

PRIVACY POLICY

Introduction

Bolton Capital Canada Inc. ("Bolton" or "we") are committed to keeping your personal information confidential and secure. We have adopted a comprehensive privacy policy and have implemented practices to protect the confidentiality of personal information. Our business requires that we collect and process personal information of our investors who come to us either directly or through dealers and other intermediaries.

Bolton keeps all personal information in strict confidence and controls access to, and use of, such information based on the practices and procedures described in this statement.

Personal Information and Obtaining Consent

Documentation obtained from clients are designed to obtain only information that is required for contractual, income tax report and regulatory requirements, including but not limited to know-your-client requirements and anti-money laundering rules which are applicable to Bolton as an exempt market dealer, investment fund manager and portfolio manager.

We obtain investors' personal information directly from clients and obtain their consent to appropriate use of that information, in account forms and subscription agreements. Where investors are introduced to our products through dealers or other intermediaries, those firms also may provide us access to the investors' personal information. In those cases, such firms are required to obtain their customers' personal information as well as consent for its use. An investor's personal information allows us to:

- Establish an investor's identity;
- Determine an investor's eligibility for a product or service;
- Protect all parties against errors or fraudulent activity; and
- Comply with the law.

To help us keep our records accurate and complete, we ask clients to notify us of any personal information changes or corrections.

Our Use of Personal Information

Bolton may use personal information to:

- Identify the investor;
- Ensure our records are accurate;
- Establish and administer an investor's account(s);
- Execute transactions;
- Maintain, store, record, and determine investor account holdings and transaction records;
- Provide investors and their authorized advisors with statements/information;
- Provide investors with financial statements, tax receipts, unitholder mailings, transaction confirmations and other information that may be requested or needed to service their accounts;
- Provide investors with quality customer service and support; and
- Meet legal and regulatory requirements.

An investor's personal information will only be used for the purposes for which it was collected. Bolton may share personal information with other parties as required by law and with third parties assisting us in providing services, including investor recordkeeping, statement preparation and printing. Bolton has legal agreements with such third party providers to ensure the proper handling and protection of personal information. Additionally, we may be required to provide personal information when responding to a search warrant, court order or other legally valid request. In particular, we disclose your Social Insurance Number in order to comply with Canada Revenue Agency's income reporting requirements and the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

Storage and Security

Personal information in our possession may be kept in electronic or paper format in the offices of Bolton or our third party providers. Personal information may also be kept in secure offsite storage facilities. At Bolton we maintain such security measures as passwords and restricted access to our offices and records to protect personal information against unauthorized access, theft or misuse.

Bolton ensures that our employees and service providers are familiar with this privacy policy, and agree to abide by it.

Any personal information collected from an investor will be used for the specified purposes and will be retained for as long as is necessary to provide the service or as required by law.

Bolton does not collect any personal information from visitors browsing our website although personal information may be requested if a visitor chooses to send Bolton an email message. In addition, in the course of saving the contact information you enter in the forms on this site, Bolton uses a cookie to store information locally on your computer.

Questions and Concerns

Any inquires and complaints received will be reviewed by Bolton's Compliance Officer and, if required, forwarded to an investor's dealer or other intermediary.