

Privacy Policy

At Sarbit Asset Management Inc. ("SAMI") we take the issue of privacy seriously. We are committed to providing investors with excellent service while respecting the privacy of personal information. Each SAMI employee is responsible for ensuring the confidentiality of all personal information they may access.

Personal Information

Personal information is information that identifies an individual. It includes information such as age, marital status, social insurance number, home address and telephone number.

How do we use personal information?

Obtaining personal information allows us to:

- Establish the identity of investors;
- Ensure our records are accurate;
- Establish and administer accounts;
- Execute transactions;
- Maintain account holdings and transaction records;
- Verify information previously given;
- Provide investors and their investment advisers account information and statements;
- Provide investors with financial statements, tax receipts, transaction confirmations, proxy mailing and other information that may be required to service accounts;
- Provide customer service; and
- Meet legal and regulatory requirements.

How do we obtain personal information?

In order to ensure that your investment in a SAMI product is administered efficiently we will collect personal information from you or from your dealer. We may collect the information in various ways, including electronic transfers and telephone calls, and may retain copies of documents, or recordings of telephone calls that contain personal information.

Who do we disclose personal information to?

In order to provide the best possible client service, we may be required to disclose personal information to third parties in the normal course of business. These third parties include:

- Your investment advisor;
- Other financial institutions, securities dealers, and mutual fund companies, for example, when you move your investments from one firm to another;
- Other affiliates;
- Contracted third-party service providers;
- Canadian government, government agencies and regulators; and
- Any other entity as required by law.

SAMI may be required to provide personal information in response to a search warrant, court order or other legally valid request.

Obtaining Consent

When you complete an investment application you provide us with personal information. By signing an application form you are consenting to the use of your personal information. By continuing to do business with us, you are consenting to the use of your personal information, as described under the heading "Who do we disclose personal information to?".

How can you withdraw your consent?

You may withdraw your consent to SAMI's use of your information by contacting us. In some circumstances, legal requirements may prevent you from withholding consent. The decision to withhold information may also limit the products or services we are able to provide.

How can you access your personal information?

Upon written request SAMI will provide you with access to your personal information. Please note that we may not be able to provide you with your information in certain circumstances. For example: information containing references to other persons; information containing proprietary information confidential to SAMI, or information cannot be disclosed for legal reasons.

How can you ensure your information is accurate?

The accuracy of your personal information is essential to providing you with excellent service. If you wish to change or update your personal information, please contact us. Please inform us of any errors regarding your personal information right away, so that we may correct our records.

Where is your personal information kept?

Your personal information may be kept in electronic or paper format in our offices or the offices of our registrar and transfer agent, International Financial Data Services (Canada) Limited. Your information may also be kept in secure off-site storage facilities.

How do we protect your personal information?

Policies, procedures and safeguards have been put in place at SAMI to ensure your personal information is protected. Our employees and service providers have access to your personal information to enable them to provide necessary services to you. Any personal information collected from you will only be used for the purposes identified at the time of collecting the information and will be retained for as long as is necessary to fulfill the service, or as required by law.

Security measures including passwords, restricted access to our offices and records and physical access security, have been put in place to protect your information against unauthorized access, modification, loss, theft or general misuse.

Questions, Concerns and Complaints

If you have any questions, concerns or complaints regarding matters of privacy please contact us. In most cases concerns can be resolved by discussing it with one of our Client Service Representatives.

Phone: 800-530-0204 or 416-860-9880

Email: privacy@iaclarington.com

If your concern has not been resolved to your satisfaction, please contact our Privacy Officer.

Phone: 1-888-860-9888 or 416-860-9880

Email: privacy@iaclarington.com

Write to: Privacy Officer
Sarbit Asset Management Inc.
522 University Avenue, Suite 700
Toronto, ON M5G 1Y7

If after contacting our Privacy Officer your concern remains unresolved, you may contact the Privacy Commission of Canada:

The Privacy Commission of Canada
112 Kent Street
Ottawa, Ontario
K1A 1H3
Phone: 613-995-8210 or 1-800-282-1376

Or in Quebec:

The Commission d'accès à l'information
575, rue St. Amable, Bureau 1.10
Québec, Québec
G1R 2G4
Phone: 418-528-7741 or 1-888-528-7741