



Privacy Policy

At OmniVita Custom Wealth Management Inc. ("OmniVita"), we are committed to protecting your privacy and safeguarding your personal, business and financial information. As part of our commitment to you we have adopted principles designed to protect your privacy and prevent misuse of your personal information and help you understand our commitment to your personal privacy.

The policies and procedures that OmniVita practices in order to protect your privacy and that of our employees are in place across our firm. References to "OmniVita", "we" or "our" are to OmniVita. Where we use the term "personal information" we are referring to any information that identifies you as an individual and includes information with respect to your name, address, age, gender, income, marital status, finances, employment, trading history and web site use information, together with your personal references and identification numbers (such as a social insurance number).

In the following pages, we describe our policies and procedures relating to personal information and how OmniVita puts them into practice so that you have control over how we collect, use and disclose your personal information.

Why does OmniVita collect personal information?

We collect, retain, and use personal information about you only when we reasonably believe that it will help administer our business or provide products, services and other opportunities to you as our client. We collect and retain personal information about you only for specific business purposes, and we will tell you why we are collecting and retaining it on your request. The information we ask for depends on the products or services you request and in most cases is required by law or the policies of the regulatory bodies that govern us.

We are required to ask for your Social Insurance Number or other tax identification number when you open an interest bearing or investment account under the federal Income Tax Act.

We are required to ask for citizenship or residential identification information when you open an account that may hold U.S. securities under contractual obligations that our firm



has assumed with the U.S. Internal Revenue Service.

We may require health information from you for some insurance products to ensure that you are eligible for coverage. Health information that may have been provided in connection with any insurance product is never shared.

With your consent, we may obtain personal information about you from third parties. For credit or margin purposes, for example, we may need to know your credit history. For this reason, we may contact other lenders you may have borrowed from or credit reporting agencies to give us information on your credit history. We may also contact references you have provided to verify information that you have given us. We will not do this without your consent but please remember that if your consent is withheld we may not be able to extend credit or margin services to you.

We are required to ask for personal information from our employees in order to provide benefits and to manage the employment relationship.

With your consent, we may share your personal information, where not prohibited by law, to our affiliated company for the purposes of referring life insurance, annuities and other specific insurance products and services to you. OmniVita may use your personal information to provide you with information about the products of OmniVita, services and other matters. This consent is optional, and you can decide to withdraw it at any time.

When does OmniVita share personal information with other persons?

We do not reveal your personal information to outside parties for their independent use unless you request or authorize it, the information is provided in order to complete a transaction initiated by you or the disclosure otherwise is lawfully permitted or required. We may disclose information to the authorities to serve a clear public interest and to fulfill our public duty, such as to protect against fraud, money laundering or other criminal activity. We may from time to time, be requested to disclose information to securities regulatory and securities oversight organizations that govern us such as the Canadian Investment Regulatory Organization (CIRO), or Canada Revenue Agency (CRA) for the purpose of an audit or investigation relating to specific accounts or our business generally. In certain circumstances, OmniVita may disclose your personal information if it believes, in good faith, that disclosure is otherwise necessary or advisable to protect its interests. OmniVita may also release your personal information where there is an emergency that threatens your life, health or personal security.



At times, OmniVita may use the expertise of an outside company to do work for us involving some of your personal information – for example, processing your account

Information or the mailing of shareholder information. When we use an outside company, we have them agree to safeguard personal information about you and your products and services with us and to abide by applicable privacy law.

OmniVita does not sell client lists or personal information to others.

Can clients of OmniVita withdraw or refuse to give consent?

It is always your choice whether or not to provide personal information or to consent to our obtaining personal information about you from third parties. You are free to refuse or withdraw your consent at any time provided there are no legal requirements to prevent this. You should be aware, however, that if you choose not to provide requested personal information or consents, we may not be able to provide certain products and services to you. For example, if you do not consent to a credit check, we may not be able to extend credit or margin services to you.

OmniVita will explain the implications to you of refusing or withdrawing consent to the collection, use or release of your personal information and we will respect your choices.

For how long does OmniVita retain personal information?

We retain your personal information only as long as it is required for the reasons it was collected and to meet legal requirements. The length of time we retain information varies depending on the product or service and the nature of the information. The length of time may extend beyond the termination of your relationship with us as a client but only for so long as it is legally necessary or advisable. When your personal information is no longer needed, we have procedures to destroy or delete it.

How does OmniVita safeguard personal information?

OmniVita is committed to the safekeeping of personal information in order to prevent loss, theft, unauthorized access, disclosure, duplication, use or modification. OmniVita will take all commercially reasonable steps to ensure that your personal information in our possession, collected from you, is protected against loss and unauthorized access. This protection applies to information stored in both electronic and hard copy form. Access to your personal information will be restricted to selected employees or



representatives. In addition, OmniVita will employ generally accepted information security techniques, such as firewalls and access control procedures to protect personal information against loss and unauthorized access.

The development of policies and procedures for OmniVita for the protection of personal information is an ongoing process. OmniVita is committed to developing, updating, and reviewing our information protection controls to ensure ongoing security.

How do clients of OmniVita access their personal information?

You may request access to your personal information held with OmniVita and information about how we use and disclose that information by contacting your investment advisor or by contacting the office manager of the office of OmniVita where your account is handled. We will advise you in advance if a nominal charge will be required for conducting the search and we will respond to your request promptly within 30 days. Please note that we may not be able to provide information about you from our records if it contains personal information of other individuals, is subject to legal privilege, contains confidential commercial information proprietary to OmniVita, or cannot be disclosed for other legal reasons. In such cases OmniVita will explain to you the reasons that it will not provide the requested information.

How do clients of OmniVita keep their personal information accurate?

OmniVita will make reasonable efforts to ensure that personal information is as accurate, complete and current as required for the purposes for which it was collected.

You can check your information to verify, update and correct it, and to have any obsolete information removed. If there is any dispute about your request for changes to your personal information, OmniVita will note your opinion on the file. There is no charge for verifying or correcting your personal information.



Who should clients of OmniVita contact regarding privacy issues?

OmniVita has designated a Chief Privacy Officer to respond to your concerns or questions about privacy and confidentiality – or any concerns about the fashion in which a request for personal information was handled. The contact information for our Chief Privacy Officer is as follows:

OmniVita Custom Wealth Management Inc.

P.O. Box 10135
Suite 1630 – 701 W. Georgia St.
Vancouver, B.C. V7Y 1K8
Attention: Chief Privacy Officer
Telephone: 778-373-8086
Facsimile: 778-373-8085

OmniVita will rely on any exceptions or qualifications that are set out in the applicable privacy legislation as permitted by law. Not all of these exceptions or qualifications have been disclosed in the privacy policy of OmniVita.

OmniVita reserves the right to modify its privacy policy at any time without notice. The privacy policy posted from time to time via the web site for OmniVita shall be deemed to be the privacy policy then in effect.