

# Privacy Policy

## **Trader ii Securities Services and Software Inc.**

The Personal Information and Protection of Electronic Documents Act (PIPEDA) was introduced and became effective January 1, 2001 as amended. PIPEDA and similar provincial privacy statutes govern the collection, use and disclosure of personal information by all types of private businesses. PIPEDA and its provincial equivalents create mandatory obligations and therefore every business is required to comply with this legislation.

This policy applies to customers, representatives and other persons who provide personal information to the Company directly or indirectly through verbal, written or electronic correspondence.

### **Accountability**

Trader ii is responsible for personal information under our control. The Company has designated the office manager to act as the privacy officer. The privacy officer is responsible for the Company's compliance with this policy.

### **Purposes for Collection**

Trader ii respects your right to privacy and to the protection of your personal information.

The Company does not sell or share your information with anyone. We only collect your personal information for the following purposes:

- to obtain information about your use of this website so that we may improve its usability and functionality;
- for the purpose of registering and subscribing to the software application and website services;
- to assist with information about transactions carried out using this software application;
- to assist with historical information for tax purposes up to, but not limited, to seven years;
- to enable communication;
- to process payment for the software;
- to assist with any internal or external training needs.

In addition to the disclosures reasonably necessary for the purposes identified elsewhere above, Trader ii may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

Where personal information is disclosed to third parties for any purposes noted above, Trader ii will make all reasonable efforts to ensure there are appropriate security measures in place for any personal information being provided.

## **Consent**

Unless we receive written correspondence from the customer, their use of our website and software application constitutes consent for the Company to acquire, collect, use and disclose personal information for the purposes stated in this Policy.

Information that Trader ii collects may be stored and processed in and transferred between any of the countries in which Trader ii operates to enable the use of the information in accordance with this privacy policy. Your use of our website and software application constitutes consent for the Company to store your personal information between any of the countries in which Trader ii operates.

The customer may withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The customer decides to provide (or not provide) the Company with personal information. However, it is important for the customer to note that their decision to withhold certain information may impact our ability to provide full access to the software application or to correspond with them. The customer may refuse or withdraw their consent by contacting the Company.

## **Limiting Collection, Use, Disclosure and Retention**

The Company collects personal information only for the purposes identified above. The Company does not use or disclose personal information for any purpose other than those for which it was collected, except with the customer's consent or as required by law. We do not sell, lease, or trade information about our customers to other parties. Personal information is retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law.

## **Accuracy**

The Company will make all reasonable efforts to ensure that personal information is as accurate, complete and current for the purposes for which it was collected. Customers must make reasonable efforts to inform us of any inaccuracies or changes in personal information so that we can make the necessary corrections or amendments in a timely manner.

## **Safeguards**

The Company uses appropriate security safeguards to protect our customers' personal information from risks such as loss, misuse, unauthorized access, disclosure or alteration. Safeguards include physical, administrative, and electronic security measures.

Trader ii will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information. We will store all personal information you provide on its secure servers. Information relating to electronic transactions entered into via this website or software application will be protected by encryption technology.

All representatives of the Company are provided with a copy of our privacy policy and are required to abide by the standards we have in place. They are also required to work with moral and ethical behaviour and must follow applicable laws and regulations.

### **Access**

Any customer has the right to access their personal information under the control of the Company. Upon request in writing to the Company at the address listed below, the customer will be informed of the existence, use and disclosure of their personal information and will be given access to that information. In certain exceptional circumstances, the company may not be able to provide access to certain personal information it holds about a customer if doing so would reveal personal information about a third party. If access cannot be provided, the Company will notify the customer, in writing, of the reasons for the refusal or any exclusions to the information provided.

### **Revisions to this Privacy Policy**

The development of the Company's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements, we may revise this policy from time to time. Please ensure that you refer to the current version of the Company's privacy policy. The current version will be posted on our website. Please check this page periodically to ensure you are familiar with any changes.

### **Questions or Policy Compliance Concerns**

If you have a question regarding this policy, or a concern or complaint regarding the privacy practices of the Company, please contact the Privacy Officer through the information provided below.

For general questions regarding privacy regulations, please visit the Privacy Commissioner of Canada's website at [www.priv.gc.ca](http://www.priv.gc.ca).

### **Contact Trader ii**

If you wish to contact the Company:

email [privacyofficer@traderii.com](mailto:privacyofficer@traderii.com)

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