Privacy Policy

Protecting your Personal Information

Lightyear Capital Inc. considers your personal privacy to be an important part of our service to you. We understand the need to safeguard information about you that you have entrusted to us. As part of our commitment to you we have adopted principles designed to protect your privacy and prevent misuse of your personal information and help you understand our commitment to your personal privacy.

References to "Lightyear", "we" or "our" are to Lightyear Capital Inc. Our commitment to your privacy is demonstrated in Lightyear's website information practices, including what type of information is gathered and tracked, how the information is used, with whom the information is shared.

Where we use the term "personal information" we are referring to any information that identifies you as an individual and includes information with respect to your name, address, age, gender, income, marital status, finances, employment, trading history and website use information, together with your personal references and identification numbers (such as a social insurance number) but does not include name, title, or business address or telephone number of an employee of an organization.

Lightyear's privacy officer ("Privacy Officer") is responsible for overseeing compliance with this policy and applicable privacy laws, approving privacy procedures, supporting employee training, responding to access and correction requests, investigating complaints and privacy incidents, and reviewing Lightyear's personal information practices on a regular basis.

Lightyear's Principles on Privacy

We have incorporated certain principles for the protection of personal information in our Privacy Policy.

- *Collecting and Using Personal Information* - We will explain how we intend to use your personal information prior to or when we are collecting it and we will limit the personal information we collect to what we need for those purposes. We will use it only for those purposes we have explained to you, and we will obtain your consent if we wish to use your personal information for any other purpose.
- *Disclosing Personal Information to Others* - We may provide your personal information to other persons not affiliated with Lightyear, such as regulators, service providers or credit reporting agencies, but only where we have your consent or where we are required or permitted to do so by law.
- *Retaining and Protecting Personal Information* - We will retain your personal information only for the time it is required for the purposes we explain or as otherwise required by law. We will protect the personal information we obtain about you with appropriate safeguards and security measures.
- *Access and Accuracy* - We will provide you with reasonable access to your personal information on record with Lightyear and information about Lightyear's use and disclosure of that information. We will make every reasonable effort to keep your personal information accurate and up to date.
- *Accountability and Openness to Your Privacy Concerns* – We will hold ourselves accountable to you and we will investigate and respond to your concerns about any aspect of our handling of your personal information. We will explain the application of our Privacy Policy to your personal information and explain your options of refusing or withdrawing consent to the collection, use and release of your personal information, and we will record and respect your choices.

Why Does Lightyear Collect Personal Information?

We collect, retain, and use personal information about you only when we reasonably believe that it will help administer our business or provide products, services and other opportunities to you as our client.

Your social insurance number is required for products that earn investment income, to comply with the Canada Revenue Agency's income reporting requirements. Providing your social insurance number for credit reporting purposes is optional. If you provide your social insurance number, we also use it to keep your personal information separate from that of other clients with a similar name, including information we obtain with your consent through the credit approval process.

How Does Lightyear Collect Personal Information?

We obtain most of our information about you directly from you. With your consent, we may obtain personal information about you from third parties. For credit or margin purposes, for example, we may need to know your creditworthiness. For this reason, we may contact other lenders or credit reporting agencies to give us information on your credit history. We may also contact references you have provided to verify information that you have given us. We will not do this without your consent, but please remember that if you do not give your consent, we may not be able to extend credit or margin services to you.

When Does Lightyear Release Personal Information?

Lightyear does not sell client lists or personal information to others.

We do not reveal personal information about you to parties outside our affiliated companies for their independent use unless you request or authorise it, the information is provided to complete a transaction initiated by you, or the disclosure is otherwise permitted or required by law. We may disclose information to authorities where permitted or required by law, including to prevent or investigate fraud, money laundering or other criminal activity. We may also be required to disclose information to securities regulators and oversight organizations to which we are subject, including the Canadian Investment Regulatory Organization, for audits, examinations or investigations relating to specific accounts or our business generally.

Sometimes it is necessary to provide personal information about you to a party outside Lightyear or our carrying broker, Haywood Securities Inc. ("Haywood" or "Carrying Broker"), such as to a vendor or service company that we hire to do our data processing or prepare your account statements or to provide support or services for one or more of our products. These vendors and service companies agree to safeguard confidential information about you and your products and services with us and must abide by applicable law.

Does Lightyear Provide Options?

When consent is required, Lightyear will provide information in understandable language about the personal information being collected, the purposes for which it will be used or disclosed, the parties or types of parties to which it may be disclosed, and any reasonably foreseeable consequences of the collection, use or disclosure. The form of consent will be appropriate to the sensitivity of the information and the reasonable expectations of the individual. Lightyear may collect, use or disclose personal information without consent only where permitted or required by applicable law.

You may choose whether to provide personal information or consent to our obtaining it from third parties. In many cases, you may refuse or withdraw your consent at any time. However, if you do not provide the requested information or consent, we may be unable to offer certain products or services, or you may be ineligible to use them. For example, you may refuse a credit check, but we may then be unable to provide credit or margin services.

Lightyear will explain your options of refusing or withdrawing consent to the collection, use or release of your personal information, and we will record and respect your choices. If you wish to discuss your options, you may do so by contacting Lightyear's designated privacy officer set out below. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent.

How Long Does Lightyear Retain Personal Information?

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. The length of time we retain information varies depending on the product or service and the nature of the information and may extend beyond the end of your relationship with us but only for so long as it is legally necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your personal information is no longer needed, we have procedures to destroy, delete, erase or convert it to an anonymous form.

How Does Lightyear Protect Personal Information?

Lightyear stores and process your personal information in Calgary, Alberta and through the offices of Haywood in Vancouver, British Columbia, Canada.

We maintain security standards and procedures to help prevent unauthorised access to confidential information about you. Our security standards and procedures are updated and tested from time to time to improve the protection of our information about you and to assure the integrity of our personal information.

We have procedures that limit employee access to personally identifiable information to those employees with a business need to know such information about you. We educate our employees about the importance of confidentiality and customer privacy through standard operating procedures, special training programs, and our internal policies. We take appropriate measures to enforce employee privacy responsibilities.

All our suppliers and agents, as part of their contracts with Lightyear, are bound to maintain your confidentiality and may not use the information for any unauthorised purpose. When we provide information in response to a legal or regulatory inquiry or order, we ensure that the order is valid and we disclose only the information that is required – otherwise we will seek your consent prior to disclosing any information.

Our Carrying Broker uses third party providers of information technology and data processing services that may store or process your personal information outside of Canada. Your personal information may be disclosed in response to valid demands or requests from government agencies under applicable law in those jurisdictions. If you do not wish your personal information to be stored or processed outside of Canada, please notify your Investment Advisor and request that your account be closed.

What about the Internet?

We share your concern about your privacy in the Internet world and are committed to its protection. The principles set out in this Privacy Policy apply equally to anything you might do at our website.

When you visit our website, Lightyear may collect technical information such as your Internet Protocol address, browser type, device information, pages viewed, referring website, and the date and time of your visit. Lightyear will identify the purposes for any cookies or similar technologies it uses and will provide appropriate notice and choice where required. Information about specific cookies, analytics tools and third-party technologies will be made available through the website's cookie notice or a comparable disclosure.

When you contact us by email, we collect your email address and any information you choose to include in your message. We use this information to respond to your inquiry, provide requested information or services, and maintain a record of our communications with you. We do not sell, rent, or disclose your email address to third parties except as required by law or as necessary to provide our services. We may use your email address to contact you regarding your inquiry, provide information about our services, discuss solutions that may be relevant to your needs, or otherwise communicate in connection with our business relationship. While we take reasonable measures to protect information transmitted to us, including the use of industry-standard security technologies, email is not always a secure method of communication. Accordingly, we recommend that you do not send sensitive, confidential, financial, or personal information through ordinary email unless appropriate security measures have been arranged in advance.

By communicating with us by email, you acknowledge and accept the inherent security and privacy risks associated with electronic communications.

Our Website may contain links to other websites. When you click on one of those links, you are contacting another website for which Lightyear has no responsibility and over which Lightyear has no control

How Do I Access My Personal Information

You may request access to your personal information on record with Lightyear and information about Lightyear's use and disclosure of that information by contacting your Investment Advisor or Lightyear's Privacy Officer. We will advise you in advance of any fee and will respond within the period required by applicable law. Access may be limited or refused only where permitted or required by law, including where the information is protected by legal privilege, would reveal confidential commercial information that cannot reasonably be severed, or would disclose personal information about another individual. If access is refused, Lightyear will explain the reason for the refusal and identify available recourse, subject to any legal restriction on providing that explanation.

If you have any questions regarding decisions made about you, we will tell you about the reasons for those decisions. Where relevant, we will provide you with the name and address of the credit reporting agency from which a report was obtained.

How Do I Keep My Personal Information Accurate?

Lightyear attempts to keep its records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information. If you find any errors in our information about you, let us know and we will make the corrections immediately and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

Who Should I Contact Regarding Privacy Issues

Lightyear's Privacy Officer will respond to your concerns or questions about privacy and confidentiality – or any concerns about the way a request for personal information was handled. To reach our Privacy Officer, please refer to the following:

- *in writing*, at Suite 660, 202-6th Avenue SW, Calgary, Alberta, T2R 2R9;
- *by telephone*, at *403-218-1409*;
- *by facsimile*, at *403-536-6512*; or
- *by e-mail*, at *privacyofficer@lightyearcapital.com*.

If your concerns remain unresolved, you can contact Lightyear's Compliance Officer directly in writing, as above.