



PRIVACY POLICY AND AGREEMENT

September 2022

Privacy Policy

Privacy is Important

Protecting the privacy of your personal information is an important part of the services that Paradigm provides to all of the clients and employees of Paradigm Capital Inc. (“**Paradigm**”). Whether you are a personal client, an individual associated with one of our corporate or institutional accounts or an employee, it is imperative that we safeguard the personal information that you have entrusted to us.

The following Paradigm Privacy Policy (“**Policy**”) has been designed to protect this information, prevent its misuse and demonstrate our commitment to your personal privacy. The policy outlines the personal information collected about you, how Paradigm uses this information, who we share this information with and how we protect this information while under our control.

Personal Private Information

Personal Private Information (“**PPI**”) about individuals is primarily collected from new client/account application forms and other documents submitted to us in opening an account. We also collect information about securities transactions and other business relationships with us.

As a private client on an individual basis, a settler or beneficiary of a trust or a beneficial owner of a non-individual company, the PPI obtained would include:

- Your name, address, and other contact information.
- Your age, occupation, and marital status.
- All-embracing financial information such as investment experience and risk tolerance, investment objectives and information concerning net worth, current income and employment status.
- Date of Birth.
- Social Insurance Number to comply with our reporting requirements by the Canada Revenue Agency (“**CRA**”).
- Certain valid, unexpired government-issued identification documentation (e.g. passport, driver’s license) which are examined by an employee or agent of Paradigm for purposes of satisfying Anti Money Laundering (“**AML**”) functions.
- Records of trading and account activity.



- Cheques and Financial records of all transactions in relation to trading in securities.

PPI Used for Account Opening

In opening a corporate or institutional account, the PPI obtained would be for persons authorized to initiate trading orders and for significant (25% or greater) beneficial owners that would include:

- Name and contact details.
- Role, position or title.
- Certain valid unexpired government-issued identification documentation.
- Corporate documentation and financial reports.
- Records of trading and account activity.
- Cheques and Financial records of all transactions in relation to trading in securities.

You would always have the option not to provide the PPI requested, or to refuse consent to our obtaining PPI about you from other resources; however, Paradigm may then not be able to open or maintain your account(s) or provide certain services to you.

Necessary Use of PPI

Upon opening your account, and depending upon the nature of the relationship with you, Paradigm will be required to obtain information sufficient to provide the proper level of service and supervision to your account. The products and services that Paradigm supplies to its clients are based on the relationship and information that is obtained. Your PPI is used to administer, operate, communicate, and manage your relationship with Paradigm; this includes Paradigm providing you with any applicable information, research, recommendations and advice that service your relationship. Your PPI is also used in our internal business operations and is necessary in fulfilling Paradigm's legal and regulatory requirements.

Necessary Sharing of PPI

Paradigm is an Introducing Broker that uses National Bank Independent Network ("NBIN") as a Carrying Broker to perform several back office administrative functions including record-keeping. Consequently, your accounts are held on the books of NBIN. This activity is governed by an operating agreement between Paradigm and NBIN, which incorporates all necessary privacy matters.

Upon written request, Paradigm and NBIN may also be required to provide your PPI to various regulatory organizations and government agencies that regulate Paradigm and its business; this can include, but is not necessarily limited to, the various Securities Commissions, regulators, CRA, and marketplaces of which Paradigm may be a member.



Regulators

Paradigm and its affiliates are regulated by various securities commissions and AML authorities, and are also members of the following Self Regulatory Organizations (“**SRO**”):

- Investment Industry Regulatory Organization of Canada (“**IIROC**”)
- Canadian Investor Protect Fund (“**CIPF**”)
- Financial Industry Regulatory Authority (“**FINRA**”)
- Securities Investor Protection Corporation (“**SIPC**”)

These organizations may require access to PPI current and former clients, employees, agents, officers, directors and others that has been collected or used by Paradigm. These SROs may collect, use or disclose such PPI obtained from Paradigm for regulatory purposes including:

- Surveillance of trading related activity for AML, manipulation, or fraud.
- Various examinations or inquiries.
- Investigations of potential regulatory or statutory violations.
- Updating regulatory databases.
- Enforcement or disciplinary proceedings.
- Reporting to securities regulators.
- Information sharing with securities regulatory authorities, regulated marketplaces, other SROs and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

Paradigm may also be required to provide a client’s PPI if provided with a court order requiring this information or in any civil litigation in which Paradigm is a participant.

Paradigm does not sell PPI

Paradigm does not sell PPI to third parties.

PPI Record Retention

Record retention laws and industry rules require Paradigm to update and maintain client PPI to operate the account and provide services. Further, Paradigm must retain this information after any client relationship ends for as long as legally necessary (to a minimum of seven years) in order to respond to any issue that may arise at a later date.

When no longer needed, Paradigm and NBIN have procedures to properly destroy physical records, and erase or delete all PPI maintained in electronic format.

Protecting PPI



Paradigm deploys high standards of information security in order to prevent unauthorized access and protect the privacy and confidentiality of all PPI. Paradigm's procedures are designed to prevent unauthorized access to confidential information and, as such, limits access to personal files only to authorized Paradigm employees or agents. Paradigm and its service provider, NBIN, educate and train our employees about the importance of confidentiality and customer privacy in dealing with your account. Since most of your personal information is in the form of account documentation and transaction records, Paradigm undertakes all reasonable steps to protect it through the use of locked filing cabinets, file access limitation protocols, password protection, and limiting access to only those employees who need it to service your needs quickly, completely and accurately.

Your Rights Under the Privacy Act

By opening the account and/or confirming our Privacy Policy and Agreement, you have consented to us obtaining, using and disclosing (as described) the PPI that you have provided to us.

Under the Personal Information Protect and Electronics Document Act (“**PIPEDA**”) you have a right to access your PPI by contacting Paradigm's Privacy Officer. Once your identity has been confirmed, Paradigm will provide you with copies of your PPI within a reasonable length of time. Paradigm encourages you to review PPI received on a regular basis such as account statements and trade confirmations, and to contact your representative to correct any inaccurate, incomplete or outdated information.

If at any time you wish to withdraw consent, Paradigm must be advised in writing and, once withdrawn, you must be aware that Paradigm may not be able to open or maintain your account(s) or provide certain services to you. The withdrawal of consent, however, may also be subject to legal and contractual restrictions.

If you have any questions or concerns regarding Paradigm's Privacy Policy and Agreement you may address your concerns to our Privacy Officer via compliance@paradigmcap.com or c/o:

**Paradigm Capital Inc.
Chief Compliance Officer
95 Wellington Street West, Suite 2101
Toronto, Ontario
M5J 2N7**



Privacy Agreement

1. Collection and Use of Personal Information by Paradigm Capital Inc. (“Paradigm”).

When you open an account with Paradigm, we will obtain personal information about you which will be kept on file in accordance with industry regulations.

Only authorized individuals and entities have access to this information. The information that we collect allows us to identify you, to protect you against possible fraud, to assess your potential investment needs so that we may suggest products and services to you which are appropriate for you, and to comply with legal and regulatory requirements.

2. Social Insurance Number (“SIN”) or Social Security Number (“SSN”)

If you are an individual, Paradigm may collect, use and disclose your SIN or SSN for income tax reporting purposes.

3. Disclosure of Personal Private Information (“PPI”) to External Sources

Paradigm may from time to time disclose your personal information to external sources such as credit agencies, other financial institutions and other parties who provide services to Paradigm.

4. Consent

Other than to regulators or government bodies, your consent is required before we may provide your information to any other third parties. The consent that you provide to Paradigm with regards to the collection, use and disclosure of your PPI may be cancelled by you at any time by providing written notice to Paradigm. Paradigm does not require your consent to the collection, use and disclosure of your PPI where:

- Such collection, use and disclosure is reasonably required in the normal course of providing service to your account.
- For the collection of a debt owed to Paradigm by you.
- To a law enforcement agency, securities regulatory authority or self-regulatory Organization.
- To legal counsel for the purpose of obtaining advice.

By opening an account at Paradigm, you are providing consent to Paradigm to collect, use and disclose your personal information as set out in this agreement.



6. Corrections to PPI

You may review the PPI you have provided to Paradigm and make corrections to it. We may request that you provide corrections in writing.

You may address corrections, questions or privacy-related complaints to compliance@paradigmcap.com

Or to

**Chief Compliance Officer
Paradigm Capital Inc.
95 Wellington Street West, Suite 2101
Toronto, Ontario
M5J 2N7.**

7. Retention of PPI

Paradigm may retain your PPI on file after you cease to be a client of Paradigm for as long as Paradigm requires such information or as long as is demanded by our regulatory requirements.

8. Mandatory Breach Reporting

Any data breach where the incident presents a risk of significant harm will be reported both to the person(s) whose data is affected, as well as to the Office of the Privacy Commissioner of Canada (OPC) and in the case of Quebec residents, the Commission d'accès à l'information (CAI). Significant harm may include bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on a person's credit record, and damage to or loss of property. A register of any such confidentiality incidents will be kept on site, and available to the OPC & CAI upon request.

BY OPENING AN ACCOUNT AT PARADIGM, YOU ARE PROVIDING CONSENT TO PARADIGM TO COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION AS SET OUT IN THIS AGREEMENT