge takes all reasonable steps to ensure that personal information is treated in a safe manner and in accordance with this Policy. However, despite the implementation of these measures, there is no mode of transmission or retention of information that is fully assured. In particular, Blue Bridge cannot offer any guarantee with respect to the integrity or security of electronic communications and the Clients consent to the reception of unencrypted electronic communications from Blue Bridge.

9 INTERNATIONAL COMMUNICATIONS

In some situations data, other than sensitive information, may transit through external servers outside Canada. For technological reasons beyond Blue Bridge's control, personal information may transit through external servers when sent by email.

Personal information may be transferred and stored outside Canada. Such information may also be accessed by employees, service providers, or partners. The aforementioned personnel assist in the management of Client relationships, providing information about Blue Bridge products and services in response to requests therefor or to their consent to receive communications, the processing of Clients' orders, processing of information concerning payments. In submitting personal information, Clients consent to such transfer, storage and processing.

10 PERSONAL INFORMATION ACCESS AND CONTACT PERSON

Blue Bridge, subject to certain exceptions, may disclose to its Clients personal information obtained, the use made of it and the whether it has been disclosed to third parties.

Blue Bridge has designated a Privacy Officer responsible for the implementation of this Policy. For any questions about this Policy, to access personal information, or to change or withdraw any consent to the use or disclosure of personal information, please contact the Privacy Officer at: avis@bluebridge.ca.

Upon receipt of a written request directed to the Privacy Officer, Blue Bridge will acknowledge receipt and may seek to confirm the Client's identity before providing information. As a rule, access to information will be provided free of charge. However, where the application requires a copy or

transmission of documents, Blue Bridge may charge a reasonable fee by notifying the amount in advance, advise as to the amount of the fee and provide an opportunity to withdraw the request. Blue Bridge will provide access to information within 30 days of receipt of the request or provide written notice that additional time is required to respond to the request.

In the event that Blue Bridge is unable to provide access to Clients information or is not permitted to do so by law, Blue Bridge will provide an explanation and suggest other available alternatives.

11 AMENDMENT TO THE POLICY

Blue Bridge reserves its right to modify or amend the present Policy. Any changes to the Policy will be made available on Blue Bridge's website and will be available upon request made to Blue Bridge's Privacy Officer.

Notwithstanding changes to the Policy, Blue Bridge will restrict its use of personal information as circumscribed by the Policy in effect at the time the personal information was provided or as required or otherwise permitted by law, unless the Client expressly consents to be bound by the revised Policy.

12 INFORMATION UPDATES

In the event that the personal information provided is changed, Clients should advise Blue Bridge by contacting the Privacy Officer at: avis@bluebridge.ca or inform their contact person at Blue Bridge.

13 POLICY UPDATE

The Policy will be reviewed biennially to ensure compliance with regulations and that it is continually exercised in the best interests of the Clients.

14 EXAMINATION GRID (biennial review)

	<i>Control</i>	<i>Comments</i>	<i>Compliant</i>	<i>Not compliant</i>	<i>Not applicable</i>	<i>Attached support document</i>
1	Is the Policy available on Blue Bridge website?					
2	Is the Policy on the website up to date?					
3	Is the email address avis@bluebridge.ca permits to contact the Privacy Officer?					
4	Have there been requests for access to personal information from Clients for the reporting period?					
5	Have there been any requests for access to personal information made by regulatory authorities for the reporting period?					