



## Clear Street Canada's Privacy Policy

Clear Street Canada Inc. ("**CSC**," "**we**," "**our**," or "**us**") has a policy of protecting the confidentiality and security of personal information that it collects about its customers. The purpose of this Canadian privacy policy (the "**Policy**") is to explain how and for what purposes we collect, use, share or otherwise process your personal information and how we safeguard the confidentiality of your personal information, whenever you interact with CSC or when you access CSC's Canadian website [www.centerpointsecurities.ca](http://www.centerpointsecurities.ca) (the "**website**"). If you decide to close your account(s) or you become an inactive customer, we will still adhere to this Policy and act as otherwise required by applicable law.

### Personal Information

In the Privacy Policy, "personal information" generally means information (regardless of its format) that can be used, either alone or in combination with other information, to identify an individual. This may include, for example, name, contact information, mailing address, email address, transaction history and other information relating to your account with us (as the case may be). It may also include other types of more technical information, but only when this information can identify you as an individual. Information that is aggregated and/or anonymized and cannot be used alone or in combination with other available information to identify an individual is not considered to be personal information.

### Collection of Personal Information

CSC collects personal information from various sources for the purposes outlined in the **Use of Personal Information** section. Specifically, CSC collects personal information as described below:

#### Information Collected from You

CSC obtains most of the information it requires directly from you when you open your account with us - whether in person, by telephone or electronically (e.g., by email). CSC may verify this information.

#### Information Collected from Third Parties

CSC may receive additional information, including creditworthiness or credit history, from other financial institutions or service providers whom you may have authorized to provide us with such information and/or consumer reporting agencies, verification services or public sources. This information may relate to your finances, employment, avocations or other personal characteristics, as well as interactions with or through CSC or others.

#### Information Collected Automatically

We use cookies (small computer files that a website's server places on your computer) and other technologies to automatically collect information about your online behavior when you use our website. You can set your browser to reject cookies, but this may impair our ability to customize and test your experience, like remembering your preferred language or present location-specific

30 Adelaide Street East, 12th Floor, Toronto, ON M5C 3G8

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information to you. See the Your Choices section for more information on how we automatically collect your information.

## Categories of Personal Information Collected

CSC collects, uses and stores the following categories of information in connection with providing you with its services:

- **Identity Data**, such as your name, date of birth, marital status, Social Insurance Number (SIN), and other data on government-issued identification documents;
- **Contact Data**, such as your email address, mailing address, and telephone number;
- **Financial Data**, such as your bank account details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;
- **Profile Data**, such as your username and password information that you use to create and access your account on our website, preferences, feedback, and survey responses;
- **Additional Data You Provide**, such as the information you may provide us via focus groups, survey responses, customer support, or other means.
- **Online Data**, such as information from your mobile and online activity; for example, information about your web browser, time zone, Internet Protocol (IP) address, mobile network information, website use, links clicked, time spent on our website, pages viewed, and conversion information.

## Use of Personal Information

We may use your personal information for general business purposes such as providing or delivering a product or service requested from CSC, managing our business and website, preventing or reducing commercial risk, as well as for purposes relating to information, system or network security.

More specifically, we may use your personal information for the following general business purposes:

**Providing or delivering our products and services.** We use your personal information for activities that are necessary to provide or deliver our products and services, for instance:

- Managing any aspect of the products or services we offer, including servicing your account on our website.
- Processing and executing securities transactions or funds movements at your direction by electronic or other means.
- Providing you with information about our products and services which may be of interest to you, including determining whether you are eligible to invest in our products.
- Assessing an application for a product or service, including to determine whether or not to offer you the product or service.
- Establishing and administering customer accounts which involves determining, maintaining, recording, and storing account holdings and transaction information in applicable client records.
- Updating your personal information and records.

- Ensuring information in our records is accurate and verifying previously given information when necessary.
- Sending you our investment-related information.
- Providing you with account statements and other account related information, financial statements, tax receipts, proxy mailings, transaction confirmations and other information which may be requested or needed to service your customer account, including through our online Investor Portal.

**Managing our business operations.** We use your personal information for several reasons in connection with our business operations, which include:

- Exercising due diligence to prevent or reduce our commercial risk, such as administering our good governance requirements and those of other members of the CSC entities or management and auditing of our business operations.
- Ensuring the security of our information, system or network.
- Complying with legal and regulatory obligations, requirements and guidance (e.g., securities legislation applicable for opening an account and applicable legislation respecting money laundering, including respecting the identity of account holders).
- Satisfying regulatory audits, assessments, requests or requirements.

**Managing our website.** When you visit our website, we may use your personal information to manage and facilitate the use of our website, which may include using cookies and other similar technologies.

**Marketing purposes.** We may use your personal information to provide you with personalized content and services, such as tailoring our products and services, our customer experience and offerings, and deciding which offers or promotions to show you. For more information on this topic, see the Your Choices section.

Please advise that we may also use your Personal Information in other ways we notify you about at the time we collect your Personal Information or as otherwise permitted or required by law.

## Sharing of Personal Information

We may share your personal information within the CSC entities, with our service providers (companies that carry out activities on our behalf) and in the case of the sale or transfer of our business or another transaction.

We may also share your personal information with your consent (for instance, with another financial institution, or similar organization such as your custodian, at your request) or in accordance with applicable law. We may share your personal information as set out below:

### a. Among the Clear Street entities

The Clear Street entities may share personal information among themselves and use it for the purposes described in this Policy. This allows each entity to comply with applicable laws, regulations and requirements, and ensures that your information is consistent, accurate and up to date. In addition, it increases the quality and relevance of the services

you receive and improves your interactions with Clear Street through easier access to your information within the group.

**b. Service providers**

We may transfer personal information to our agents, vendors or other organizations that provide services to CSC, for the purposes set out in this Policy. Service providers who may be provided with personal information include the carrying broker, account statement preparation companies, attorneys, accountants, auditors, administrators, visual identity verification companies, cloud computing and enterprise software companies or other service providers.

When CSC transfers personal information to our service providers, we ensure by contractual means that the transferred personal information is used only for the purposes for which the service provider is retained and is protected to the same degree as it is when in our possession. Our service providers may be located around the world, as further detailed in the Cross-border Transfers of Personal Information section.

**c. Sale or transfer of our business or other transaction**

- i. We may decide to sell or transfer all or part of our business to a third party, merge with another entity, secure our assets or proceed with any other financing or other strategic capital transactions (including insolvency or bankruptcy proceedings), restructuring, share sale or other change in corporate control. We may share your personal information when required for the purposes of such a transaction.

**d. Other permitted reasons**

We may share your personal information when permitted or required by applicable law, for instance:

- i. With domestic and international governments, government agencies, law enforcement agencies and regulators when compelled by law, such as disclosure for tax purposes to the Canada Revenue Agency or to securities regulatory authorities in accordance with securities regulations.
- ii. With any person or organization, fraud prevention agency, regulatory or government body, the operator of any database or registry used to check information provided against existing information, or insurance companies or financial or lending institutions for the purposes of detecting or suppressing financial abuse, fraud, criminal activity, money laundering violations, anti-terrorist due diligence, and to protect our assets and interests, assist us with any internal or external investigation into potentially illegal or suspicious activity or manage, defend or settle any actual or potential loss in connection with the foregoing.

Please consult the Your Rights section for information on how you may opt-out of such disclosures of your personal information.

## **Protection of Personal Information and Data Governance**

CSC strives to maintain systems that are secure and that meet industry standards. Specifically, CSC has policies and practices to ensure the protection of your personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used, and the format

in which it is stored, we implement a combination of measures to protect your personal information, including:

- Internal policies and procedures that define the roles and responsibilities of our employees throughout the life cycle of an item of information and limit their access to that information on a “need-to-know” basis;
- Physical, electronic and procedural safeguards that comply with relevant standards to protect customer information;
- If the information is collected or stored electronically, technical safeguards such as encryption, firewalls, passwords, anti-virus software and similar measures;
- A designated privacy officer to monitor CSC’s compliance with applicable privacy laws;
- Employee training in privacy and information security; Procedures for receiving, investigating, and responding to complaints or inquiries about CSC’s information handling practices;
- Contractual protections to ensure that service providers with whom we share personal information maintain adequate protections and security standards. For example, we generally require our service providers to limit their use and retention of personal information to that which is necessary to perform their services and to notify us in the event of an actual or suspected confidentiality incident. We also attempt to monitor and verify their compliance with these requirements in a variety of ways (e.g., on-site inspections (where possible), surveys and interviews, proof of certification).

## **Cross-border Transfers of Personal Information**

Some of our external third-party service providers are based outside of Canada, including in the United States and the United Kingdom and their processing of your personal information will therefore involve a transfer of information outside of Canada. Organizations based outside of Canada may not be subject to privacy laws that provide you with the same rights and protections as in Canada. As a result, when your personal information is used or stored in a jurisdiction other than where you are residing, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

## **Retention**

CSC will only retain personal information as long as necessary for the fulfillment of the purposes for which it was collected and for which consent was received, unless otherwise authorized or required by law. Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous.

## **Minors**

We do not knowingly solicit or collect personal information from children under the age of 14, and you may not create an account on our website if you are under 14. If we learn that a child under the age of 14 has provided us with personal information without the verifiable consent of a parent or legal guardian, we will take reasonable steps to delete that information.

## Your Rights

You may be entitled to access your personal information and request the correction of inaccurate information, subject to limited exceptions set out in applicable laws.

**Your right to access your information.** You have the right to ask us whether we are using or storing your personal information. You may also ask us to access that personal information.

**Your right of rectification.** You have the right to ask us to rectify any personal information that you consider to be incorrect, inaccurate, or equivocal, and to complete any information that you consider to be incomplete. You may also have the right to request rectification of your Personal Information if the collection, disclosure or retention of that information is not permitted by law.

If you desire to exercise any of the rights listed above, please submit a written request to do so at [privacy@clearstreet.io](mailto:privacy@clearstreet.io). Please be advised that we may verify your request to correct or access your information by asking you to provide information that matches the information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

Your right to opt-out. Please be advised that you have a right to withdraw your consent to CSC's collection, use, and communication of your personal information. If you desire to do so, please submit a written request to the following address:

**Clear Street Canada Inc.**

Privacy Officer

30 Adelaide Street East, 12th floor

Toronto, ON, M5C 3G8

Email: [ComplianceCanada@clearstreet.io](mailto:ComplianceCanada@clearstreet.io)

However, note that if you withdraw your consent, CSC will be unable to establish an account for you as the processing of your personal information, including its communication to third parties, is necessary to establish and maintain your account. Further, all other information sharing in which we participate is required by CSC's regulators and/or law enforcement agencies. Additionally, CSC reserves its right to share appropriate personal information about you with our attorneys, accountants, auditors and service providers in order to effectively discharge its obligations with applicable laws, including securities laws and regulations.

## Your Choices

As briefly mentioned in the **Collection of Personal Information** and **Use of Personal Information** sections, we use third-party advertising and analytics services to better understand your online activity on our website and serve you targeted advertisements.

For example, we use Google Analytics, and you can review the "How Google uses information from sites or apps that use our services" linked here: <http://www.google.com/policies/privacy/partners/> for information about how Google processes the information it collects. These companies collect

information about your use of our services and other websites and online services over time through cookies, device identifiers, or other tracking technologies. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver advertisements targeted to your interests on our Services and other platforms, as well as to provide advertising-related services to us such as reporting, attribution, analytics, and market research.

For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices). You should also review your mobile device settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioral advertising purposes. Please note, as a self directed broker-dealer, we do not advertise on behalf of specific securities or investment options on our services.

## **Changes to this Privacy Policy**

CSC reserves the right to make changes to this Policy from time to time at our sole discretion. Any changes we make will be effective when we post the revised policy on our website. If we make any significant changes to the Policy, we will post a notice on our websites or contact you to inform you when required by law. By continuing to interact with us after the modified version of the Policy has been posted, you are accepting the changes to the Policy, subject to any additional requirements that may apply. It is your responsibility to ensure that you read, understand and accept the latest version of the Policy. The “Effective Date” at the top of this Policy indicates when it was last updated. The current version of the Policy can be found at [www.centerpointsecurities.ca](http://www.centerpointsecurities.ca).

Note that the examples contained within this Privacy are illustrations and are not intended to be exhaustive.

## **Contact Us**

As previously mentioned, CSC has designated a Privacy Officer. If you have any questions, concerns or complaints regarding this Policy or CSC’s collection, use or disclosure of your personal information, please contact the Privacy Officer at:

### **Clear Street Canada Inc.**

Privacy Officer  
30 Adelaide Street East, 12th floor  
Toronto, ON, M5C 3G8