

# Privacy Policy

April 2014



**MUTUAL FUNDS**  
DONE DIFFERENTLY

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## **1. Protecting Personal Information of Investors**

Northwest & Ethical Investments L.P. ("NEI") is very serious about maintaining the confidentiality, integrity, and security of your personal information. We believe that treating your personal information with the highest degree of respect is integral to our relationship with you.

This privacy policy applies to the personal information of our individual (in distinction to institutional or corporate) clients (respectively, "Personal Information" and "Clients"). Personal information is information about an identifiable individual, with the exception of certain information relating to an individual in his or her professional capacity. For the purposes of NEI's services, personal information may include your name, home address, telephone number and email address, date of birth, social insurance number ("SIN"), banking and related financial information, and beneficiary instructions.

We appreciate that people are concerned about the confidentiality and security of their personal information, and we are committed to continuously reviewing the effectiveness of the tools we use to safeguard the confidentiality and protect the security of Personal Information you entrust to us.

This Policy is only one element of a comprehensive privacy and security program that includes training our employees and representatives about our policies, procedures, practices and security measures. We have appointed a Chief Privacy Officer whose role it is to monitor our compliance with this Privacy Policy.

## **2. Updating This Policy**

We reserve the right to add, delete, modify or otherwise amend this policy, as we deem appropriate, including, where necessary, changes to reflect current regulations and industry practices. For your convenience, the last date this policy was modified is provided on the Front page of this document. By continuing to use our services after this policy has been amended, you will be understood to have consented to the collection, use, and disclosure of your Personal Information in accordance with the amended policy.

## **3. Why We Collect Personal Information**

We collect Personal Information in order to meet statutory and legal requirements imposed by regulatory authorities, and to provide financial products and ongoing service to you. We collect your name, contact information, SIN, and other information necessary to open and maintain your account(s) with us, provide you with fund management services, keep records, prevent errors and fraud, and to respond to inquiries from your dealer or group plan administrator.

In most circumstances, we collect Personal Information from you through your dealer, employer or other group plan administrator ("intermediary"). When we collect information through an intermediary, it is subject to the intermediary having advised us that they have secured your consent. By completing an Account Application you have consented to the collection, use and disclosure of your Personal Information in accordance with this policy as well as to the transfer of your Personal Information to and from the intermediary.

Although the decision about whether to provide us with Personal Information always rests with you, we may be precluded from or limited in our ability to provide you with certain product and services if we do not have the information required by law.

We may record telephone calls for quality assurance, to ensure the accuracy of the Personal Information we collect over the telephone, and to properly record other instructions you may give us.

## 4. How We Use Personal Information

The following summarizes some of the Personal Information that we regularly collect and the purposes for its collection.

**Name, Mailing Address, E-Mail Address, and Telephone Number:** We collect this information to identify you and communicate with you including sending you statements and other important notices, obtaining your instructions and responding to your requests and inquiries.

**Date of Birth:** We collect this information to fulfill legal obligations to authenticate your identity and to protect you and NEI from error, identity theft and fraud.

**Social Insurance Number (“SIN”):** The Income Tax Act (Canada) requires us to obtain your SIN if there are tax implications arising from your financial transactions with us.

**Banking Information:** We use your banking information to facilitate trading with your account.

We may use Personal Information for our internal audit purposes which also assist in protecting you from illegal or fraudulent activity.

We may also use information about Client preferences to help us forecast our future business requirements. Such use is on a statistical basis only and will not identify individual Clients.

**We will not rent or sell your Personal Information to any third party.**

## 5. Disclosure and Transfer of Personal Information

### 5.1. Permitted Uses and Legal Requirements

The law permits us to collect, use, and disclose your Personal Information without your consent in certain circumstances, such as to assist investigative authorities or the courts, to protect the public interest (for example, to combat fraud or money laundering), to protect our interests (including to assist us in collecting a debt owed to us), and to protect your interests in circumstances where we are unable to obtain your consent in a timely manner.

The financial services industry is highly regulated and we also disclose Personal Information in accordance with legal obligations (such as obligations connected with tax reporting). We may be ordered by a court or other authority in Canada to disclose Personal Information to a third party or to the court or requesting authority in connection with an investigation or proceeding. In such circumstances, NEI will verify the legitimacy of the order and will take reasonable steps to limit the Personal Information that we disclose to that which is necessary to satisfy the order.

### 5.2. Business Operations, Transactions, Due Diligence

We disclose Personal Information for our business purposes. For example, we disclose Personal Information to our insurance provider to fulfill reporting or other requirements of our insurance policies, including in the event that a claim is made.

As we continue to grow, we may expand, sell or simply reorganize our business. We may disclose Personal Information in connection with a refinancing, the reorganization of our business (such as an amalgamation), our acquisition of a business, our disposal (through sale, assignment, or other means) of all or part of our business or assets, including for the purpose of permitting an interested party to conduct the due diligence required to determine whether to proceed with a transaction. If we assign or sell all or part of our business or assets, and the applicable privacy law does not operate to restrict the use and disclosure of Personal Information by the purchaser or assignee, we will use best efforts to restrict the purchaser or assignee to using and disclosing Personal Information for substantially the same purposes as described in this Policy.

### **5.3. Family Members**

Unless you authorize us to do so, we cannot disclose your Personal Information, including account information, to a member of your family, including your spouse, except where the family member is acting under a power of attorney or other legal instrument.

### **5.4. Transfer of Personal Information**

Our service providers include firms that perform specialized services, such as mailing statements, providing secured data storage and other information management services, and transacting trades on behalf of Clients. In general, the law permits us to transfer Personal Information to our Service Providers without consent, on the understanding that we remain responsible for the information while it is being used by our Service Provider. Our services agreements limit Service Providers to using Personal Information only to the extent required to provide their services, while also requiring them to establish policies to protect Personal Information against unauthorized access, use and disclosure, and to monitor compliance with their internal controls.

In the course of performing their duties, authorized NEI employees may have access to Personal Information to the extent that it is necessary to perform their duties. All employees who are likely to require access to Personal Information for their work receive training in the requirements of this policy and are required, on an annual basis to confirm receipt and understanding of our Code of Ethics for Business Conduct which addresses our Privacy Policy. An employee who knowingly breaches his or her obligations in regard to the Code of Ethics or other Policies may be subject to disciplinary measures, up to and including dismissal.

## **6. Safeguarding Personal Information**

We consider the protection of Personal Information to be a foundation of your trust and a sound business practice.

We employ physical, electronic and procedural controls (some of which have been described above), in keeping with industry standards and practices.

NEI maintains Personal Information in Canada, primarily in the Province of Quebec.

## **7. Access and Correction of Personal Information**

If you would like to review or correct your Personal Information, you may make a written request at any time. Please provide sufficient detail to enable us to identify you and your Personal Information, ensure that we only release your information to you, and determine whether we are able to make the change requested.

In some instances, we may not be able to provide the information you are seeking, for example where it involves commercially sensitive or proprietary information, information that is protected by solicitor-client privilege, information the disclosure of which could compromise the confidentiality of someone else's personal information (including a spouse, former spouse or family member), or where we are required or permitted by law to withhold the information.

## 8. Updating Your Personal Information

We ask that you advise us if there is a change in your Personal Information or if you become aware of an error in your Personal Information in our files. We ask that you provide any changes to us in writing to avoid misunderstandings and errors with regard to the correction being sought. If we are unable to make a requested change, we will make a note of the discrepancy and retain it with the applicable Personal Information.

If you are not satisfied with a decision we make on access or correction, you may follow the steps set out below in the Section on “Procedure for Privacy Inquiries, Complaints”.

## 9. Retention of Personal Information

We retain Personal Information in compliance with the requirements established in law (in general, for a period of seven years following the termination of our relationship with the client.)

## 10. How to Withdraw Consent

You may withdraw consent to our use and disclosure of your Personal Information at any time. However we will be required to comply with any contractual or other legal requirements to continue to use or disclose Personal Information. Our Client Relation Officers are available to explain any consequences of withdrawing your information consent and options so that you may make an informed decision. As mentioned above, if you do not consent to certain uses of your Personal Information, or if you withdraw your information consent, we may not be able to provide you with some or all of our products and services.

## 11. Procedure for Privacy Inquiries, Complaints

We welcome your questions about our personal information management practices and this policy. If you feel that your Personal Information has been compromised through an act or omission of NEI, we encourage you to contact us to resolve the matter.

**Step 1:** In most cases, any questions or concerns that you have can be resolved by discussion with one of our Client Relations Officers. Client Relations Officers may be contacted at:

**Mail:** 1200-151 Yonge Street, Toronto, ON M5C 2W7  
**Telephone:** 1-888-809-3333  
**Fax:** 1-416-594-3370  
**Email:** [clientservices@NEIinvestments.com](mailto:clientservices@NEIinvestments.com)

**Step 2:** If your inquiry or complaint cannot be resolved by the Client Relations Officer, you are invited to contact our Chief Privacy Officer by email [privacy@NEIinvestments.com](mailto:privacy@NEIinvestments.com), by fax (1-888-809-4444), by phone (1-888-809-3333), or by regular mail:

Attention: Chief Privacy Officer  
Northwest & Ethical Investments L.P.  
1200-151 Yonge Street  
Toronto, ON M5C 2W7

**Step 3:** If your inquiry or complaint cannot be resolved by our Chief Privacy Officer, you may choose to contact the privacy authority for the province in which you reside.

