

North Growth Management Ltd.

Privacy Policy- Clients

At North Growth Management Ltd. ("NGM"), we recognize our professional obligation to maintain the confidentiality of our clients' personal information, and our obligations concerning the personal information of all individuals that we collect, use or disclose.

What is personal information

Personal information is any information that identifies you as an individual and includes information regarding your name, address, age, gender, income, marital status, finances, employment, trading history, website use information and personal identification numbers (such as your social insurance number).

Why we collect personal information

In order to be able to provide financial services to our clients, we have an obligation to collect information that will enable us to "know our clients". This information will necessarily include personal information.

NGM only collects as much personal information about our clients as is necessary and required to provide them with appropriate financial advice with respect to our Funds, and to comply with the law.

How do we collect personal information

We collect personal information primarily directly from you through account opening forms and client meetings with you. With your consent, we may obtain personal information about you from a third party such as a credit reporting agency to verify your identification.

When we release your personal information

NGM does not sell personal information to third parties. We release personal information to parties outside NGM with your permission and when required by law.

With permission from the client. We frequently get requests from clients who would like to share their personal information with a trusted professional, like their accountant. We will disclose this information only with express written permission from the client.

When we are required to do so by law. For example, when you make purchases in our Funds, we are required to disclose your social insurance number to the Canada Revenue Agency in the preparation of tax filing slips and for periodic reporting purposes.

Other examples of legally required disclosures include:

Regulatory purposes. We are required to disclose purchases made pursuant to prospectus exemptions to the applicable Canadian Securities regulator.

Registered account administration. If you open a registered account (RSP/ RIF, TFSA or LRIP/LRIF) with us, your personal information may be shared with the trustee of the registered account for the purpose of administering the account.

Protection of the public interest. We are required to report suspicious transactions to the authorities under anti-money laundering laws.

Safeguarding Your Personal Information

The employees of NGM recognize our professional and legal obligations to protect the confidential information of our clients.

We have processes and controls in place to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. Your personal information is stored within Canada.

Internet e-mail is generally not secure and cannot be considered confidential. Please do not send us confidential or sensitive personal information via ordinary e-mail as we cannot assure you the privacy of that information.

NGM retains personal information for as long as may be necessary to respond to Fund related issues that may arise at a later date, and longer if required by law.

Access to Your Personal Information

You may request access to your personal information on record with NGM and information about our use and disclosure of that information by contacting the NGM Privacy Officer as follows:

North Growth Management Ltd.
Suite 830, One Bentall Centre
505 Burrard Street, Box 56
Vancouver, BC V7X 1M4

Telephone: (604) 688-5440
E-mail: chrislee@northgrowth.com

Updating Your Personal Information

Please help us maintain the accuracy of your personal information by notifying us of any change to your personal information that would be relevant to your dealings with NGM. If you find any errors in our information about you, please let us know and we will make the corrections as soon as we reasonably can.

Concerns

Please contact us if you have any questions with respect to our policies concerning the handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact our Privacy Officer at the contacts listed above.

Privacy Policy Updates

Periodically NGM will review its Privacy Policy. Changes will be posted on this page.