



## **PINESTONE – Website Privacy Policy**

*Last Updated May 12, 2023.*

PineStone Asset Management Inc. (“**PineStone**”) respects your privacy and is committed to protecting your personal information. This privacy policy (“**Privacy Policy**”) will inform you as to how we look after your personal information when you visit our Website at [www.pinestoneam.com](http://www.pinestoneam.com) (the “**Website**”), regardless of where you visit or use from, and when you use our products and services. This privacy policy tells you about your privacy rights and how the law protects you.

By submitting personal information to PineStone or its service providers and agents (collectively referred to as PineStone, “**we**”, “**us**” or “**our**” in this Privacy Policy), you agree that we may collect, use and disclose such personal information in accordance with this Privacy Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting our privacy manager. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.

PLEASE REVIEW THIS PRIVACY POLICY BEFORE USING THIS SITE. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, DO NOT USE THE SITE. THIS PRIVACY POLICY GOVERNS THE USE OF THIS SITE AND APPLIES TO ANY PERSONAL INFORMATION YOU MAY SUBMIT TO US THROUGH THIS SITE. BY SUBMITTING ANY PERSONAL INFORMATION TO THIS SITE, YOU AGREE TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY.

Your use of our Website and our products and services, and the terms of this Privacy Policy, are also subject to the Terms of Use. Please review those Terms of Use for additional detail regarding your use.

### **1. WHO WE ARE**

PineStone is a company based in Canada. We are a specialist global equity manager fund and attach a great importance to the confidentiality and security of the personal information provided by to us by our clients and employees.

PineStone collects and processes personal information through our Website, which offers a platform for the public to discover our products and services and to interact with us. PineStone collects and processes the visitors’ information when visitors sign up for newsletter, contact PineStone, or apply for a job with us.

### **2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?**

Personal information means any information about an individual from which that person can be identified. It does not include personal information where all references to the identity of the relevant individual have been removed (anonymous personal information).



We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity personal information** includes first name, last name, title, company you work for, and in the case of individuals representing companies using our products and services, your job title, role and/or level of experience
- **Contact personal information** includes address, email address and telephone numbers.
- **Technical personal information** includes internet protocol (IP) address, browser type and version used to view our Website, the pages visited on our Website, any referral websites, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage personal information** includes information about how you use our Website, our products and our services.
- **Marketing and communications personal information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share aggregated personal information such as statistical or demographic information for any purpose. Aggregated personal information could be derived from your personal information but is not considered personal information in law as this information will not directly or indirectly reveal your identity. For example, we may aggregate your usage personal information to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect aggregated personal information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

If you provide PineStone with personal information of another individual, you represent that you have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

Our Website is not intended for children under the age of 18 and we do not knowingly collect personal information relating to children. No portion of the Website is directed at children nor are children encouraged to use the Website. PineStone does not knowingly solicit any personal information about children.

### 3. **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**



We use different methods to collect personal information from and about you including through:

(a) **Direct interactions.**

You may give us your identity, contact, transaction, and financial personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

- (i) Subscribe to our newsletter;
- (ii) Contact us or provide feedback;
- (iii) Request marketing to be sent to you;
- (iv) Apply for a job opportunity with us; or
- (v) Ask us for technical support or customer services.

(b) **Automated technologies or interactions.**

As you interact with our Website, we will automatically collect technical and usage personal information about your equipment, browsing actions and patterns, and your access to our products and services. We collect this personal information by using cookies, pixels, server logs and other similar technologies. We may also receive technical personal information about you if you visit other websites employing our cookies.

Generally speaking, you may visit the Website while remaining anonymous and not reveal any personal information other than the information you have already provided directly to us. PineStone uses your IP address to help diagnose problems with the Website servers, to administer the Website, to monitor Website and to gather broad geographic information. Your IP address is used to help identify you and to aid in your navigation through the Website as determined by your customization options, if any. PineStone also may aggregate your IP address with other information to create anonymous Website statistics.

Our Website also uses “cookies” to provide customization options at login, or to keep track of where you are in the Website in order to provide the correct customization options when you use the Website. PineStone also uses cookies to allow you to use features or services that you decide to select, or to keep track of usage of products and services or links provided on the Website. PineStone does not, however, use cookies to collect personally identifiable information about you.

You may set your browser to decline cookies. Although in most cases you may refuse cookies and still fully navigate our Website.



#### 4. **WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where you consent to such collection and use, such as by consenting to this Privacy Policy.
- Where needed to perform the service you are requesting.
- Where we need to comply with a legal obligation.

Note that we may process your Personal information for more than one lawful basis depending on the specific purpose for which we are using your personal information. Please contact us if you need details about the specific legal ground we are relying on to process your Personal information.

##### (a) Purposes for which we will use your personal information

PineStone may use personal information you submit through the Website to provide the services and information you select, to better understand its customers, to provide better products and services, to contact you when you request to be contacted, to assist PineStone with administration such as with troubleshooting any problems and for any purposes deemed necessary or required by PineStone to enforce the Terms of Use and other terms or conditions applicable to any portion of the Website, including to evaluate our products and services.

If you so request, PineStone may use this information to send you information about PineStone, or other topics PineStone thinks may be of interest to you, such as product information or updates. If you so request, PineStone may also use this information to connect you with our corporate partners for recruitment and business referral purposes.

If you decline to receive information or unsubscribe from our newsletter, PineStone will retain your personal information only as long as necessary for the fulfillment of the purposes for which it was initially collected as described herein, unless it is required or authorized by law to retain the information for a longer period, including without limitation where necessary for the resolution of any open issues that may exist after you have declined to receive information or about any issues relating to the Terms of Use, this Privacy Policy, or any other policy then in-effect.

PineStone may aggregate all information provided by you to create anonymous statistical data. This anonymous data helps PineStone to understand and know its customer base better. That anonymous data may be provided to third parties but never in such a fashion as to identify you personally.

##### (b) Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.



(c) Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**5. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

Other than as provided below, PineStone does not disclose or sell to third parties information you have submitted to our Website that identifies you personally.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

(a) Third Party Services

Even though users of this website can visit without informing PineStone who they are and without revealing information about themselves, in accessing the Website, there is an automatic exchange of information between the user's computer and PineStone's Website and its hosting solution.

On occasion, PineStone may offer in conjunction with third parties certain services, which may require you to share your personal information with that third party as a condition for providing that service. While PineStone will treat any information it receives in accordance with this Privacy Policy, PineStone will not be responsible for the information submitted by you to that third party, and PineStone reminds you to review the applicable rules and any third party's applicable privacy policies separately before participating in such service.

(b) Corporate Partners

If you so request, PineStone may share your personal information such as your contact information and project experience with our select corporate partners for recruitment and business referral purposes.

(c) Law Enforcement

To the extent permitted by applicable privacy legislation, PineStone may provide information you submit to this Website to law enforcement authorities. As noted in the Terms of Use, PineStone intends to



cooperate with any order or request from law enforcement officials or a court of competent jurisdiction for information as to the identity of individuals submitting or posting information to PineStone, on this Website.

## **6. INTERNATIONAL TRANSFERS**

By providing us with personal information, you acknowledge and agree that your personal information may be processed and stored in other countries, including in our servers located in the United States and other jurisdictions, where laws regarding processing of personal information may be less stringent than the laws in your country. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information. This will include putting appropriate contractual safeguards in place to ensure an adequate level of protection for the personal information. Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Canada.

## **7. HOW DO WE PROTECT THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION?**

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse, or alteration.

We have implemented information security policies, rules and technical measures that are intended to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our employees, workers and personal information processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Website.

This Website has security measures in place to protect against the loss, misuse and alteration of the information under PineStone's control. PineStone uses standard internet connections for the Website.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## **8. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?**

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your personal information: see your legal rights Section for further information.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Subject to certain exemptions, you have the following rights in relation to the personal information we hold about you:

### **(a) Your right of access**

If you ask us, we will confirm whether we're processing your personal information and, subject to any applicable exemptions, provide you with a copy of that personal information within the timescales provided for by law. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If you require additional copies, we may need to charge a reasonable fee.

### **(b) Your right to rectification**

If the Personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly. You may find further information on how to change, update or delete your information in the section on "Your right to erasure."

### **(c) Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not



be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to no longer receive future communications from PineStone, you may do so through any of the methods described below. Please note that it may take us a reasonable amount of time to process your request.

- A particular service may have an Administration section that allows you to change any previous selections for that service.
- You can contact us <https://PineStoneam.com/contact> for assistance in changing your prior selections.

#### 10. **CONTACTING US**

We have appointed a privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise *your legal rights*, please contact our privacy manager using the details set out below.

If you have any questions about this Privacy Policy or our privacy practices, please contact our privacy manager in the following ways:

Chief Compliance Officer (Person Responsible for Protection of Personal Information)  
PineStone Asset Management Inc.  
1981 McGill College Avenue Suite 1600  
Montréal, QC H3A 0P5

You may also consult other methods of contacting us, including an online contact form.

You have the right to make a complaint at any time to the relevant supervisory authority for personal information protection issues. In Canada, you can contact the Office of the Privacy Commissioner of Canada (“OPC”), or the relevant provincial privacy commissioner for your province of residence. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

#### 11. **Changes to this Policy**

If and when PineStone makes changes to this Website, PineStone may have to update this Privacy Policy to better reflect those changes. But no update to this Privacy Policy will, in itself, alter the choice you already made about how PineStone can use your personal information without your consent (except where legally permitted). Because changes to this Website or updates to this Privacy Policy may occur, you should review this Privacy Policy from time to time. Remember, your decision to continue using this Website after this Privacy Policy is updated will signify that you have agreed to any new Privacy Policy terms.





12. **Language**

The French version of this Privacy Policy is available at: <https://pinestoneam.com/pdf/politique-de-confidentialite.pdf>