

# PRIVACY POLICY

Infinite Investment Systems Ltd.

Version 23.0921



## PRIVACY POLICY

### WHAT WE COLLECT

Infinite Investment Systems Ltd. (“Infinite Investments” or “we” or “us”) is committed to maintaining the accuracy, security, and privacy of your Personal Information. “Personal Information” is information in any form which can be attributed to an identifiable individual, but does not include business contact information, such as your name, title or position, business address, telephone number, facsimile number, or e-mail address. To the extent that we de-identify your information so that it does not identify you as an individual, that information will not be considered “Personal Information”.

For our clients, we collect your business or home address and telephone number, business or personal email address, billing and account information, information about your company (including but not limited to information about the company’s affiliates and their respective directors, officers, shareholders, and employees), information about your securities holdings, information about your authorized users, and other information required to provide you our products and services. Our system allows our clients to input other information that may be considered personal information (e.g. customer date of birth) but is not required by our system to provide you with our products and services (“Client Inputted PI”). You acknowledge that we are not considered to be collecting, using or disclosing and such Client Inputted PI and therefore the terms of this Privacy Policy do not apply to Client Inputted PI.

For visitors to our website, we may use cookies to collect non-personal information such as the type of Internet browser and operating system used by you, the domain name of the website from which you came, the date and duration of your visit, number of visits, average time spent on our website, IP address associated with your computer, pages viewed, and number of cookies accumulated. Cookies are small browser features stored on the hard-drive of your computer which are used to track and collect information concerning your visit to our website. This information is only used for the technical performance of the website (including but not limited to ensuring the security of the website).

### HOW WE USE YOUR PERSONAL INFORMATION

We will use your Personal Information only in order to establish, develop and/or manage our client relationship with you and to provide you with the products and services you purchase from us (the “Purpose”).

We will not divulge your Personal Information to a third party unless such disclosure is:

- Expressly or impliedly authorized by you;
- Required by a third party in order for us to provide our services to you; or
- Required by law.

We will not disclose your Personal Information to any third party to enable them to market their products and services. Where we are permitted to disclose your Personal Information to third parties, we shall ensure that such third parties protect your Personal Information and use it only for the purposes that we instruct them to use it for.

We will only keep your Personal Information for as long as is reasonably necessary to fulfill the Purpose or as required by law.

Your Personal Information will be stored at all times on servers located in Canada.

### **PRIVACY BREACHES**

In the event that there has been unauthorized access or use of your Personal Information, our first priority will be to identify and contain the breach, and then to take steps to correct it. Where the breach has a real risk of significant harm to you, we will notify you (either personally or through a notice made available on our system or website) if your Personal Information may have been disclosed, lost, or shared in an unauthorized manner at the first reasonable opportunity. We will also comply with our obligations regarding reporting breaches of security safeguards to applicable regulatory authorities.

### **USE OF ELECTRONIC COMMUNICATIONS**

We would like from time to time to send commercial electronic communications (such as emails), with publications, announcements, event invitations, and other information, to subscribers, individuals with whom we have a commercial relationship, and individuals with whom we have a business or personal relationship. If you have not already provided us with such consent and wish to receive or continue to receive such communications from us, please feel free to contact us by email at [info@inf-systems.com](mailto:info@inf-systems.com). If you wish to withdraw your consent at any time, please feel free to contact us by email at [info@inf-systems.com](mailto:info@inf-systems.com).

### **CHANGES TO OUR POLICY**

We reserve the right, from time to time, to amend or change this Privacy Policy by posting such revisions to our website. Changes to the Privacy Policy shall be effective upon posting.

In the event that any amendment affects the purpose(s) for which we collect, use or disclose your Personal Information, we will obtain any additional consent required from you under applicable privacy laws.

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## IF YOU HAVE QUESTIONS

Any questions or comments about this Privacy Policy or our handling of Personal Information should be directed, preferably in writing, to our privacy officer, Chris O’Leary, who can be reached as follows:

Email	chris.oleary@inf-systems.com
Telephone	(416) 861-0911
Mail	100 King Street West, Suite 5310 First Canadian Place Toronto, Ontario, Canada M5X 1E1 P.O. Box 330

You may withdraw your consent to the collection, use or disclosure of your Personal Information provided that if your Personal Information is required to provide products and services, we will no longer be able to provide you with those products and services after the withdrawal of your consent and we will not be responsible for your inability to access our products and services as a result.