



Endeavor Trust Corporation (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our notice, or our practices with regards to your personal information, please contact us at [info@endeavortrust.com](mailto:info@endeavortrust.com).

This privacy notice applies to all information collected through our services. We do not collect your personal information through our website. When you use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We invite you take some time to read through it carefully, as it is important. We welcome any questions you may have about your particular circumstances.

## Privacy Principles

Our protection of your personal information is guided by the following principles:

### 1. Accountability

We are responsible for personal information under our control or in our custody. Our Chief Risk and Compliance Officer is accountable for our compliance with the principles described in this privacy notice.

### 2. Identifying Purposes

The purposes for which personal information is collected will be identified by our representative at or before the time the information is collected. We do this explicitly or by implication where the purpose of using such information is reasonably apparent to you by virtue of its nature or the context in which it is being collected.

### 3. Consent

Your knowledge and consent, express or implied, are required for the collection, use or disclosure of personal information by us, except where otherwise required or permitted by law. You have the right to withdraw your consent to any collection, use or disclosure of your personal information at any time on reasonable written notice, subject to permitted or required exceptions under privacy laws. In some situations, withdrawal of consent may also deprive you of a benefit or service.

### 4. Limiting Collection

Personal information will be collected by fair and lawful means. We will limit the collection of personal information to that which is necessary for the purposes identified by us.



5. Limiting Use, Collection and Retention

We will use personal information for purposes for which it was collected, except with the consent of the individual or as required or permitted by law. We do not sell personal information to any organization or person for any reason. Personal information will be retained only as long as necessary for the fulfillment of those purposes or as required by law.

6. Accuracy

We aim to keep personal information current, accurate, and complete as is necessary for the purposes for which it is to be used.

7. Safeguards

We protect personal information with security safeguards appropriate to the sensitivity of the information.

8. Openness

We will make our policies and procedures with respect to management of personal information readily available to you and in a form that is generally understandable.

9. Individual Access

You can request access to your personal information by making a request in writing at any time. Your request must provide us with sufficient detail to enable us with reasonable effort, to identify you and your personal information. Upon receiving your request, we will inform you within thirty (30) days of the existence, use, and disclosure of your personal information, and you shall be given access to that information, except where the law requires or permits us to deny access.

If you find any errors in your personal information, please contact us as soon as possible, and subject to receipt of satisfactory evidence, we will make the corrections immediately.

10. Recourse

We ask that you to contact us with any questions or concerns you might have. We will investigate and respond to questions about any aspect of our handling of your personal information.

## **Collecting, Using and Disclosing your Personal Information**

### What Personal Information is collected?



The type of personal information we collect will depend on the service that we are providing to you. Personal information collected can include information establishing your identity (i.e., name, residential address, phone number, email address, date of birth, gender, identification documents); and information related to transactions arising from your relationship with us and/or our issuer clients.

#### How is your Personal Information obtained?

The information we collect about you is received from:

- you directly;
- parties (i.e., lawyers, brokers, issuers) in respect of transactions being undertaken by issuers of which you are a registered securityholder;
- persons authorized to act on your behalf under a power of attorney or other legal authority; or
- government agencies and public registries.

It is your decision as to whether to provide us with your personal information. Do be advised however, that we may be limited in how we service you should you not provide us with information needed to fulfill your request.

#### How is your Personal Information used?

We use personal information only for the reasonable purpose for which it was collected. Examples of how we use your personal information include:

- to verify your identity;
- to process and keep track of transactions;
- to help manage and assess our risks, operations and relationship with you;
- to comply with legal and governmental requirements; and
- to fulfill any other purpose for which you provide it or with your consent.

We do not share your non-public personal information with any third parties except as necessary to process a transaction or as permitted by law. Service providers with whom we share your personal information are legally bound not to disclose your personal information, except as permitted by law.

We may share your personal information with our employees who need this access in the course of their duties. On hire and annually thereafter, our employees sign a confidentiality pledge and an acknowledgement that they have read and understood our Code of Ethics Policy.



**ENDEAVOR TRUST CORPORATION**  
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Web: [www.EndeavorTrust.com](http://www.EndeavorTrust.com)

As our business grows, we may expand or sell our businesses under which the law permits us to disclose your personal information as a part of this business transaction. Should this occur, the receiving party must abide by our confidentiality agreement and subsequent to close, the relevant legislation(s) protecting your privacy.

### **Storage of your Personal Information**

The personal information you provide to us is stored on servers in Canada.

### **Monitoring of Telephone Calls and Video Surveillance**

We may record and monitor telephone calls and perform video surveillance of our office premises as permitted by law. Any such recordings are treated as confidential. We do this for training and quality assurance purposes, to detect and prevent fraud, and to ensure our contracts are enforced.

### **Your Comments**

If you have any comments or questions about this privacy notice or any other matter relating to your personal information, please contact us at:

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