



PRIVACY POLICY

As the global marketplace continues to expand, companies face increasingly strict privacy and data protection regulations. Within Canada, the Personal Information Protection and Electronic Documents Act (“PIPEDA”) seeks to ensure the protection and privacy of client data.

At The Northern Trust Company, Canada, The Northern Trust Company, Canada Branch and NT Global Advisors, Inc. (collectively “Northern Trust Canada”), we are dedicated to protecting your privacy and safeguarding your financial information. In fact, it is one of our highest priorities and remains one of the cornerstones of our commitment to you. When you choose to provide information to us, we use vigorous security safeguards and adhere to Ten Privacy Principles to ensure your personal and financial information is protected. These principles are based on PIPEDA and are the paramount of sound business judgment. Listed below are the Ten Privacy Principles and your rights under the new legislation and how we shall treat your data information.

- Principle 1 – Accountability
- Principle 2 – Identifying Purposes
- Principle 3 – Consent
- Principle 4 – Limiting Collection
- Principle 5 – Limiting Use; Disclosure and Retention
- Principle 6 – Accuracy
- Principle 7 – Safeguarding Client Information
- Principle 8 – Openness
- Principle 9 – Client Access
- Principle 10 – Handling Client Complaints and Suggestions

Principle 1 – Accountability

Northern Trust Canada is responsible for maintaining and protecting client information under its control. In fulfilling this mandate, Northern Trust Canada is required to designate an individual who is accountable for that Companies' compliance with the Ten Privacy Principles.

Principle 2 - Identifying Purposes

The purpose for which client information is collected shall be identified before or at the time the information is collected.

Principle 3 - Consent

Knowledge and consent of the client is required for the collection, use or disclosure of client information except where required or permitted by law.

Principle 4 - Limiting Collection

Client information collected must be limited to those details necessary for the purposes identified by Northern Trust Canada. Information must be collected by fair and lawful means.

Principle 5 - Limiting Use, Disclosure and Retention

Client information may only be used or disclosed for the purpose for which it was collected unless the client has otherwise consented, or when it is required or permitted by law. Client information may only be retained for the period of time required to fulfill the purpose for which it was collected.



Principle 6 - Accuracy

Client information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 - Safeguarding Client Information

Client information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 - Openness

Northern Trust Canada is required to make information available to clients concerning the policies and practices that apply to the management of their information.

Principle 9 - Client Access

Upon request, clients will be informed of the existence, use and disclosure of their information, and shall be given access to it. Clients may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate.

Principle 10 - Handling Client Complaints and Suggestions

Clients may direct any questions or enquires with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy at Northern Trust Canada.

If you should have any further questions with regard to Privacy and data protection, please do not hesitate to contact the undersigned.

Respectfully yours,

Arti Sharma
President & CEO
The Northern Trust Company, Canada

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