

## PRIVACY PROTECTION NOTICE

1. **Client account and Personal Information:** The personal information collected about clients for the purposes identified in this Privacy Notice is held in a record called the “client record”. The personal information in client records may include a client’s name, address and telephone number, social insurance number, birth date, account holdings and the name, address and social insurance number of spouses and beneficiaries. Depending on the investment or service requested, additional personal information may be held in the client record. For example, if a client establishes a pre-authorized systematic payment plan, the client’s financial institution account number for such a plan is also held in the client record.
2. **Providing Personal Information to Lawton Partners:** In order to make an investment, to provide instructions to Lawton Partners about an investment already made, and/or to receive information related to an investment product, clients may disclose information to Lawton Partners concerning spouse, beneficiaries, and/or other family members. Lawton Partners collects this personal information, holds it in the client record, uses it and, when needed, discloses it for the purposes identified in this Privacy Notice. Lawton Partners may collect, use and disclose client personal information to third parties to provide to clients products and services for which Lawton Partners is not directly licensed.
3. **Collecting, Holding, Using and Disclosing Personal Information in Client Records:** Lawton Partners may collect, hold and use the personal information in a client record as well as collect personal information from or disclose personal information to the third parties identified below for the following purposes:
  - a. identifying the client and ensuring the accuracy of information contained in each client record;
  - b. establishing and administering a client account, determining, maintaining, recording and storing account holdings and transaction information in the client account;
  - c. executing transactions with or through Lawton Partners including transferring funds by electronic or other means;
  - d. providing a client’s account statements, portfolio reports, tax receipts, financial planning documents, tax returns, financial statements for the investments that have been made, proxy mailings, transaction confirmations and other information which the client or his/her financial advisors, or dealers may request as needed to service the client’s account. Existing Lawton Partners clients prior to January 1, 2004, will continue to receive such documentation in the manner previously employed. If another method of delivery is preferred, the client must consent in writing to their Lawton Partners financial advisor. All new clients will consent to their preferred method of delivery when their accounts are established;
  - e. protecting its own business interests including collecting a debt owed to Lawton Partners or allowing the performance of a transaction;

- f. meeting legal and regulatory requirements including its disclosure to regulatory bodies and self-regulatory organizations, and use and disclosure by regulatory bodies and self-regulatory organizations; and
  - g. verifying information previously provided by a client with any other organization when necessary for the purposes provided in this Privacy Notice.
- 4. **Electronic Transmission of Private Information:** Lawton Partners will not send private client information via email or facsimile or other “electronic means” without client consent. Clients will be deemed to have consented to the use of electronic means to send to clients, or others specified by clients, information that contains private information by electronic means if a request is made for the information via electronic means. If a client specifically states that he/she does not want to have private information returned via electronic means, the client’s wishes will be honoured, and alternative methods will be used, such as Canada Post or courier.
- 5. **Third Parties:** Lawton Partners may collect client personal information for the purposes identified in this Privacy Notice from third parties such as financial advisors/dealers, other financial institutions, mutual fund companies, family members, and from other parties who represent that they have the right to disclose the information. Lawton Partners may disclose client personal information for the purposes identified in this Privacy Notice to third parties such as client financial advisors, dealers, other financial institutions and service and product suppliers, Canadian governments and government agencies such as the Canada Customs and Revenue Agency, account statement preparation and mailing companies, Canada Post, courier, imaging and document storage companies. When Lawton Partners transfers personal information to its agents, such as mailing companies, it ensures by contractual means that the transferred personal information is used only for the purposes for which the agent is retained. If a client wishes to withdraw consent to the continuation of this information-sharing or to discuss the implications of such withdrawal, a client may notify his/her Lawton Partners advisor. In some circumstances, legal requirements may prevent a client from withholding consent. A client’s decision to withhold consent may also limit the products and services that Lawton Partners is able to provide because the disclosure to third parties is a necessary part of making the product or service available.
- 6. **Using A Social Insurance Number:** Lawton Partners is required by law to use a client’s social insurance number when submitting application to third parties for products or services requested by the client, and may provide it to third parties engaged to provide income tax reports.
- 7. **Employees and Agents Who Have Access to Client Records:** Lawton Partners employees and agents may have access to client records provided they have a specific need to know in connection with the purposes identified in this Privacy Notice, and access is permitted only to the extent necessary for such purposes.
- 8. **Location of Client Account:** Client records, in electronic, microfilm or paper format, are stored at the offices of Lawton Partners Financial Planning Services

Limited in Winnipeg. Paper records forming part of client records may also be kept in offsite secure storage in Winnipeg. Client records may be transferred to other locations for disaster recovery purposes. All client records are protected by physical locks and passwords.

9. **Right to Access and Rectify Personal Information:** Except in limited circumstances prescribed by the Protection of Personal Information and Electronic Documents Act (Canada) and similar provincial privacy protection legislation, a client is entitled to access, through a written request, the personal information contained in his/her client record. A client may verify this personal information and request, in writing, that any inaccurate information be corrected. Lawton Partners can be contacted through client advisors toll free at 1-888-944-1144. If client concerns are not resolved to a client's satisfaction, he/she may send a written request to the Privacy Compliance Officer, Lawton Partners Financial Planning Services Limited, 1000-305 Broadway, Winnipeg Manitoba R3C 3J7. A client may also send an email to [privacy@lawtonpartners.ca](mailto:privacy@lawtonpartners.ca).

*Lawton Partners appreciates your business and promises to handle your questions or input regarding personal information in a prompt and courteous manner. Please inform us as soon as possible of any change in the personal information that you have provided to Lawton Partners by contacting your Lawton Partners advisor.*