

PRIVACY POLICY

In the normal course of OTT's business operations, individuals seeking to access its products and services are required to provide OTT with certain personal, factual or subjective information about them. In plain language, this is any information that can be used to identify you individually and contact you. It includes, but is not limited to, personal and financial details such as name, address, age, citizenship, ID numbers, income, net worth, credit and employment history, etc. (herein collectively referred to as "personal information").

Under [The Personal Information Protection and Electronic Documents Act \(PIPEDA\)](#), OTT must obtain your consent when it collects, uses, or discloses your personal information. You may withdraw your consent at any time, but please note that it may affect our ability to continue providing you with the products and services that you have or would like to receive.

You have a right to access your information held by OTT and to challenge its accuracy. Personal information can only be used for the purposes for which it was collected. If OTT is going to use it for another purpose, consent must be obtained again.

We respect and protect the privacy of every former, current and prospective client. We encourage you to read this Privacy Policy which describes OTT's personal information handling practices which will help you understand how we protect, collect, use and disclose your information; and your right to correct and access your information.

CHANGES TO THE PRIVACY POLICY

This Privacy Policy may be amended from time to time. You are provided with this [Privacy Policy Statement](#) when you open your account at OTT. The current version will always be available on our website.

PERSONAL INFORMATION COLLECTED BY OTT

OTT limits the collection of your personal information to what we actually need to set up and service your account; and meet our legal and regulatory obligations. Your personal information is collected from:

- New Account Application Form (NAAF) and other client forms that provide us with your
 - preference of account, trading and platform type;
 - personal, financial, employment and banking details;
 - investment objectives and knowledge, trading experience and risk tolerance;
 - stated risk capital limit; and
 - politically exposed person status.
- Client account activity reports that provide us with your
 - account number;
 - account balance;
 - trade transactions; and
 - account equity.
- Third-party credit rating agencies that provide us with your
 - credit reports; and credit scores.
- "Cookies" embedded in the OTT website that provide us with your web browsing activity.

HOW OTT USES CLIENT PERSONAL INFORMATION

OTT uses your personal information to:

- verify your identity in compliance with [FINTRAC Know Your client Requirements](#) when opening your account; and fulfill our Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) obligations of the [Proceeds of Crime \(Money Laundering\) and Terrorist Financing Act](#);
- perform our know-your-client (KYC) and suitability obligations in compliance with [National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations \(NI 31-103\)](#);
- obtain your consent to receive our commercial electronic messages (CEMs) in compliance with [Canada's Anti-Spam Legislation](#);
- allow our service provider or carrying broker to process the transferred data and perform services on our behalf under written agreements which restrict use of personal information to the limited purposes for which it is provided to them and prohibit further use or disclosure except as permitted by law;
- complete bank deposits and withdrawals;
- process and confirm your requests, orders and transactions; and
- continue to service your account with OTT.
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Personal information collected from different sources may be consolidated and saved on our servers. OTT does not disclose, sell or make available any personal information about its former, current or prospective clients to any third parties except as stated in this Policy.

Personal information may be transferred across national and provincial borders for the purposes of data consolidation, storage, management and reporting as required under written agreement with our service provider or carrying broker and our trade repository; and may be accessible to law enforcement agencies, provincial securities commissions, self-regulatory organizations and foreign securities regulators, as described below.

DISCLOSURE OF CLIENT PERSONAL INFORMATION

OTT may disclose personal information of former, current or prospective clients to affiliated and non-affiliated third-party entities such as:

- OTT's agent, service provider or carrying broker in the ordinary course of business and for the purpose of providing you with the products and services requested by you;
- OTT's affiliates who are permitted to disclose and use the information only to the extent that OTT may disclose and use the information under this Policy;
- our legal counsels, accountants and auditors in the ordinary course of business;
- persons holding a legal or beneficial interest, and persons acting in a fiduciary, representative, or power-of-attorney capacity relating to a client account;
- third-party credit rating agencies;
- Canadian or foreign government, regulatory or law enforcement agencies to comply with applicable legal requirements of civil, criminal or regulatory investigations, or judicial process, subpoena, summons or warrant to protect against actual or potential fraud, unauthorized transactions, claims or other liability.

Provincial securities commissions and self-regulatory organizations including the [Investment Industry Regulatory Organization of Canada](#) and the [Canadian Investor Protection Fund](#) may require access to personal information of former and current OTT clients, for the following regulatory purposes:

- surveillance of trading-related activity;
- regulatory audits of financial and business conduct compliance;
- investigation of allegations of regulatory and statutory violations,
- management of regulatory databases;
- enforcement or disciplinary proceedings;
- reporting to securities regulators, or
- information sharing between securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the preceding purposes.
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PERMISSION TO COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

Except as permitted in this Privacy Policy, OTT will not share your personal information with any non-affiliated third-party entities without your prior written consent or providing you with an opportunity and instructions on how to opt out.

CONSENT TO COMMUNICATIONS

By providing us with your contact information, you agree to allow us to contact you via email, mail, phone, or pre-recorded voice messages about our products, services, promotions, and information about the products, services, and promotions of our selected partners.

WITHDRAWING CONSENT

You may withdraw your consent to receive communications, have your information collected, used, and disclosed at any time, but please note that it may affect our ability to continue providing you with the products and services that you have or would like to receive. If you wish to withdraw your consent to the collection, use or disclosure of your personal information; or you do not wish to receive information about our current and future product offerings, special promotions or other services, please contact us at 1-800-806-0667 or privacy@otffx.com.

PROCEDURES TO SAFEGUARD PERSONAL INFORMATION

OTT has implemented Privacy Procedures to safeguard the personal information of its clients in both physical and electronic forms. We restrict access to personal information to only those employees on a need-to-know basis to provide you with our products or services. We maintain physical, electronic and procedural controls to safeguard personal information.

We protect your account information by keeping it on secure servers, using firewalls and other security technology to protect our network and systems from external attacks, and by requiring clients to enter a unique user ID and password to access trading systems. We conduct periodic internal audits of our business practices and procedures, examining our internal controls, security protocols and information access policies, in order to best protect the personal information of our clients.

You should note that PIPEDA does not prohibit OTT from a cross-border transfer of your personal information to a service provider for processing in a foreign jurisdiction. OTT has assessed the risks to your personal information when it is transferred to a third-party service provider operating outside of Canada, where it may be accessed by the courts, law enforcement and national security authorities.

OTT is accountable for the protection of your personal information in the hands of its service providers. We have reviewed the privacy policy, procedures and employee training programs of the third-party processor under contract to us and are reasonably assured that its personal information handling practices adequately safeguard your information in a manner comparable to how it would be protected at OTT. We have a contractual right to audit and inspect how the third party handles and stores personal information, and will exercise the right to audit and inspect at least annually during our due diligence visit to our service provider, or when warranted.

RETENTION OF PERSONAL INFORMATION

OTT will retain your personal information for only as long as necessary for the identified purposes or as required by law and securities regulation. We will use care in the disposal, destruction, or de-identification of personal information to prevent unauthorized parties from gaining access.

USE OF COOKIES

OTT uses cookies and other tracking mechanisms to enhance the user experience of its website by customizing features to store your preferences and avoid re-entry of data; to facilitate your use of mobile applications; to enable us to conduct research and analysis on web metrics and to offer, and track responses to, on-line promotions.

Cookies stored on the visitor's web browsers by OTT are not shared with third parties. You can opt out of accepting these cookies by resetting your browser preferences.

Third-party vendors who advertise on the OTT web pages may use cookies to collect your details and other data on website visits in order to market or promote goods and services of particular interest to you. The Network Advertising Initiative provides information on this practice and how to opt out at http://www.networkadvertising.org/managing/opt_out.asp. The Google ad and content network privacy policy accessible at http://www.google.com/privacy_ads.html provides information on Google's DoubleClick DART cookie opt-out.

LINKS TO NON-OTT WEBSITES

Links to third-party websites on the OTT website are for client convenience and easy access to information. Once you access those links you will leave the OTT website and be re-routed to the third-party website. We do not control third-party sites or their privacy practices, which may differ from our own policies. We make no endorsement, representation or warranty about third-party websites. The personal data that you choose to provide third parties is not covered by this OTT Privacy Policy.

You should review the privacy policy of any third-party website before submitting your personal data. Some third-party entities may choose to share your data with OTT in which case your personal data will be governed by the privacy practices of the disclosing third-party entity.

NOTIFICATION OF POLICY AND POLICY CHANGES

The Privacy Officer is responsible for ensuring that every client opening a new OTT trading account is provided with this Privacy Policy. Changes or updates to the policy or procedures regarding our personal information handling practices; privacy breach risk mitigation and containment measures are posted on our website.

This Privacy Policy may be updated from time to time. The current version of this Privacy Policy is available with our account opening documents and on the OTT website. You are responsible for regularly reviewing this policy. If you use this website or other service we provide after any changes are made and published, that will constitute your agreement to those changes.

ACCURACY AND ACCESS TO YOUR PERSONAL INFORMATION

You are encouraged to inform us of any changes to your information, because it is important that the personal information that you have provided us is accurate, complete and up to date. Please direct all privacy-related enquiries to: privacy@otffx.com or

Privacy Officer
OTT Financial Canada Inc.,
5140 Yonge St., Level 5,
North York, Ontario M2N 6L7
Tel: 1-800-806-0667

You may also, at any time, contact our Privacy Officer to request access to your personal information, verify its accuracy and, if required, correct it. OTT will provide you with access to your personal information except where we are prohibited by law from doing so, or are permitted by law to restrict your access and have legitimate reasons for doing so.

Client Name
(Primary Account Holder)

Client Name
(Joint Account Holder)

Client Signature

Client Signature

Date (mm/dd/yy)

Date (mm/dd/yy)