



WEALTHERA  
PRIVACY POLICY

Updated on: April 9, 2025

At Wealthera, we need to collect personal information from clients and prospective clients to properly fulfill our responsibilities to our clients. Understanding the needs, goals, financial position, and family circumstances ensures that all our investment recommendations are suitable for the client. We are required to collect personal information to meet our obligations under securities laws and anti-money laundering regulations. We are committed to protecting Your privacy and the confidentiality of Your personal information in our possession. This policy explains the measures we take to fulfill these commitments.

This Privacy Policy may be updated periodically to reflect changes to our personal information practices. We encourage Clients to refer to the policy regularly. The latest version is available on our website as well as upon request.

WE ASK CLIENTS FOR NO MORE PERSONAL INFORMATION THAN NECESSARY.

The “Know Your Client” information we collect from Clients includes only the information we need to fulfill our contractual, regulatory, and income tax obligations. Some of the information we request will include:

- Information to establish the Client’s identity, for example:
  - name,
  - address,
  - date of birth,
  - citizenship,
  - etc.
  
- Information required to understand one’s financial situation and personal background, for example:
  - income,
  - investments,
  - debts,
  - marital status,
  - dependents,



**W E A L T H E R A**

- etc.
- Information required to comply with our tax reporting obligations, for example:
  - Social Insurance Number
  - Citizenships

Our account application forms elicit only the information needed, where required, to register these accounts with the government.

We will confirm with Clients that the personal information we have about Clients is accurate from time to time. Most of the information will be collected from Clients directly. We may however, collect additional information from other sources, including, without limitation, credit reporting agencies, other investment dealers or other financial institutions. We do not disclose any non-public personal information to any third party except as required by law or as outlined in this policy.

We do not sell, trade, or rent our clients' personal information.

#### WE LIMIT ACCESS TO CLIENT'S PERSONAL INFORMATION.

We record clients' personal information electronically on computer servers to which only authorized persons have access, and only by means of secure passwords. We authorize employees to have access to clients' personal information only on a "need to know" basis. We have installed hardware and software security to keep our servers clean and secure. We maintain a duplicate copy of our data at an offsite location for disaster recovery purposes. This data is password protected. If we retain paper copies of clients' personal information, we store it in locked filing cabinets. We keep the computers and filing cabinets in which such information is stored in areas of our business premises locked when not in use.

We retain Client information for no longer than necessary for the purposes set out in this policy or to meet our legal and regulatory requirements.

#### WE PREVENT UNAUTHORIZED DISCLOSURE OF YOUR PERSONAL INFORMATION.

We train our employees to keep clients' personal information strictly private and confidential. We require all our staff to certify that they will follow our policies and



## WEALTHERA

procedures which obliges them to respect and protect clients' personal information. We ensure that departing staff understand they remain contractually obliged to respect the privacy of clients' personal information. We shred paper documents containing clients' personal information before discarding such documents.

Client online access to a subset of one's personal information is available, all of which is password protected.

### WE EXPECT SIMILAR SAFEGUARDS FROM OUR SERVICE PROVIDERS.

We may use service providers to provide us with various services such as technology, administration, custody, printing, marketing, legal and accounting. In some cases, our service providers may collect information about Clients on our behalf. We will require them to have a similar privacy policy or to agree to acknowledge and abide by ours.

When Clients open an account with The Firm, Clients will open an account and sign an account agreement with a custodian. The custodian provides safekeeping of one's securities as well as trade execution, clearing and other services. We will share personal information with that custodian. The information we share will ensure that we can provide Clients with the services and information that Clients expect from us and that we are required to provide under applicable regulations.

### CLIENTS CAN REVIEW WHAT PERSONAL INFORMATION WE HAVE ABOUT CLIENTS.

Clients may obtain access to the personal information we hold about Clients at any time and review its content and accuracy and have it amended as appropriate. We may have to restrict the information we provide as required by law. To request access, Clients should send a written request to your advisor or to the Chief Compliance Officer of Wealthera.

### PRIVACY IS A PARAMOUNT FOR OUR BUSINESS.

Our Chief Compliance Officer is responsible for ensuring that we adhere to our privacy policy. The Chief Compliance Officer is responsible for training our employees in our privacy policies and for monitoring the fulfillment of our privacy commitments. For further information on Privacy at The Firm please reach out to [privacy@wealthera.ca](mailto:privacy@wealthera.ca).