



Privacy Policy Summary

IGM Financial Inc.

Investors Group Inc.

Mackenzie Financial Corporation

Investment Planning Counsel Inc.

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Table of Contents

1. Purpose and Scope	3
2. Background	3
3. Definitions.....	3
4. Fair Information Principles.....	3
Principle 1 – Accountability.....	3
Principle 2 – Identifying Purposes.....	4
Principle 3 – Consent	4
Principle 4 – Limiting Collection.....	5
Principle 6 – Accuracy.....	5
Principle 7 – Safeguards.....	5
Principle 8 – Openness	6
Principle 9 – Individual Access	7
Principle 10 – Challenging Compliance	7
5. Breach of Security Safeguards.....	8
6. Privacy Notices	8

1. Purpose and Scope

The purpose of the IGM Privacy Policy Summary (the “Policy”) is to provide information on how IGM Financial Inc. (“IGM”), which includes Investors Group Inc. (“IG”), Mackenzie Financial Corporation (“Mackenzie”), Investment Planning Counsel Inc. (“IPC”) and their respective subsidiaries (collectively the “IGM Companies”) operate in compliance with applicable federal and provincial privacy legislation.

IGM is committed to the protection of the Personal Information of its Clients.

2. Background

IGM Companies adhere to the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”), as well as Alberta’s *Personal Information Protection Act*, British Columbia’s *Personal Protection Act*, and Quebec’s *Act Respecting the Protection of Personal Information in the Private Sector* (collectively “Provincial Privacy Legislation”). Provincial Privacy Legislation applies to Personal Information of Clients who reside in those provinces. IGM Companies located outside Canada are subject to local privacy legislation in their jurisdiction.

PIPEDA came into effect for Canadian private sector organizations in 2004, and regulates how organizations collect, use and disclose personal information in their commercial activities. The purpose of PIPEDA and Provincial Privacy Legislation is to establish rules for the handling of Personal Information in a manner that recognizes an individual’s right to privacy of their Personal Information, and an organization’s need to collect, use and disclose personal information for legitimate business purposes.

3. Definitions

“**Client**” means any individual about whom IGM Companies collect and maintains Personal Information, including but not limited to current, former and prospective clients.

“**Personal Information**” means any information about an identifiable individual. It includes but is not limited to name, date of birth, address, telephone number, social insurance number, banking information, income, assets, occupation and any other know-your-client information.

4. Fair Information Principles

PIPEDA establishes ten key principles for the protection of Personal Information, which IGM has incorporated into the Policy.

Principle 1 – Accountability

IGM and the IGM Companies are responsible for Personal Information in their possession, including information that is received from and/or transferred to third party service providers for processing.

Designated Privacy Officers

Each IGM Company has designated a Privacy Officer to oversee the Policy across the organization. The Privacy Officers may delegate certain functions to other individuals in the IGM Companies’ compliance departments.

IGM Personnel

IGM Personnel are responsible for protecting the Personal Information of Clients, and shall:

- Access Personal Information only as required to fulfill the duties of their role;
- Be accountable for the Personal Information they collect and ensure it is collected, used, and disclosed in compliance with applicable policies and procedures;
- Maintain the confidentiality of all Personal Information to which they have access, even after they leave IGM;
- Seek consent from the Client (for collecting, using, and disclosing Personal Information) in such a way so that the Client can reasonably understand how the Personal Information will be used and disclosed; and
- Use Personal Information only for its intended purpose as disclosed to the Client;
- Keep records of Personal Information disclosure where required; and
- Report any breaches of safeguards in accordance with the Policy.

Principle 2 – Identifying Purposes

The purposes for which Client Personal Information is collected, used, and disclosed shall be identified and documented at or before the time the information is collected.

IGM Companies may collect Personal Information to the extent necessary to fulfill the purpose for which the information was collected. The type of Personal Information collected will depend on the nature of the relationship with the Client.

IGM Companies generally collect Personal Information for the following purposes:

- Providing Clients with financial services, investment products and account administration;
- Complying with legal and regulatory requirements to provide those services, such as establishing identity, and assessing suitability; and
- Administering accounts, delivering regulatory documents and tax reporting.

Purposes for collection of Personal Information are also disclosed in Client documents and through the IGM Companies' privacy protection notices which are publicly posted on their respective websites.

Principle 3 – Consent

Knowledge and consent of Clients is required for the collection, use and disclosure of Personal Information. There are two forms of consent:

- **Express consent** – the individual has provided consent directly, either in writing or verbally.
- **Implied consent** – the individual has not directly consented but rather consented implicitly through their actions or circumstances.

Consent is not required for the collection, use and disclosure of personal information for legal or security reasons.

Subject to restrictions imposed by law or under a contract and reasonable notice, consent may, at any time, be withdrawn by a Client. IGM shall inform Clients where there are implications of withdrawing or refusing their consent, such as the closure of the Client's account(s).

Principle 4 – Limiting Collection

The amount and type of Personal Information collected shall be limited to that which is necessary for the purposes identified, and collected in a fair and lawful manner.

The types of information collected are described in account application forms, accompanying disclosure booklets, and/or the privacy protection notices posted on the IGM Companies' websites.

Principle 5 – Limiting Use, Disclosure and Retention

Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the Client or as required by the law. Personal Information shall be retained only as long as necessary for fulfillment of those purposes or as required by law.

IGM Companies may disclose Personal Information to their affiliates and third party service providers for the purpose of fulfilling their services to Clients.

IGM Companies remain responsible for Personal Information while in the possession of third parties and protect the information through contracts to ensure comparable levels of protection provided by IGM.

If there is any doubt regarding whether disclosure of Personal Information is permitted, IGM Personnel shall consult with the Privacy Officer prior to disclosing Personal Information.

IGM Companies will retain Personal Information for the period of time prescribed by law and in accordance with record retention policies.

Principle 6 – Accuracy

Personal Information collected shall be accurate, complete and as up-to-date as necessary to fulfill the purposes for which it is to be used.

IGM Companies will confirm or request updates to Personal Information from Clients or other authorized parties as required. Clients may be asked to review and update their know-your-client information on a periodic basis, and dealers may confirm and/or update the Personal Information of fund investors.

Principle 7 – Safeguards

Personal Information shall be protected by security safeguards appropriate to the sensitivity of the information. These safeguards shall protect against loss, theft, unauthorized access, use, disclosure, copying or modification of Personal Information, regardless of the format in which it is held.

IGM Companies safeguard Personal Information using several methods, including but not limited to:

- **Physical measures** – restrict access to offices or areas where Personal Information may be accessible and lock filing cabinets.
- **Organizational Measures** – use of security clearances, limiting access to information on a need-to-know basis based on job roles, and evaluating periodically whether security clearance or access to applications with Personal Information is still required.
- **Technological Measures** – use of passwords, encryption, firewalls and effective systems standards and oversight.
- **Contractual Measures** – ensure contracts with third party service providers contain privacy provisions to protect Personal Information while in their custody and systems standards are met.

Training

All IGM Personnel are responsible for ensuring the appropriate use and protection of all Personal Information, and are required to complete privacy and information security training when commencing employment and annually thereafter.

For information on breaches of security safeguards, refer to **Section 5 Breach of Security Safeguards**.

Principle 8 – Openness

IGM Companies shall publicly post their privacy protection notices on their websites, which include the following information:

- Name or title and the address of the person who is accountable for the IGM Company’s policies and practices, and to whom complaints or inquiries can be forwarded;
- How Clients can gain access to their Personal Information;
- Description of the types of Personal Information collected, used and retained; and
- Description of Personal Information that is shared with affiliates and third party service providers.

The Privacy Officers’ contact information is publicly posted for each IGM Company as follows:

IGM Company	Contact Email
Mackenzie Investments	privacy@mackenzieinvestments.com
IG Wealth Management	privacy@investorsgroup.com
Investment Planning Counsel	privacy@ipcc.ca

Upon request, Clients shall be provided with information about IGM's privacy policies and practices related to the management of Personal Information, which can be found on each IGM Company's publicly posted privacy protection notices. See **Section 6 Privacy Notices**.

Principle 9 – Individual Access

Clients have the right to access Personal Information about them held by an IGM Company. They also have the right to challenge the accuracy and completeness of the information, and have that information amended as appropriate.

Client requests for access to their Personal Information, such as a copy of their Client file, must be made in writing to IGM. Upon request, Clients shall be informed of the existence and use of their Personal Information and provided access to their information within 30 calendar days of receiving the request.

The time limit for responding to access requests may be extended for a maximum of 30 additional days for reasons permitted under PIPEDA. If an extension is required, the IGM Company shall notify the Client of the extension within 30 days of receiving the request, and inform them of their right to complain to the Office of the Privacy Commissioner of Canada and/or provincial Privacy Commissioner(s).

The requested information shall be provided to the Client in a form that is understandable to them. For example, explanations may be provided for abbreviations, codes and acronyms used to record the Personal Information.

Correcting Personal Information

When an individual successfully demonstrates the inaccuracy or incompleteness of Personal Information, IGM Companies will correct the Personal Information as soon as possible, and where required, transmit the updated Personal Information to authorized third party service providers.

Principle 10 – Challenging Compliance

A Client may challenge IGM's compliance with the Fair Information Principles, by addressing concerns to the Privacy Officer of the IGM Company.

IGM shall investigate and respond to all privacy complaints. If a complaint is found to be justified, IGM shall take appropriate measures, including, if necessary, amending its policies, procedures and practices.

5. Breach of Security Safeguards

A breach of security safeguards of Personal Information, or a privacy breach, is defined as any unauthorized access to or disclosure of Personal Information whether intentional or unintentional.

IGM Companies have established comprehensive procedures to respond to a breach, mitigate risks, and prevent re-occurrence.

IGM Companies shall assess whether a breach poses a real risk of significant harm. Significant harm is defined as bodily harm; humiliation; damage to reputation and relationships; loss of employment, business or professional relationships; financial loss or loss of property; identify theft; or negative effects on credit records.

Considerations for determining whether there exists a real risk of significant harm include the sensitivity of the Personal Information, and the probability of misuse of that information.

If it is reasonable in the circumstances to believe that there exists a real risk of significant harm to an individual as a result of the loss, unauthorized access or disclosure of the individual's Personal Information, the breach is subject to the notification requirements

IGM shall notify affected Clients in a timely manner when a privacy breach has occurred and is determined to pose a real risk of significant harm to the individual.

IGM shall notify the federal Privacy Commissioner and/or the provincial Privacy Commissioner(s), where applicable, if a breach of Personal Information is determined to pose a real risk of significant harm to impacted Clients.

6. Privacy Notices

Each IGM Company maintains privacy notices on their websites. For further information, please refer to the privacy notices set out below.

IGM Company	Privacy Notice
Mackenzie Investments	https://www.mackenzieinvestments.com/en/legal-and-privacy/legal-disclaimers#privacy-protection-notice
IG Wealth Management	https://www.investorsgroup.com/en/legal/privacy
Investment Planning Counsel	https://www.ipcc.ca/privacy