

Privacy policy

Barrage attaches great importance to the confidentiality and security of personal information.

This policy is established in accordance with the following regulations: *Personal Information Protection and Electronic Documents Act (Federal)*, *Act Respecting the Protection of Personal Information in the Private Sector (Quebec)*, *Personal Information Protection Act (Alberta)* and *Personal Information Protection Act (British Columbia)*.

Federal law applies in provinces where local law does not exist, for example in Ontario. In provinces where there is a specific law (Quebec, Alberta, British Columbia), the provincial law applies.

The actual Policy:

- must be available at all times on the Barrage Capital website for consultation by visitors, clients and regulatory authorities.
- is supplemented by the *Digital Data Privacy Policy* which governs the management of personal data collected on the Barrage Capital website. This second policy is also available on the website in the “Confidentiality” section.
- is also supplemented by the following internal procedures:
 - The Security Incident Management Policy
 - The Procedure in the event of a leak of personal data,
 - The Procedure for requesting access to personal information,
 - The Procedure for requesting de-indexing and deletion of personal information,
 - The Procedure for destroying and anonymizing personal information.

Principles governing the protection of personal information

1- Responsibility

Barrage is responsible for the personal information under its management. Barrage has personal information that represents a high-risk information asset. Any leak or misuse of this information risks compromising its integrity and confidentiality, in addition to possibly harming the individual concerned.

Barrage designates the Chief Compliance Officer as responsible for the protection of personal information. The role of the officer covers the following points:

- Ensure that Barrage complies with the legislative provisions regarding the management and protection of personal information.

- Ensure that Barrage has implemented the necessary measures to protect the confidentiality of the personal information held.
- Receive information requests, access to files and complaints, and deal with them in a timely and satisfactory manner.
- See that all staff are trained and aware of the protection of personal information.

More specifically in relation with Law 25, the tasks of the RPRP are:

- Approve the policies and practices regarding personal information that the company must establish and implement.
- Participate in privacy factor assessments (“PIA”) concerning certain information or electronic service delivery systems and suggest measures to ensure the protection of personal information processed in the framework of these systems.
- Record any communication (made without consent) to a company or public body likely to reduce the damage caused by a confidentiality incident and take part in the assessment of the damage caused by a confidentiality incident.
- Receive and respond to requests for access and rectification as well as requests related to data portability and the right to be forgotten.

In addition, the protection of personal information is the responsibility of all employees.

2-Definition of personal information

For the purposes of this policy, we will use the definition contained in the "*Act Respecting the Protection of Personal Information in the Private Sector*", which defines personal information as follows:

“any information which relates to a natural person and allows that person to be identified.”

3- Determination of the purposes for collecting information

The purposes for which Barrage collects personal information are:

- To enter into an employment contract.
- To provide portfolio management services.
- To meet regulatory requirements with respect to securities, money laundering and terrorist financing.

These purposes are specified to the individual before or at the time the personal information is collected.

4- Consent

All individuals must be informed and consent to any collection, use or communication of personal information concerning them, unless it is not appropriate to do so.

The consent of the individual concerned will be explicit and without any deduction on the part of Barrage. It will meet the following criteria:

- Free: expressed without conditions, constraints, or promises.
- Informed: formulated with awareness of its scope.
- Specific: authorizing the disclosure of personal information for a given purpose.
- Time-limited: valid for the duration required to achieve the purposes for which it is requested or for the duration prescribed by the regulations (whichever is longer).

The consent of Barrage clients is obtained in writing in the file opening form.

The only time Barrage will collect or disclose personal information without consent of the person concerned will be in circumstances required by law.

By their consent, customers implicitly authorize Barrage employees to use and consult their personal data in the normal course of their duties. Since Barrage employees can telework, consent also includes the use and consultation of data outside the territory of Quebec.

5- Discussion with potential clients

During discussions with a potential client, Barrage must collect personal information in order to verify whether the client's investor profile matches the risk profile of the Barrage Fund.

During these discussions, Barrage employees must obtain verbal consent from the client in order to collect the information necessary for the suitability analysis.

This information collected with consent may be archived for the following reasons:

- To provide regulators with the names of investors that Barrage has refused as a client for reasons of unsuitability.
- Retain client information in order to archive a history of discussions with eligible potential clients, but who have not yet made the decision to invest in the Barrage fund. Over the years, Barrage has also been able to observe that the investment decision must sometimes be considered for a long time by certain clients.

6- Limitation of collection

Barrage can only collect the personal information necessary for the purposes determined and must proceed in an honest and lawful manner.

Barrage collects only the type and amount of protected information that it needs in an essential way for its activities and for the purposes set out during the collection:

A. For customers

Personal information collected from customers will be used only for the purposes of providing services of Portfolio Management. The information requested is required under:

- Securities regulations (know your customer, insider declaration);
- Anti-money laundering regulations specifically regarding the identity of account holders and source of funds
- Tax regulations.
- Criminal regulations.
- Administration of the account by the trustee.
- The eventual transfer of assets from another financial institution.

B. For employees

The personal information collected will be used within the framework of the employment contract between Barrage and the employee.

7- Limitation of use, communication and retention

Personal information must not be used or communicated for purposes other than those for which it was collected unless with the consent of the person concerned or as required by law. Personal information should not be retained longer than necessary for the fulfillment of the identified purposes.

Use

Personal information is used only by persons who need this information in the performance of their duties relating to the portfolio management mandate and personnel management. They will in no case be used for purposes that are not relevant in this context.

Communication

Barrage communicates confidential information only to the external parties necessary for the exercise of its activities: regulatory authorities and service providers such as trustees, auditors and communication platforms. When Barrage uses these external parties, it ensures that the protection of personal information meets confidentiality requirements.

Barrage does not sell personal information or client lists to anyone. The discretionary portfolio management agreement provides that the identity of the client is not revealed to third parties, unless authorized by him.

Retention

Barrage will not be able to keep the personal information held beyond the time limits prescribed for the retention requirements, regardless of the medium used.

The retention period will not exceed the longest of the following deadlines:

- The duration necessary to achieve the authorized purposes, or
- The deadlines prescribed according to these legal requirements.

8- Accuracy

Personal information must be as exact, complete and up-to-date as required by the purposes for which they are used.

The personal information used by Barrage must be as accurate as possible and complete in order to minimize the possibility that erroneous information is used to make a decision about a customer or employee.

In particular, certain personal information concerning the financial situation of clients may have an impact on the management of their assets. Clients must inform Barrage of changes to their file.

Barrage will update this information, when necessary, to meet the identified purposes, or upon notice to that effect from the person concerned if the information is incorrect or out of date.

9- Security measures

Personal information must be protected by security measures corresponding to their degree of sensitivity.

The necessary measures are put in place on the material, administrative and technological levels in order to prevent loss, theft, consultation, communication, copying, use, modification, destruction or any other unauthorized use.

In all cases, the information is kept in a safe place, protected against unauthorized access and kept only for the time necessary. These measures apply regardless of the form in which it is stored.

Personal information communicated to third parties under contractual agreements must specify the confidential nature of this information and the purposes for which it is intended.

All Barrage employees who have access to personal information are required, as a condition of employment, to respect the confidentiality of such information.

10- Transparency

Barrage must make available to any person in an easily accessible manner precise information on its policies and practices concerning the management of personal information. This policy will be given to anyone who requests it.

11- Access to personal information

Barrage must inform any person who so requests of the existence of personal information concerning them, of their use and of the fact that they have been communicated to third parties, and allow them to consult them. It will also be possible to contest the content of the information and have it amended as appropriate.

Upon written request to the person responsible for the protection of personal information, any person concerned may consult his file. In order to ensure the protection of personal information, a client or an employee may be required to provide sufficient information for Barrage to provide access to the file in a secure manner.

Barrage will provide the personal information requested within a reasonable time (maximum 30 days). The information will be provided in an understandable and complete manner.

This right of access and modification covers:

- The right to consult the file free of charge.
- The right to have incorrect information corrected free of charge.
- The right to obtain a copy of the file for a reasonable fee covering the costs incurred in this regard, including the person concerned will be notified beforehand.
- The right to obtain the list of third parties to whom Barrage has or could communicate personal information for the exercise of its activities.

In certain circumstances provided for by the regulations, Barrage will not be able to provide the information requested. The reasons will be communicated to the applicant.

12- Possibility of filing a complaint against non-compliance with the principles

Anyone must be able to complain about non-compliance with these principles by contacting the person responsible for enforcing them.

If a person concerned wishes to file a complaint relating to the exercise of the rights resulting from this policy or to any situation related to the protection of personal information, he may do so by contacting the designated person in charge.

Any complaint will be studied carefully in order to ensure an adequate treatment. The person will be informed of the outcome of the investigation into their complaint. If the complaint is justified, Barrage will take the appropriate measures as soon as possible, including modifying its policies and procedures if necessary.

In the event of a disagreement with Barrage in the exercise of the rights set out herein, the person concerned may contact the Office of the Privacy Commissioner of Canada.

13- Breach of security measures

Barrage has the obligation to report to the Privacy Commissioner of Canada any breach of security measures (unauthorized communication, loss of personal information or unauthorized access to it) involving personal information under its control if it is reasonable to believe, in the circumstances, that the breach of security safeguards creates a "real risk of serious harm to an individual.

Serious harm includes bodily harm, humiliation, damage to reputation or relationships, financial loss, identity theft, adverse effect on credit reports, damage to or loss of property, and loss of employment or business opportunities or professional activities.

Factors relevant to determining whether a breach of security safeguards poses a real risk of serious harm include:

- the degree of sensitivity of the personal information involved in the breach of security safeguards and,
- the likelihood that these have been misused or are in the process of being misused.

Barrage keeps a record of all personal information security breaches it manages whether or not there is a real risk of serious harm. In other words, every breach of security measures must be logged.

Barrage is required to notify the person concerned of any breach of the security measures relating to personal information concerning him and under his management, if it is reasonable to believe, in the circumstances, that the breach presents a real risk of serious harm to him.

For more details, it is possible to consult the documents on the website of the Office of the Privacy Commissioner of Canada.

14- Disclosure of the Personal Data Management Policy

In order to comply with the requirements of the regulations, Barrage undertakes to make this policy available on request and to publish it on its website.

15- Approval of the Personal Data Management Policy

Barrage also undertakes to obtain consent for the collection and retention of personal data from customers. Consent is obtained either at account opening or as part of the process of updating customer files.

16- Application by employees

All Barrage employees must respect and apply personal data management policies and procedures.

17- Privacy Impact Assessment

In order to fully understand the importance of managing personal information, Barrage Capital conducted a Privacy Impact Assessment. This analysis conclude the current IT system includes sufficient security standards to protect customers' personal data.

18- Destruction and anonymization

Barrage has implemented the following policies regarding the destruction and anonymization of personal data no longer required for its operations:

- Under section 11.6 of Regulation 31-103, Barrage must retain the personal data of its former customers for 7 years following their departure.
- This regulatory obligation therefore affects the period before Barrage can destroy the personal data of its former customers.
- Barrage tracks customers' departure dates in order to destroy the data it holds on these customers as soon as the 7-year time limit is reached. An Excel file is used for this purpose.

19- List of authorized partners

As part of its customer account management operations, Barrage must frequently share, request or transfer personal customer data with business partners.

The following is a list of business partners with whom Barrage employees may share customer data:

- CIBC-Mellon.
- Fundserv.
- Other financial institutions with customer authorization.
- Canadian regulators, including AMF, CSO and FINTRAC.

20- Crisis management

Barrage undertakes to set up a crisis management team for any major incident that has caused a breach in the security of personal information.

This crisis management team could notably be made up of an internal manager, external consultants, the insurer and/or the police services.

References:

Personal Information Protection and Electronic Documents Act (Federal)

Act Respecting the Protection of Personal Information in the Private Sector (Quebec)

Personal Information Protection Act (Alberta)

Personal Information Protection Act (British Columbia).