

## Canada Privacy Policy

### **Commitment**

AscendantFX is committed to protecting your personal information. We will collect, use and disclose your personal information only as permitted under the law to provide you with the best possible service.

### **Scope**

This policy details how AscendantFX Capital, Inc. (“AscendantFX”, “we”, “us” and “our”) collects, uses and discloses your personal information. “Personal information” is defined as any information about an identifiable individual and may be stored in any format. This policy applies to the collection, use and disclosure of personal information of our clients that we deal with in Canada (“you” and “your”).

It outlines the commitment we make to protect, manage and secure your personal information. This policy does not apply to our employees, or to corporate entities. AscendantFX exercises due diligence and care to protect the confidentiality of business information. The policy does apply to individuals carrying out business on their own and to the signing officers of business entities.

### **Why we collect your personal information**

AscendantFX collects your personal information in order to provide you with excellent service. AscendantFX will notify you at or before the time of collection of the purposes for which personal information is collected. We may collect personal information, for example:

- To establish a personal relationship with you and verify your identity
- To efficiently deliver the services you have requested
- To meet regulatory requirements
- To develop and manage products and services to meet your needs
- To contact you about products and services that might be of interest
- To grant credit where it has been requested

### **What information we collect and how we use it**

AscendantFX may collect personal information directly from you, from other financial



institutions, from government agencies, from products and services that you use or request, from credit bureaus or from references that you have provided to us.

AscendantFX will advise you of the purposes for which personal information is being collected. In some cases, AscendantFX may ask for your express consent, such as in the case of conducting credit or background checks. In other cases, your consent may be implied by your acceptance of our terms and agreements or by using a product or service that you have requested.

AscendantFX will not routinely collect more information than is necessary to provide you with the products and services you have requested, or as required by law. The information we collect, use and disclose is for purposes that a reasonable person would consider to be appropriate in the circumstances. We will only collect personal information by means that are fair and lawful and will not mislead you about the purposes for which personal information is collected.

AscendantFX may collect, use or disclose your personal information without your consent only as authorized or required by law. For example, AscendantFX may collect, use or disclose your personal information without your knowledge or consent in exceptional circumstances, including:

- When the information is needed to assist in an emergency that threatens an individual's life or personal safety
- When certain information is publicly available
- When collecting a debt owed to AscendantFX
- When the information is necessary for a legal proceeding or investigation into a breach of agreement or contravention of law
- Where information is authorized or required by law
- Where collection, use or disclosure of information is clearly in the interests of the individual to whom it relates

You may withdraw your consent to the use and disclosure of your personal information at any time, unless the information is necessary for AscendantFX to meet its legal obligations. AscendantFX will respect your decision to withdraw consent; however, we may not be able to provide you with certain products and services.

When you access an AscendantFX website, we may collect information about your computer and the internet settings you are using to connect to our site. Please see the section below on Online Activities for more information about the information that is collected when you are using our website or online services.

## **Disclosure and Sharing of Personal Information**

No personal information will be disclosed to anyone outside AscendantFX, except: For everyday business purposes such as to process your transactions, manage your account(s), perform information technology functions, respond to lawful government requests, investigations or court orders, or to offer you products or services;

- To our service providers who perform services on our behalf, such as data processing and storage, fraud prevention and detection, regulatory compliance, bank services and treasury management and payment functions;
- Where you have provided us with your consent;
- To obtain legal advice from a lawyer;
- As permitted or required by law;
- For the purpose of selling part of the business or to assess or complete the purchase of new businesses;
- As otherwise specified within this policy.

Through contractual agreements and by other means AscendantFX will ensure that other parties to whom personal information is provided are obligated to protect your personal information in a manner that meets or exceeds AscendantFX's own security provisions.

In order to provide you with services, your personal information may be provided to service providers, suppliers or agents located inside and outside Canada. Where required by law, your personal information may be provided to government agencies, courts, regulators, and law enforcement agencies located in other jurisdictions.

## **Protection of Personal Information**

AscendantFX is committed to protecting the personal information you provide to us, and preventing its loss, theft, access, disclosure, duplication, use or modification without your authorization.

Appropriate security measures will be employed based on the sensitivity of the personal information. We maintain physical, organizational and electronic security measures to protect your personal information. These include the use of locked physical locations, limited access to personal information by employees and contractors, and the use of passwords and encryption technologies.

We will use appropriate security measures when disposing of your personal



information. Employees are aware that personal information must be kept confidential and all employees receive appropriate training to ensure that safeguards are maintained. Personal information is accessed by employees for the specific purpose of performing their work functions, and all employees abide by our Code of Ethics that includes obligations of confidentiality and privacy. All of our service providers and partners are bound to maintain the confidentiality of your personal information under contract, and not use your personal information for any unauthorized purposes.

Unfortunately, personal information that is transmitted using email is not fully secure and AscendantFX cannot guarantee the security of personal information sent using email. AscendantFX is not responsible for any damages suffered when you send personal information through email or when we send personal information through email at your request. Once we receive your information, your orders for foreign exchange transfers or money transfers are placed over a secure connection and encrypted.

### **Accessing Your Personal Information**

As a client of AscendantFX, you have a right of access to your own personal information, subject to certain exceptions. AscendantFX will inform you of what personal information it holds about you, how it has been used and where applicable to whom it has been disclosed. Personal information will be made available in a format for clients with a sensory disability.

This information will be provided to you at no or minimal cost. Where costs for access to your personal information may occur, AscendantFX will notify you in advance of those costs, and wait for your consent to proceed with the request.

In some instances, we may not be able to provide information about you from our records if the records contain references to other persons, are subject to legal privilege, contain confidential information proprietary to AscendantFX, relate to an investigation of a breach of agreement or contravention of laws, or cannot be disclosed for other legal reasons. Where possible, we will attempt to remove the information listed above from the records and provide those records to you in a modified format.

AscendantFX will make this information available to you within 30 days of your request unless providing information to you within that time period would unreasonably interfere with business operations or restrict our ability to seek expert advice or convert information to a format that provides accessibility to the requested information.



When information is not provided within 30 days, AscendantFX will notify you in writing that an extension has been taken, the reasons for the extension, and your ability to challenge the basis of the extension.

If a request is refused, in whole or in part, AscendantFX will notify you of the reasons for the refusal.

### **Keeping Your Personal Information Accurate**

AscendantFX will make reasonable efforts to ensure that the personal information you provide to us remains as accurate, complete and current as possible for the purpose for which it was collected. In some instances, we ask for your assistance in keeping your information up to date, such as in the case of your address and telephone number. From time to time, we may be required to update your personal information to comply with the Proceeds of Crime (Money Laundering) Terrorist Financing Act and its regulations. Keeping your information accurate and current will help us provide you with the best possible service.

If you become aware of information about yourself that is not accurate, please advise us. We will make corrections and, in some cases, inform others to whom the information may have been disclosed.

### **Retention**

AscendantFX will retain personal information for as long as is necessary for the identified purposes, or as required by legislative and legal requirements. The retention periods for certain information may vary depending on the legal requirements for that information.

When personal information is no longer needed, the information will be destroyed, erased or made anonymous in accordance with the minimum and maximum retention periods and other guidelines and procedures as set out in policy or legislation.

### **Online Activities**

Some of AscendantFX's services are made available to you using online services on our website. If you provide personal information using these online services or by other electronic means, the information will be collected, used and disclosed in accordance with this policy.



We use this information to ensure that our web services are functioning properly and to provide aggregate statistics about use of the site for marketing purposes.

For the same reasons, we may collect information about your use of the site using a “cookie” file. A cookie is a small file containing information that is created when you visit a website. Cookies and other technologies give us the capability to monitor the use of our site and continually improve the design and functionality to provide better service to you. A cookie can track how and when you use the site, which you visited immediately before, and store that information about you so that you can be identified when you return to the site.

You may restrict the acceptance of cookies through your browser settings, but this may limit your ability to use the full functionality of the site. Unless you have changed your browser settings to refuse cookies, our site will issues cookies when you use the site or log on for certain services.

### **Your Marketing Preferences**

From time to time we may contact you by phone, mail or email to inform you of products and services that may be of interest. We do not share your personal information with third party organizations so that they can market their products to you.

If you do not want to hear from us about our products and services, you may choose to opt-out of receiving marketing offers. To do so, please contact us by phone at +1 (877) 452-7183, by email at [privacy@ascendant.world](mailto:privacy@ascendant.world) or by mail to:

#### **Office of Chief Compliance Officer:**

AscendantFX Capital Inc.  
737 Yates Street, Suite  
514 Victoria, BC V8W 1L6  
Canada

Your marketing preferences will remain in effect until you tell us otherwise.

### **Change of Privacy Policy**

From time to time, AscendantFX may make changes to this policy. We encourage you to check back to this page on a regular basis to take notice of any changes.

This policy was last update on February 21, 2017.



### **Comments and Feedback**

If, at any time you have concerns or feedback regarding our privacy policy or our privacy practices, please contact our privacy manager at [privacy@ascendant.world](mailto:privacy@ascendant.world) or contact the office of the Chief Compliance Officer: +1.877.452.7183