

Manitouinvestment.com (the "Site") is owned and operated by Manitou Investment Management Ltd. Manitou Investment Management Ltd. can be contacted at:

Purpose

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site of the following:

1. The personal data we will collect;
2. Use of collected data;
3. Who has access to the data collected;
4. The rights of Site users; and
5. The Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

Consent

By using our Site users agree that they consent to:

1. The conditions set out in this Privacy Policy; and
2. The collection, use, and retention of the data listed in this Privacy Policy.

Personal Data We Collect

We only collect data that helps us achieve the purpose set out in this Privacy Policy. We will not collect any additional data beyond the data listed below without notifying you first.

Data Collected in a Non-Automatic Way

We may also collect the following data when you perform certain functions on our Site:

1. First and last name;
2. Email address;
3. Phone number; and
4. Auto fill data.

This data may be collected using the following methods:

1. Filling out the "Contact Us" form.
 2. Entering the "Client Portal" application.
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How We Use Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

The data we collect automatically is used for the following purposes:

1. Analytics.

The data we collect when the user performs certain functions may be used for the following purposes:

1. Communications.
2. Logging into the Manitou Client Portal.

Who We Share Personal Data With

Employees

We may disclose user data to any member of our organization who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

Other Disclosures

We will not sell or share your data with other third parties, except in the following cases:

1. If the law requires it;
2. If it is required for any legal proceeding;
3. To prove or protect our legal rights;
4. To buyers or potential buyers of this company in the event that we seek to sell the company; and
5. To professional advisors acting as service providers to us in relation to the site or services – including IT professionals, auditors, lawyers and insurers who provide consultancy, legal, insurance and accounting services.

If you follow hyperlinks from our Site to another site, please note that we are not responsible for and have no control over their privacy policies and practices.

How Long We Store Personal Data

User data will be stored until the purpose the data was collected for has been achieved. You will be notified if your data is kept for longer than this period.

How We Protect Your Personal Data

In order to protect your security, we utilize Squarespace's strongest available browser encryption who also stores all of our data on servers in secure facilities. All data is only accessible to employees of Manitou Investment Management Ltd. Our employees are bound by strict confidentiality agreements.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times and therefore, we are unable to guarantee the security of user data beyond what is reasonably practical.

Children

We do not knowingly collect or use personal data from children under 13 years of age. If we learn that we have collected personal data from a child under 13 years of age, the personal data will be deleted as soon as possible. If a child under 13 years of age has provided us with personal data their parent or guardian may contact our privacy officer.

How to Access, Modify, Delete, or Challenge the Data Collected

If you would like to know if we have collected your personal data, how we have used your personal data, if we have disclosed your personal data and to who we disclosed your personal data, or if you would like your data to be deleted or modified in any way, please contact our privacy officer here:

James Meadows

info@manitouinvestment.com

416.865.1867

150 King Street West Suite 2003

P.O. Box 31 Toronto, ON M5H 1J9

How to Opt-Out of Data Collection, Use or Disclosure

In addition to the method(s) described in the *How to Access, Modify, Delete, or Challenge the Data Collected* section, we provide the following specific opt-out methods for the forms of collection, use, or disclosure of your personal data:

1. You can opt-out of the use of your personal data for marketing emails or choose not to provide your information by not submitting a form response. You can opt-out by clicking "unsubscribe" on the bottom of any email or updating your email preferences.

Cookie Policy

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We use the following types of cookies on our Site:

1. Analytical cookies
Analytical cookies allow us to improve the design and functionality of our Site by collecting data on how you access our Site, for example data on the content you access, how long you stay on our Site, etc.

Modifications

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

Contact Information

If you have any questions, concerns or complaints, you can contact our privacy officer, James Meadows, at:

info@manitouinvestment.com

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