

PRIVACY POLICY

The federal *Personal Information Protection and Electronic Documents Act* (PIPEDA), the European Union's *General Data Protection Regulation* (GDPR), the Quebec *Private Sector Act* and similar provincial and territorial privacy legislation (collectively, "**Privacy Laws**") require informed consent by an individual to the collection, use or disclosure of his or her personal information. This policy explains the collection, use and disclosure of an investor's personal information by the Manager.

"**Personal Information**" is defined as information about an "identifiable individual". This includes such things as age, weight, height, medical records, income, education, home address and phone number. It does not cover general contact information such as name, title, business address, business phone number...etc. Under certain Privacy Laws, personal information also includes your email and IP addresses.

Information that GreensKeeper has collected for completion of a subscription agreement and related documents is subject to the requirements of the Privacy Laws. GreensKeeper recognizes the importance of privacy and recognizes the sensitivity of personal information received by it in the conduct of its business. This policy has been prepared with this objective in mind.

Why is personal information collected?

A Subscriber's personal information will be collected to the extent necessary to administer the Fund, to establish and maintain the Subscriber's account, to give Subscribers the best possible service, to allow us to establish a Subscriber's identity, to protect us from error and fraud and to comply with Canadian laws and execute transactions in the Subscriber's account.

What personal information is collected?

Relevant personal and financial information is collected through account opening forms, a Subscriber's transactions with us and our affiliates and meetings and telephone conversations with Subscribers. The information collected includes the Subscriber's name, date of birth, social insurance number, residential address, employment information, banking information, annual income, net worth etc.

We strive to limit the amount of personal information we collect to that necessary and appropriate for the identified purposes. We will not use or disclose your personal information for purposes other than those for which it was collected, except with your consent or as permitted or required by applicable law.

Certain Privacy Laws provides that an individual is deemed to consent to the collection, use or disclosure of personal information about that individual for a particular purpose if the individual voluntarily provides the information for that purpose, and it is reasonable that a person would voluntarily provide that information.

By transacting with GreensKeeper, we consider that you have consented to our collection, use or disclosure of personal information as necessary, to properly represent you in these financial and investment matters.

Where necessary to fulfil our regulatory obligations, we may collect personal information about individuals other than our clients in accordance with the provisions of the Privacy Laws.

When we collect personal information about individuals directly from them, except in situations when their consent to the collection is deemed, we will advise them of the purpose for which the information is collected.

Obtaining consent from the individual after disclosure of the purpose for which the personal information is collected, used and disclosed, is a key element of the Privacy Laws. However, this obligation is not absolute. Certain Privacy Laws permit us to collect, use or disclose personal information about an individual in some circumstances without the individual's consent. Such circumstances include (but are not limited) to where:

- the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- the collection, use, or disclosure is reasonable for the purposes of an investigation or proceeding;

- the personal information is available to the public from a prescribed source; or
- the collection, use, or disclosure is required or authorized by a Federal or Provincial statute or regulation.

When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate and complete. Privacy Laws also generally allow us, for legal or business purposes, to retain personal information for as long as is reasonable, but also impose obligations upon us to ensure that procedures are in place to destroy the personal information when it is no longer required. Regulations require us to retain certain information for up to eight (8) years.

You may vary or withdraw your consent to the use and disclosure of your personal information, or opt-out of certain uses and disclosures, subject to legal and contractual restrictions. To vary or withdraw your consent, please contact our Privacy Officer (identified below).

We use a third-party vendor (MailChimp) to deliver our quarterly Scorecard newsletters and related materials and to manage our website (e.g., Google Analytics). The internet comes with a footprint. Web servers may automatically capture information from visitors to our website including the name of the domain and host from which you access the internet, the internet address of the site from which you enter our website, the pages you visit on our website and the amount of time you spend on our website. This visitor information may be used to improve our website. We use this information to deliver services, personalize our website for you and enable your access. When you sign up for the newsletter on our distribution list, you provide your name and email address and provide explicit consent for us to collect this personal information to do so. We will never sell your email address or name and you can unsubscribe from our distribution list at any time. GreensKeeper may have additional legitimate interests, including account maintenance and administrative purposes, for the collection of the above listed personal information.

What is the personal information used for?

Personal information collected from a Subscriber is used to establish and maintain the Subscriber's account, to give Subscribers the best possible service, to allow us to establish a Subscriber's identity, to protect us from error and fraud and to comply with Canadian laws and execute transactions in the Subscriber's account. If you have provided us with the name of a trusted contact person (TCP) we may contact them to discuss your account: (i) if there are questions or concerns about your contact information, whereabouts or health status; (ii) if we suspect that you may be a victim of fraud or financial exploitation; (iii) if we suspect that you might no longer have the mental capacity to handle your financial affairs; (iv) to confirm the identity of a legal representative, if any; or (v) if we have any other concerns or are unable to contact you about your account(s) held with us. If we believe that you are vulnerable and that financial exploitation has occurred, is occurring, has been attempted or will be attempted, we may place a temporary hold on your account(s). If a temporary hold is instituted or continuing, we will provide you with notice of the temporary hold and the reasons for doing so as soon as possible after instituting the temporary hold and every 30 days thereafter that it remains in force.

Who has access to the personal information?

A Subscriber's personal information may be shared with third parties to administer the Fund, the Subscriber's brokerage account and to comply with applicable legislation. Securities legislation requires that we provide regulators with access to personal information of clients, employees, agents, directors, or officers of the firm. They collect, use or disclose such personal information for regulatory purposes including, surveillance of trading-related activity, audits, investigation of potential regulatory and statutory violations, regulatory databases, enforcement or disciplinary proceedings, reporting and information sharing with other securities and privacy regulators. Certain information is also required to be provided to taxation and other regulatory authorities and agencies. We also rely on third-party service providers to provide fund administration, portfolio and account management, brokerage and custody services and in this role such third-parties will have access to Subscribers' personal information.

How is the personal information kept?

We seek to carefully safeguard Subscribers' private information, and to that end, restrict access to personal information about Subscribers to those employees and other persons who need to know the information to enable us to provide services to Subscribers. Each employee of the Manager is responsible for ensuring the confidentiality of all personal information they may access and to comply with all applicable privacy legislation.

Subscribers' personal information is maintained on our networks or on the networks of our service providers and is accessible at 2010 Winston Park Drive, Suite 200, Oakville, Ontario L6H 5R7. Personal information may also be stored on a secure off-site storage facility. In maintaining your personal information with our third-party service providers, your information will likely be disclosed outside of your own province and Canada. Our service providers are committed by contractual agreements with us to protect your personal information from unauthorized access, collection, use or disclosure. Our service providers are not permitted to disclose your information to others other than as required by law.

Changes to Privacy Policy

Privacy laws are rapidly evolving and, as a result, this Policy may be changed by us from time to time in our full discretion without any prior notice or liability to you or any other person. The collection, use and disclosure of your personal information by us will be governed by the version of this Privacy Policy in effect at that time.

Contacting or Communicating with Us

If you have any questions with respect to our policies concerning the handling of your personal information, our retention policies, or if you wish to request access to, or correction of, your personal information under our care and control, please contact our Privacy Officer at:

Michael McCloskey
Chief Compliance Officer
2010 Winston Park Drive, Suite 200
Oakville, ON L6H 5R7
Email: michael@greenskeeper.ca

Investors should also be aware that we are required to file with each relevant Canadian securities regulatory authority a report setting out personal information such as the Subscriber's name and address, the class and series of Units issued, the date of issuance and the purchase price of Units issued to the Subscriber. Such information is collected indirectly by such regulatory authorities under the authority granted to them in securities legislation, for the purposes of the administration and enforcement of their governing securities legislation. By submitting this subscription, the Subscriber authorizes such indirect collection of the information by each such regulatory authority. The following officials can answer questions about the indirect collection of the information:

Ontario Securities Commission
Inquiries Officer
20 Queen Street West, 22nd Floor
Toronto, Ontario M5H 3S8
Telephone: (416) 593-8314
Toll free in Canada: 1-877-785-1555
Facsimile: (416) 593-8122
Email:
exemptmarketfilings@osc.gov.on.ca

Alberta Securities Commission
FOIP Coordinator
Suite 600, 250 – 5th Street SW
Calgary, Alberta T2P 0R4
Telephone: (403) 297-6454
Toll free in Canada: 1-877-355-0585
Facsimile: (403) 297-2082

British Columbia Securities Commission
FOI Inquiries
P.O. Box 10142, Pacific Centre
701 West Georgia Street
Vancouver, British Columbia V7Y 1L2
Inquiries: (604) 899-6854
Toll free in Canada: 1-800-373-6393
Facsimile: (604) 899-6581
Email: FOI-privacy@bcsc.bc.ca

The Manitoba Securities Commission
Director
500 – 400 St. Mary Avenue
Winnipeg, Manitoba R3C 4K5
Telephone: (204) 945- 2561
Toll free in Manitoba 1-800-655-5244
Facsimile: (204) 945-0330

Financial and Consumer Services Commission (New Brunswick)
Chief Executive Officer and Privacy Officer
85 Charlotte Street, Suite 300
Saint John, New Brunswick E2L 2J2
Telephone: (506) 658-3059
Toll free in Canada: 1-866-933-2222
Facsimile: (506) 658-3059
Email: info@fcnb.ca

Government of Newfoundland & Labrador
Financial Services Regulation Division
Superintendent of Securities
P.O. Box 8700, Confederation Building
2nd Floor, West Block, Prince Philip Drive
St. John's, Newfoundland & Labrador A1B 4J6
Attention: Director of Securities
Telephone: (709) 729-4189
Facsimile: (709) 729-6187

Government of the Northwest Territories
Office of the Superintendent of Securities
Superintendent of Securities
P.O. Box 1320
Yellowknife, Northwest Territories X1A 2L9
Attention: Deputy Superintendent, Legal & Enforcement
Telephone: (867) 767-9305
Facsimile: (867) 873-0243

Nova Scotia Securities Commission
Executive Director
Suite 400, 5251 Duke Street
Duke Tower
P.O. Box 458
Halifax, Nova Scotia B3J 2P8
Telephone: (902) 424-7768
Facsimile: (902) 424-4625

Government of Nunavut
Department of Justice
Superintendent of Securities
Legal Registries Division
P.O. Box 1000, Station 570
1st Floor, Brown Building
Iqaluit, Nunavut X0A 0H0
Telephone: (867) 975-6590
Facsimile: (867) 975-6594

Prince Edward Island Securities Office
Superintendent of Securities
95 Rochford Street, 4th Floor Shaw Building
P.O. Box 2000
Charlottetown, Prince Edward Island C1A 7N8
Telephone: (902) 368-4569
Facsimile: (902) 368-5283

Autorité des marchés financiers
Corporate Secretary
800, Square Victoria, 22e étage
C.P. 246, Tour de la Bourse
Montréal, Québec H4Z 1G3
Telephone: (514) 395-0337 or 1-877-525-0337
Facsimile: (514) 864-6381
Email: fonds_dinvestissement@lautorite.qc.ca

Financial and Consumer Affairs Authority of Saskatchewan
Director
Suite 601 - 1919 Saskatchewan Drive
Regina, Saskatchewan S4P 4H2
Telephone: (306) 787-5879
Facsimile: (306) 787-5899

Government of Yukon
Superintendent of Securities
Department of Community Services
Law Centre, 3rd Floor
2130 Second Avenue
Whitehorse, Yukon Y1A 5H6
Telephone: (867) 667-5314
Facsimile: (867) 393-6251
Email: securities@gov.yk.ca

If you are dissatisfied with our handling of your personal information, we invite you to contact our Privacy Officer in writing, setting out the reasons for your concern. If you remain dissatisfied after our Privacy Officer has reviewed and responded to your concern, you may wish to contact the Office of the Information and Privacy Commissioner.

We also encourage you to obtain a complete copy of PIPEDA to further determine the rights and obligations contained within that legislation, and to obtain independent legal advice if considered necessary.

The contact information for the Office of the Privacy Commissioner and a copy of PIPEDA can be obtained from the following link: <https://www.priv.gc.ca/en/contact-the-opc/>

Facts	WHAT DOES GreensKeeper Asset Management Inc. (“GreensKeeper”) DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Name, age, address, and Social Security Number • Income, account balances and debt • Financial goals, spending habits and other information related to your financial condition 	
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons we choose to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	Not Applicable
For our affiliates’ everyday business purposes – information about your transactions and experiences	No	Not Applicable
For our affiliates’ everyday business purposes – information about your creditworthiness	No	Not Applicable
For our affiliates to market to you	No	Not Applicable
For non-affiliates to market to you	No	Not Applicable

Privacy Notice – U.S. Clients

To limit our sharing	<p>*Mail the form below.</p> <p>Please note: If you are a new customer, we can begin sharing your information from the date you received this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 905-827-1179
Who we are	
Who is providing this notice?	GreensKeeper Asset Management Inc. ("GreensKeeper")
What we do	
How does GreensKeeper protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files, and buildings.
How does GreensKeeper collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes—information about your creditworthiness • Affiliates from using your information to market to you. • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Mail-in this section		
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <ul style="list-style-type: none"> • Apply only to me 	<p>Mark any you want to limit:</p> <ul style="list-style-type: none"> • Do not share information about my creditworthiness with your affiliates for their everyday business purposes. • Do not allow your affiliates to use my personal information to market to me. 	
	Name	<p>Mail to: GreensKeeper Asset Management Inc. 2010 Winston Park Dr., Suite 200 Oakville, Ontario, Canada L6H 5R7</p>
	Address	
	Phone Number	