

AlphaFixe Capital Inc. Confidentiality Policy

ALPHAFIXE CAPITAL INC. (ALPHAFIXE) is committed to protect the confidential information of its clients and employees and to ensure the confidentiality of personal information provided to ALPHAFIXE in the course of our business.

Our files may contain both personal information and confidential information that do not fall under the definition of "personal information". Under all circumstances, it is understood that ALPHAFIXE shall protect the confidentiality of any information it is entrusted with.

This policy sets out our standards for collecting, using, disposing and storing the personal information of our clients and employees. This Policy also explains how we safeguard the personal information and the right to access that information by our clients and employees. The related procedures specify how it shall be applied.

Identifying Purposes

For Clients

The purpose of the collection and verification of information is twofold: to ensure that ALPHAFIXE's clients are protected by assisting them in determining investment objectives, risk tolerance, and suitability of investments, and to satisfy ALPHAFIXE's legal and regulatory obligations, including potential insider or control relationships, the prevention of possible money laundering, and tax reporting requirements.

For Employees

The personal information gathered shall be used for the employment contract between ALPHAFIXE and the employee.



Limiting Use, Disclosure, Retention

When personal information is collected from clients, it is to be retained for the period during which the clients maintain an account with ALPHAFIXE and for a period of time following the termination of the account, which is stipulated, by law or regulations. When personal information is no longer required, it is to be disposed in a secure manner.

The personal information collected from any employee will be retained for the period during which the employee is with ALPHAFIXE and for a period of time following the termination of the employment or contract as provided by law or regulations.

As a portfolio manager, ALPHAFIXE may in, certain cases, be required to make certain personal information of its clients and employees available to certain companies, governmental, regulatory and self-regulatory agencies and organizations. These entities are bound to ensure the confidentiality of the personal information provided by ALPHAFIXE. The communication of personal information shall be done with the consent of the individual unless required by law.

The personal information shall not be preserved for longer than needed for the established purposes. Thereafter it shall be disposed in a secure manner.

Responsibility

All employees of ALPHAFIXE are bound by this Policy and related procedures to ensure that the personal information of its clients remain confidential.

Accuracy

ALPHAFIXE is committed to maintaining accurate records of its clients' personal information. From time to time, ALPHAFIXE will request updated account documentation in order to ensure that the personal information is complete and accurate.



Safeguarding Client Information

ALPHAFIXE implemented and continues to maintain rigorous safeguards in order to ensure that the personal information remains confidential and is protected against loss or theft, as well as unauthorized access or disclosure.

Protection methods include limited access to the premises, technological measures such as off-site backups and archiving to protect personal information of its clients.

Right to Request Information

All clients and employees have the right to request any information we hold about them and to view this information. They also have the right to enquire on how we used it and to whom it may have been disclosed.

Queries regarding AlphaFixe's Privacy Policy and the assurance of the confidentiality of the personal information, if any, collected from clients and employees may be directed, in writing, to:

ALPHAFIXE Capital Inc.
c/o Privacy Officer
1800 McGill College
Suite 2420
Montreal, Quebec, H3A 3J6

Complaints and Concerns

A complaint concerning the protection of personal information should be addressed to the Privacy Officer at the address provided above.

