

# Privacy Policy

## INTRODUCTION

**ECN Capital Corp. (“ECN Capital”) is committed to maintaining and protecting the confidentiality and security of the personal information we collect. In this regard, we have developed this Privacy Policy which outlines the manner in which we collect information and describes how we use, disclose and safeguard the personal information that we collect. This Privacy Policy conforms to the requirements of the Personal Information Protection and Electronic Documents Act (“PIPEDA”) and the Canadian Standards Association Model Code for the Protection of Personal Information incorporated by reference into PIPEDA, as well as to the Act Respecting the Protection of Personal Information in the Private Section in Quebec.**

## COLLECTION AND USE OF PERSONAL DATA

ECN Capital collects personal information in order to provide you with the financial services that you have requested. We may gather this information from you by personal interview, telephone, facsimile, electronic mail, the Internet or from third parties that have your authority to disclose such information. We will not collect personal information on you or share such personal information with anyone without your consent. Pursuant to PIPEDA, personal information consists of information about an identifiable individual, but does not include the name, title, business address or business telephone number of an employee of an organization.

## WITHDRAWAL OF CONSENT

You may withdraw your consent to the collection or use of your personal information at any time on reasonable notice and subject to applicable law. Your withdrawal of consent may restrict our ability to provide to you with the financial services that you have requested.

## SHARING INFORMATION

We will not share personal information about you unless it is necessary in order to provide the services that you have requested or if we are required to do so by law.

In no event will we sell your personal information to a third party. In order to provide you with your requested services, we may, based on the consent provided, share your personal information for the purposes, for example, of conducting credit checks on you and to share the credit risk undertaken in providing services to you to our financial partners with an obligation to treat your personal information confidentially.

## STORAGE OF INFORMATION

All personal information that we collect is stored securely. Electronic files are kept in a highly secure environment with restricted access. Paper based files are kept in a restricted area in locked filing cabinets. Access to private information is restricted to authorized employees who have a legitimate business reason for accessing it. We may monitor traffic patterns, site usage and related site information to optimize your visit to our website. We do not use cookies or any electronic means to collect personal information from you or your computer, however, our website server will automatically collect IP addresses. We do not link such IP addresses to other personally identifiable information.

## SECURITY

ECN Capital uses reasonable measures to safeguard personal information from unauthorized access, disclosure, loss or misuse.

## YOUR ACCESS TO PERSONAL DATA

We will provide you with access to the personal information that we have collected. In the event that any information held in your personal files is inaccurate or out of date, please provide us with current information so that we may make the proper changes.

## HYPERLINKS TO OTHER SITES

This website may contain links to other third party sites that are not governed by this Privacy Policy. This Privacy Policy does not extend to any third party websites accessed through this website.

## QUESTIONS/CONCERNS

Any questions or concerns regarding our Privacy Policy, please contact our "Privacy Officer" at:

ECN Capital  
181 Bay Street, Suite 2830,  
Toronto, ON M5J 2T3

**PHONE** 416-646-4710

**TOLL FREE** 844-537-5663