

Windsor Crescent Privacy Policy

This privacy policy (“**Privacy Policy**”) explains how Windsor Crescent (“**Windsor Crescent**”), an activity conducted within Tangerine Tango (“**Tangerine Tango**”), collectively hereinafter referred to as **Tangerine Tango**, with regard to its websites and services, collects, uses and discloses your personal data, and your rights in relation to the personal data it holds.

In this Privacy Policy, “us”, “we” and “our” refers to Tangerine Tango. Tangerine Tango is the data controller of your personal data and is subject to the data protection and compliance guidelines in Canada. Our data protection and compliance officer (“**Chief Compliance Officer**”) can be contacted at compliance@tangerine-tango.com.

This Privacy Policy may be amended from time to time, to reflect any changes in the way that Tangerine Tango process your personal data. This version of the Privacy Policy supersedes any previous versions.

1. USERS RIGHTS

Users have the following rights, to:

- obtain access to, and copies of, the personal data that we hold about you;
- require that we cease processing your personal data if the processing is causing you damage or distress;
- require us not to send you marketing communications;
- require us to erase your personal data;
- require us to restrict our data processing activities;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- require us to correct the personal data we hold about you if it is incorrect.

The above rights are not absolute and Tangerine Tango reserves the right to refuse requests, where exceptions apply.

If you have any questions about how Tangerine Tango uses your personal data, or you wish to exercise any of the rights set out above, please contact our Chief Compliance Officer as follows:

compliance@tangerine-tango.com

2. HOW TANGERINE TANGO COLLECTS DATA

You are not required to provide any personal information on the website you are viewing unless you are a client (“**Client**”) wishing to access a secure part of the website or the Tangerine Tango service. To do this you will enter your username and password or requisite access information. You may choose to enter your first name, surname and email address, or other such information, on the website, should you wish to receive select information.

3. THE CATEGORIES OF THE DATA TANGERINE TANGO COLLECTS

We may collect the following categories of personal data about you:

- your contact details and why you would like us to contact you;
- the types of marketing material you would like to receive and the means by which you wish to receive it;
- where you have been granted access to protected parts of our website or service offering, your log in information;

- technical information including the internet protocol (IP) address used to connect your computer to our website. An IP address is an assigned number similar to a telephone number, which allows your computer to communicate over the internet;
- information about your visit to our websites that is provided by cookies. Our cookie Policy provides information on how cookies are used on our websites and how you can control these cookies.

4. THE BASIS FOR PROCESSING YOUR DATA, HOW WE USE THAT DATA AND WHO WE SHARE IT WITH

We may process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

Accordingly, we may use personal data:

- to prepare a Proposal for you regarding the services we offer;
- to deal with any complaints or feedback you may have; and / or
- for any other purpose for which you provide us with your personal data.

Accordingly, we may share personal data with the following:

- your advisers,
- our advisers where it is necessary for us to obtain their advice or assistance; and / or
- our data storage providers.

We may also process your personal data because it is necessary for our legitimate interests.

Accordingly, we may use personal data for the following:

- the administration and management of our business; and / or
- seeking advice on our rights and obligations, such as where we require our own legal advice.

Accordingly, we may share personal data with the following:

- our advisers or agents where it is necessary for us to obtain their advice or assistance; and / or
- with third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.

We may also process your data for our compliance with a legal obligation which we are under.

Accordingly, we may use your personal data for the following:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws.

Accordingly, we may share personal data with the following:

- our advisers where it is necessary for us to obtain their advice or assistance;
- our auditors where it is necessary as part of their auditing functions; and / or
- with relevant regulators or law enforcement agencies where we are required to do so.

5. WHERE WE NEED YOUR CONSENT TO PROCESS YOUR DATA

Where you have indicated that you wish to receive marketing material, we may send to you marketing material of the type you have indicated via the methods you have selected. Where you wish to withdraw your consent at any time, you may do so using the unsubscribe facility which is provided with all marketing material.

You may also contact our Chief Compliance Officer at compliance@tangerine-tango.com should you wish to withdraw your consent. We may share your first name, surname and email address with 3rd party systems, who we may use to assist with distributing our marketing material.

6. SAFEGUARDS

We safeguard the personal information you provide to us by centralizing data storage in a secure environment, controlling access by employees, using consistent configuration and monitoring of the IT environment, using a selection of tools to ensure timely response to vulnerabilities identified by software vendors. In addition, we have active firewall management, centrally managed anti-virus and malware software and ongoing vulnerability assessments in place, as well.

7. SHARING OF DATA

We may need to transfer your personal information to other Group companies which provide the same or a similar level of protection for your personal data as outlined and provided herein. We may also share your personal data with Group companies or services providers located in countries which do not have laws which provide the same level of protection to your personal data as outlined and provided herein. In such circumstances we use data sharing arrangements to safeguard your information.

8. RETENTION OF YOUR DATA

Tangerine Tango will retain your personal information for as long as necessary and permitted for legal, regulatory, and legitimate business purposes. After this period, personal data will be deleted.

Any questions, requests or complaints can be directed to the address below.

Windsor Crescent
C/O Tangerine Tango Advisory Services Inc.
C/O Weir Foulds LLP
Toronto Dominion Centre
66 Wellington St W Suite 4100,
Toronto, ON, M5K 1B7, CANADA

Phone: (416) 365-1110
Attention: David Brown