## THE SABO, JANG & CO. LTD. PRIVACY PROTECTION PLEDGE

At Sabo, Jang & Co. Ltd., we respect your privacy. That is why we have developed The Sabo, Jang & Co. Ltd. Privacy Code of which the objective is to specify Sabo, Jang & Co. Ltd.'s guidelines for the collection, use and disclosure of your personal information.

The Sabo, Jang & Co. Ltd. Privacy Code was developed to comply with the relevant portions of the *Personal Information Protection and Electronic Documents Act* (Canada). We have drafted The Sabo, Jang & Co. Ltd. Privacy Code to facilitate our compliance with this new legislation and to demonstrate our commitment to protecting your personal information.

We have also developed The Sabo, Jang & Co. Ltd. Privacy Protection Pledge. We want you to understand the purposes for which we collect personal information. We also want to make certain that we have your consent to continue to collect, use and disclose your personal information for those purposes.

The following is a brief synopsis of our privacy practices:

## Why do we need to collect your personal information?

If you are a Sabo, Jang & Co. Ltd. client, Sabo, Jang & Co. Ltd. may have collected some basic information about you. We respect your privacy, which is why we collect personal information <u>only</u> for the following purposes:

- To help us manage the services you contract with us;
- For use in the preparation of compliance reporting to federal or provincial agencies;
- To satisfy valid requests for information from regulators and other organizations or individuals who are legally entitled to issue such requests;
- For lawful purposes connected with a function or service provided to our clients where non-compliance would prejudice the interests of our client.

There is a variety of circumstances where we may need to disclose some personal information about our clients. Here are some examples:

- To help us manage the services you contract with us;
- For use in the preparation of compliance reporting to federal or provincial agencies;
- To satisfy valid requests for information from regulators and other organizations or individuals who are legally entitled to issue such requests;
- For lawful purposes connected with a function or service provided to our clients where non-compliance would prejudice the interests of our client.

In order to protect your personal information, Sabo, Jang & Co. Ltd.:

- 1. Will not collect, use or disclose your personal information for any purpose other than those identified above, except with your further consent;
- 2. Will protect your personal information with appropriate security safeguards;
- 3. Will protect the confidentiality of your personal information when dealing with other organizations;
- 4. Will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above; and

5. Will honor any request you may make for access to your personal information.

## What are your choices?

We would like to have your consent to continue to collect, use and disclose your personal information for the purposes identified above. However, you do have choices and can refuse or withdraw your consent as follows:

- 1. You may refuse to provide your personal information to us.
- You may also withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

However, in either case, this may limit our ability to serve you.

If you have any questions or concerns about our personal information management system, please contact the Sabo, Jang & Co. Ltd. Privacy Officer at 1-877-951-2001 or via mike@sabojang.com. Otherwise, we will assume that we have your consent to collect, use and disclose your personal information for the purposes identified above and in a manner consistent with The Sabo, Jang & Co. Ltd. Privacy Code.

Please visit the Office of the Privacy Commissioner of Canada's web site at www.privcom.gc.ca.

## The SABO, JANG & CO. LTD.'s Commitment to Privacy

At Sabo, Jang & Co. Ltd., respecting privacy is an important part of our commitment to our clients and employees.

Our commitment to privacy is reflected in The Sabo, Jang & Co. Ltd. Privacy Code, which has been developed to comply with the relevant portions of the *Personal Information and Electronic Documents Act* (Canada). In this respect, The Sabo, Jang & Co. Ltd. Privacy Code governs our behaviour with respect to the collection, use and disclosure of our clients' and employees' personal information.

We have also developed The Sabo, Jang & Co. Ltd. Privacy Protection Pledge to explain why we collect personal information, how we use personal information and how we keep such information protected. A copy of The Sabo, Jang & Co. Ltd. Privacy Protection Pledge is being made available to all of our clients. You can also review it at www.sabojang.com.