

PRIVACY AGREEMENT & CONSENT

1. INTRODUCTION

- 1.1. The Personal Information Protection and Electronic Documents Act (“PIPEDA”) sets out the rules for the collection, management, use and disclosure of personal information. It is supposed to balance an individual’s right to the privacy of personal information with the need of organizations to collect, use, or disclose personal information for legitimate business purposes. Financial companies choose how they share your personal information. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
- 1.2. Protecting the privacy and safeguarding the personal information (as defined below) of our clients, including financial information, and Web site visitors is one of Friedberg Direct’s highest priorities. The following Privacy Policy explains how we collect and protect your information. By opening an account or by using our Web site, you give your consent to the collection, use and disclosure of personal information by us as explained in this Privacy Policy.
- 1.3. Accounts are opened with and are held by Friedberg Direct. Ava Trade EU Limited, a company incorporated in Ireland (company registration number 460012) with its registered office at 5 Lamps Place, Amiens Street, Dublin 1, Ireland, together with its affiliates and subsidiaries, collectively the “AvaTrade Group”) may provide you with certain technical support services to Friedberg Direct with regards your trading account. While all registrable activities shall be done by Friedberg Direct, your account may, in part, be serviced through subsidiaries within the AvaTrade Group and your personal information may be maintained in AvaTrade Group’s systems and accessible to appropriate AvaTrade Group personnel. AvaTrade Group has privacy policies which are consistent with Friedberg Direct’s as described below.
- 1.4. When used in this Privacy Policy, and consistent with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and substantially similar provincial laws, personal information means “any information about an identifiable individual”. This may include, for example, your name, contact information, email-address, financial information, and information relating to your account with us, including your identity and the services you use. Information that is de-identified and/or aggregated, which cannot be associated with an identifiable individual, is not considered to be personal information.
- 1.5. How We Protect Personal Information: We limit access to your personal information to those FMGL employees who need to know it in order to comply with regulatory requirements, service your account, and help you accomplish your financial objectives, by providing you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so, including yearly risk and vulnerability assessments, and privacy impact assessments (related to acquisition, development and redesign of information systems or electronic delivery project involving personal information). We maintain physical, electronic and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone. We protect our servers via strong firewalls, brokers and all personnel use 2 step verification access to their computers to safeguard your privacy. We constantly update our antivirus and spam filters for cyber security threats. Any breach of security safeguards that can cause significant harm to your private information will be

reported to you and the Privacy Commissioner of Canada, and if you are a Quebec resident, based on Quebec's Bill 64, we will notify the Commission d'accès à l'information (CAI) and affected individual when a prescribed breach occurs. We will keep records of breaches of security that affect your personal information for at least 2 years. Information that is not needed for the purpose of doing business with FMG Ltd. is destroyed/deleted.

1.6. What Does Friedberg Direct Do With Your Personal Information: When you submit the New Customer Application Forms we collect personal information about you for business purposes, such as processing your application, processing your requests and transactions, and thereafter maintain an account with FD informing you about new products and services that may be of interest to you, and providing customer service. The need to collect the information is required by the self-regulatory organizations that oversee our industry. The personal information we collect about you includes:

- Information you provide to us on subscription documents, applications and other forms, such as your name, address, bank account, date of birth, social insurance number/social security number, occupation, assets and income.
- Account statements and other information about your transactions with us.
- Information we receive from consumer reporting agencies, such as your credit history and creditworthiness.
- Information you provide to us to verify your identity, such as your drivers license or passport.
- Information received from Canadian/US or foreign governments, or other entities not affiliated with us.
- Recorded conversations with employees.

2. COLLECTION OF PERSONAL INFORMATION

- 2.1. We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences.
- 2.2. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and to identify who you are. We also collect demographic information when you open an account, including, birth date, education, occupation, etc. and information about your transactions with us. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.
- 2.3. We collect information related to your use of the Web site and of your use of the products and services we offer.

3. USAGE OF PERSONAL INFORMATION

We use personal information only as appropriate to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you and customize your browsing experience. It can also be used to inform you about additional products, services or promotions that may be of interest to you, subject to your right to withdraw consent which you may exercise in the manner described in the section entitled “Marketing” of this Privacy Policy.

4. OUR AFFILIATES AND PARTNERS

We may share information with affiliates if the information is required to provide the product or service you have requested or, subject to your right to withdraw consent detailed in section 8.3, to provide you the opportunity to participate in the products or services our affiliates offer. We may share personal information described above with our affiliates for business purposes, such as, but not limited to, servicing client accounts and informing clients about new products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law. Our affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company, most of these companies are outside of Quebec. The information we share with affiliates may include any of the information described above, such as your name, address, trading and account information. Our affiliates maintain the privacy of your information to the same extent FD does in accordance with this policy.

We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

5. NON-AFFILIATED THIRD PARTIES

- 5.1. We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.
- 5.2. We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities, including financial service institutions (e.g., dealers, brokers and banks), auditors, lawyers and the companies under contract to perform services for us or on our behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and services. Or when necessary to protect our rights or property. These companies acting on our behalf are required to keep your personal information confidential. Except as described in this privacy policy, we will not use your personal information for any purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so

- 5.3. To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, order fulfillment, client service, client satisfaction surveys or other support services or data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with whom we share personal information are required to protect personal information in a manner similar to the way we protect personal information.
 - 5.4. If we become involved with a merger or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer. However, in the event the transaction is completed, your personal information will remain protected by applicable privacy laws. In the event the transaction is not completed, we will require the other party not to use or disclose your personal information in any manner whatsoever and to completely delete such information.
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6. SECURITY

- 6.1 All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Web site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 6.2 Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Web site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.
- 6.3 We endeavor to keep our customer files complete and accurate. We will give you reasonable access to the information we have about you. Most of the information is contained in account documentation that you submit to obtain our services and statements that you receive from us. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have any questions or concern about your personal information or this privacy notice, please contact your investment adviser or Enrique (Rick) Zauderer, FD's Chief Privacy Information Officer.

7. RESTRICTION OF RESPONSIBILITY

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Policy. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party and you should familiarize yourself with the privacy policy provided by that third party.

8. MARKETING

- 8.1. Subject to your right to withdraw consent detailed in section 8.3, we may use your data to provide you with information about our goods and services which may be of interest to you and we or our agents may contact you about these by post, telephone or electronic means.
- 8.2. If you are an existing customer, we will only contact you by electronic means (such as email, voicemail or SMS) in compliance with applicable law, including Canada's Anti-Spam Legislation. You may unsubscribe from receiving commercial electronic messages from us at any time by using the unsubscribe mechanism detailed in such communications.
- 8.3. If you do not want us to use your data in this way please tick the relevant boxes when we collect your marketing preferences. You may change your preferences at any time by contacting a Client Services representative using the information available in the "Contact Us" section of this Policy. An opt-out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold with us.

9. ACCESS AND RECTIFICATION

You can log into your client web portal and/or an online account at any time to access and update the information you have provided to us. Additionally, we comply with all laws regarding access and correction to your personal information. If you need assistance updating your personal information, please contact us using the contact information detailed in the Contact Us section below.

Retention Of Personal Information: FMGL may retain your personal information on file after you cease to be a client, for as long as FMGL requires such information or as long as is demanded by our regulatory requirements. We will provide you, upon request, your personal information that we hold.

10. PERSONAL INFORMATION OUTSIDE CANADA

Your personal information may be transferred to countries outside Canada. For instance, your account information (not your account) may also be accessible by AvaTrade Group, as our support services provider in the European Union. When your personal information is transferred to jurisdictions outside Canada, it may be subject to the laws applicable in these jurisdictions and may be made available to government authorities under lawful orders and laws applicable in such foreign jurisdictions.

11. USE OF "COOKIES"

- 11.1. We use cookies to assist us in securing your trading activities and to enhance the performance of our Web site. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.
- 11.2. We may share Web site usage information about visitors to the Web site with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you have visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.
- 11.3. We use the following types of cookies:
 - 11.3.1. Essential/Strictly Necessary cookies help make a website usable by enabling basic functions like page navigation, request for services and access to secure areas of the website. The website cannot function properly without these cookies. These cookies do not store any personally identifiable information.
 - 11.3.2. Performance/analytics cookies collect information about how you use the website, which pages you visit and if you have errors. These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. These cookies do not store any personally identifiable information.
 - 11.3.3. Functional cookies enable a website to remember and record information about choices that you have made, and they also allow us to tailor the website to suit your needs. These cookies do not store any personally identifiable information.
 - 11.3.4. Targeting cookies may be set through our site by our advertising partners, e.g. DoubleClick by Google. They may be used to build a profile of your interests and show you relevant adverts on other sites. If you do not allow these cookies, you will still see the same number of advertisements, however they may be less relevant to you. These cookies will be on by default but can be managed directly by visiting Google's Ads Personalization and/or Your Online Choices. We may share Web site usage information about visitors to the website with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you have visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

11.3.5. Third party cookies are presented by companies with whom we work as part of our marketing initiatives. The third parties that we use, and the purpose of their tracking can be seen in the table below.

Type	Third Party	Description	Expiry	Opt-out mechanism
Targeting	Google Analytics	Website traffic analysis	2 years	Using web browser.
Targeting	Double click		30 days	http://www.youronlinechoices.com/ie/your-ad-choices
Performance	Visual Web Optimizer	A/B testing software which we use to test variations of web pages to see which one works best.	Between 100 days and 10 years	Using web browser.

11.4. If you wish to block cookies, you may do so through your browser's settings. You can delete cookies that are already on your computer and you can set your browser to prevent them from being placed going forward. Please refer to the browser's help menu for further information. However, please bear in mind that disabling cookies may adversely affect your user experience on the Service. For more information on how to manage your cookie settings in respect of third party cookies please go to www.allaboutcookies.org. If you are primarily concerned about third party cookies generated by advertisers, you can turn these off by going to <http://www.youronlinechoices.com>.

12. CHANGES TO THIS PRIVACY POLICY

From time to time, we may update this Privacy Policy. In the event we change this Privacy Policy, the revised Privacy Policy will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. If the changes are significant, we will provide you with a more prominent notice. You agree to accept posting of a revised Privacy Policy electronically on the Web site as actual notice to you. Any dispute over our

Privacy Policy is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this Policy does not address, please contact a Client Services representative.

13. CHANGES TO THIS PRIVACY POLICY

By opening an account with us, you are providing your consent for us to collect, use and release your personal information. You are not required to supply any of the personal information that we may request, but failure to do so may result in our being unable to open or maintain your account or provide services to you. Further, while we make every effort to ensure that all information, we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information. If you do not wish to have your personal information disclosed to our affiliates or other third parties as described in this policy, please contact us via e-mail at privacy@friedberg.ca or send your request to:

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Email: support@avatrade.ca
www.avatrade.ca

If at any time you wish to withdraw this consent, please advise us. However, please note that withdrawing consent may mean that we will be unable to provide certain services to you. We will explain the consequences of withdrawing consent, should you choose to do so.