

PRIVACY POLICY

Rivemont complies with the requirements of Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA") and the Act Respecting the Protection of Personal Information in the Private Sector (Quebec).

Privacy Officer

Martin Lalonde, Rivemont's Chief Compliance Officer is designated as the Privacy Officer.

What is personal information?

Personal information is information about a natural person that allows that person to be identified. It is confidential. With some exceptions, it cannot be disclosed without the consent of the individual concerned.

The information in the firm's files may include the following information about a client or principal, depending on the circumstances: the client's or principal's name, address, telephone number, social insurance number, date of birth, portfolio account, and the name, address and social insurance number of the client's or principal's spouse and beneficiaries, etc.

Consent and Use of Personal Information

The knowledge and consent of Rivemont's clients are required for the collection, use or disclosure of their Personal Information (except where inappropriate to do so), upon being informed of the purpose for which it is being collected. Consent must be given in writing before any collection, use or disclosure takes place (it is not presumed). Consent must also be given for specific purposes.

Rivemont may use or disclose this information to, among other things:

- Communicate with its clients or principals in a timely and efficient manner;
- Evaluate a request for investment or other services offered to its clients or their principals;
- Detect and prevent fraud;
- Analyze its financial results;
- Acting in any other manner required or permitted by law.

Personal information is also required to comply with applicable regulations (such as securities regulations and regulations against money laundering and terrorist financing).

Finally, personal information may also be required to enable the potential transfer of assets from another financial institution.

Protection of Personal Information

Rivemont takes great care to keep its clients' personal information confidential at all times. However, Rivemont may disclose confidential information to external parties for the purpose of conducting its business (e.g., regulatory authorities and service providers such as trustees, portfolio management systems, market intermediaries, etc.).

Rivemont takes reasonable steps to ensure the accuracy of personal information and subsequent updates.

Any customer may access his or her Personal Information at any time to review its content and accuracy. In order to exercise this right, the client must provide a written request. The Firm will respond to written requests within 30 days and may provide copies of relevant documents, if any (Rivemont will retain the originals in its possession).

In the event of a confidentiality incident

In the event that Rivemont experiences a data breach, the Firm will be required to perform a number of obligations, including:

- determining whether the breach poses a "real risk of serious harm" to any individual whose personal information was breached ("affected individuals") by conducting a risk assessment that takes into account the sensitivity of the information and the likelihood of its misuse
- as soon as possible, notify individuals of any breach that it believes poses a real risk of serious harm to them and report the breach to the Privacy Commissioner of Canada (the Commissioner)
- notify any other organization that may be able to mitigate the risk of harm to the individual
- Maintain a record of any data breach of which the organization is aware and provide it to the Commissioner upon request.

Any complaints specifically related to privacy should be made in writing and forwarded to

Rivemont Investments Inc.
Attention: Martin Lalonde
Chief Compliance Officer
202-160 Boulevard de l'Hôpital, Gatineau, QC J8T 8J1

Rivemont shall make readily available to individuals its policies and practices relating to the management of personal information. As such, a copy of this policy is posted on the company's website.