



WEALTHBRIDGE

Privacy Policy

WEALTHBRIDGE GROUP LTD.
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WEALTHBRIDGE GROUP PRIVACY POLICY

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Introduction and Commitment

WealthBridge Group Limited, WealthBridge Investment Counsel Inc., and WealthBridge Financial Services Inc. (together referred to as “WealthBridge”, “we”, “us” or “our”) recognizes the importance of privacy and the sensitivity of personal information received by us in the conduct of our business. We are committed to operating in a manner that respects the privacy rights of our clients and to protecting the confidentiality of the personal information entrusted to us. This policy describes what personal information we collect, how and why we collect and use it, the circumstances when we share it, and how we protect it. We are committed to transparency and to ensuring that you are aware of your rights with respect to the personal information entrusted to us.

What is Personal Information

Personal information is information that identifies you or that can be used to identify you. This can include information such as your name and address, age, phone number and email address, marital status, income, and education and employment history.

Accountability

WealthBridge is accountable for the protection of all personal information within its possession or control. Each of our employees and independent contractors must comply with our privacy practices and are responsible for respecting and protecting the personal information to which he or she has access. WealthBridge has appointed a Chief Privacy Officer who is responsible for our overall privacy governance and management of our privacy program. The Chief Privacy Officer has the full support of senior management and has the authority to intervene on privacy matters relating to WealthBridge’s operations.

How We Collect Personal Information

Most of the personal information WealthBridge collects is provided by you, the client, through completing an application, opening an account, completing a financial plan or communicating with us. We may also collect information about you from a variety of sources, including from your own records with us, from transactions you have made with or through us, from credit reporting agencies and other financial institutions, and from references you have provided to us. If you use our tax and advisory services we may collect information from third parties with your consent such as the Canada Revenue Agency or your third party advisors. When you apply for or accept insurance offered by us, we collect additional personal information which may include health information.

Why We Collect, Use and Disclose Personal Information

We collect, use and disclose your personal information for the following purposes:

- to provide you with the services requested: for example, to better understand your financial situation and determine your eligibility for services we offer we may ask for

your education history, employment data, income levels, assets and liabilities, source of funds, estate documentation, and taxation records

- to verify your identity and to authenticate you when you contact us: for example, we may ask for your name, address, telephone numbers, email address, date of birth and other forms of identification such as driver's licence and passport
- to communicate with you about the services you have with us: for example, we may communicate with you by postal mail, email, fax, phone or other electronic means
- to assess insurance risk and to establish and administer insurance coverage, including the assessment of claims: for example, we need detailed financial information to advise on appropriate services and for certain services we may also need your personal health information
- for marketing and research purposes to improve our services
- to manage our risks and operations: for example, we may ask for additional information to investigate matters and settle claims, and we protect the security of our website by using monitoring programs that collect information about the IP address of the computer that contacted the website. We may use video surveillance in and around our office for the safety of our clients and employees and to protect against theft and damage to property
- to meet regulatory and legal requirements: for example, we are required to collect certain personal information to meet our anti-money laundering requirements and the "know your client" requirement under securities law

We will obtain your consent before using your personal information for any new purposes. We will not collect personal information indiscriminately, nor will we deceive or mislead individuals about the reasons for collecting personal information.

Why We Share Your Personal Information

We do not do not sell, lease or trade client personal information to others, nor will we make our data set available for public use. Your personal information may be shared among the WealthBridge companies on a need to know basis, and under certain circumstances with other third parties:

Sharing among the WealthBridge companies

- Sharing your personal information among the WealthBridge companies enables us to provide you with the services that you request in a way that is effective and efficient for you. We may also share this information to recommend additional services that we believe may interest you.

Sharing with third party service providers

- We may use service providers to perform specialized services on our behalf such as portfolio management administration, tax planning and data processing, to help us execute certain service offerings, and to provide specialized assistance with legal and financial matters. We also use service providers to protect the security of our website and to monitor network traffic. Other service providers assist us with various services such as IT services, printing, postal delivery, and courier services. Where

service providers are responsible for processing or handling personal information they are given only the information necessary to perform the services and are required to protect the information in a manner that is consistent with our own privacy practices.

Sharing with joint account holders or legal representatives

- With your consent, we share personal information with joint account holders or representatives (such as a legal guardian, attorney under a Power of Attorney, lawyer, or accountant). Joint account holders will each have access to all of the account history and transaction details for the account. We may also share personal information with your (or your joint account holder's) estate representatives or beneficiaries where reasonably necessary to administer the estate.

Sharing with insurance providers

- We may exchange personal information with insurance companies for the provision of insurance services.

Sharing with other third parties to meet legal requirements where we are required to do so or are permitted by law

- Personal Information may be released to third parties including legal or regulatory authorities in cases of suspected criminal activity, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments or regulatory authorities, to comply with a court order, or to establish or defend legal claims.

Obtaining Consent and Your Right to Refuse or Withdraw Consent

We will provide you with a copy of this privacy policy at or before the time of our first collection of personal information. We will obtain additional consent before collection for any new use not disclosed in this policy. For individuals who are minors, mentally incapacitated or otherwise unable to provide consent, we may obtain consent from a legal guardian, or person having power of attorney.

You can refuse to consent to our collection, use or disclosure of personal information, or you may withdraw your consent to our further collection, use or disclosure of your personal information at any time by giving us reasonable notice. Please note that you cannot withdraw your consent to the collection, use and disclosure of your personal information if we are legally required to collect, use or disclose it. Withdrawing your consent may also mean that, in certain situations, we may not be able to provide you with the services you request. To withdraw your consent, please contact us either in person or by phone or email using the contact information provided below.

How We Maintain Accurate Personal Information

We are committed to maintaining the accuracy of your personal information and we have implemented reasonable processes to ensure that it is correct and timely. In many instances we rely on information provided by you and it is important that you notify us in a timely fashion of any material changes.

You may also challenge the accuracy and completeness of the personal information we hold about you and have it amended, as appropriate by contacting us using the contact information set out below.

How We Protect Personal Information

We have implemented and will maintain the physical, organizational and technical security measures reasonably required to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. We also require our third party service providers to implement safeguards in a manner consistent with our practices and standards.

We will investigate any incidents involving the loss of or unauthorized access to or disclosure of personal information and take steps to mitigate any harm and implement processes to avoid any recurrence. Where a reasonable person would consider that there exists a real risk of significant harm to an individual as a result of the incident, we will notify you and the relevant regulatory authorities.

How Long We Keep Personal Information

We will only retain your personal information for as long as it is needed for the purposes described above, or otherwise to meet our legal obligations. *[You have the right to ask that we delete all personal information about you and we will comply with such request unless we must retain your personal information to meet our legal and regulatory obligations]*

When no longer required, personal information will be destroyed or erased in a manner that prevents improper access.

How to Access or Update Your Personal Information

In the normal course of business, you receive access to your personal information in the form of transaction activity records, including account statements, net worth statements, tax returns and tax proformas. This information is routinely available to you through mailings and the WealthBridge client portal.

If you wish to further review or verify the personal information held by us, or to find out to whom the information has been disclosed, you may make the request for access, in writing, to WealthBridge's Chief Privacy Officer using the contact information set out below. We will respond in a timely fashion.

Please note that there may be instances where access may be restricted as permitted or required by law. In such case, we will advise you of the reasons for restricting access subject to any legal or regulatory limitations.

You may request a correction of an error or omission in your personal information and, subject to our review, we will make the appropriate change as soon as possible. If we do not agree to make the amendments you request, you may challenge the decision by contacting us as outlined below.

Updates to this Privacy Policy

We may amend this policy from time to time to reflect changes in our personal information practices. We will post the revised Policy on our website and make it available to you through your WealthBridge representative or through a notice in your statement.

If changes to our privacy practices are significant, we will obtain your consent.

Inquiring About Our Privacy Practices

If you have any questions, comments, concerns or complaints about our policies and practices concerning the handling of your personal information, please contact our Chief Privacy Officer at:

WealthBridge Group Ltd.
200 Doll Block
116 – 8th Avenue S.E.
Calgary, Alberta T2G 0K6
Phone: (403) 263-6004
e-mail: privacy@wealthbridge.com

For more information about your privacy rights, you may contact the following:

- For Alberta clients: Office of the Information and Privacy Commissioner for Alberta (www.oipc.ab.ca)
- For British Columbia clients: Office of the Information and Privacy Commissioner for British Columbia (www.oipc.bc.ca)
- For Ontario clients: Office of the Privacy Commissioner for Canada (www.priv.gc.ca)

CONSENT

I (we) hereby consent to the following:

- that I have read and understood the WealthBridge Privacy Policy
- that I authorize/consent WealthBridge Group Limited, WealthBridge Investment Counsel Inc., and WealthBridge Financial Services Inc. to collect, use, and disclose personal information as outlined in its Privacy Policy as provided to me

CLIENT NAME	
POSITION (if a non-individual)	
SIGNATURE	
DATE	

CLIENT NAME	
POSITION (if a non-individual)	
SIGNATURE	
DATE	