



WEBSITE
PRIVACY POLICY

Origin Wealth Advisory Services Ltd. (“Origin Wealth”) is committed to protecting its clients’ personal information. Our policies and practices comply with Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA) and all other applicable provincial standards and legislation. This policy sets out our practices for collecting, using, and disclosing of personal information pertaining to our clients, as well as the measures taken to ensure that such information is properly handled.

1. “Personal information” means any information identifying you, including your name, address, telephone number, email, or other contact information, financial information concerning you and your spouse, information concerning your occupation or that of your spouse, as well as your credit information and investment instructions.
2. We will let our client know why information is being collected. Before opening an account at Origin Wealth, your advisor must collect certain personal information to comply with legal and regulatory requirements. Client file may include information about your investment expertise, annual income, profession, as well as your social insurance number. For corporate accounts, we collect personal information as noted above for the individuals authorized to trade on the account and the beneficial owners. Additionally, we will collect corporate documentation, ownership structure, shareholders, financial information, and jurisdiction of incorporation or registration status.
3. We will obtain client consent to collect, use and disclose your personal information. When you open an account with Origin Wealth, you will be asked to sign the investment management agreement and account application form. By doing so, you agree to the collection, use and disclosure of your personal information as set out in our Privacy Policy.
4. Origin Wealth does not sell, trade or lend our clients’ personal information to any third parties unless we have your express permission to do so. There are, however, times when disclosing personal information is necessary. Origin Wealth is supported by a custodian, Fidelity Clearing Canada ULC (“FCC”). FCC provides back-office and recordkeeping services to Origin Wealth. Origin Wealth has an agreement in place with FCC, which includes provisions to protect the privacy of clients.
5. Origin Wealth will retain personal client information after the client ceases being a client for as long as is required by record retention laws and as long as legally necessary (with a minimum of seven years) in order to respond to any issues that may arise at a later date.
6. Origin Wealth may also share information with other service providers who we may hire. We require any third-party service providers to sign a privacy agreement to protect the confidentiality of client information. We may also be required to provide a client’s personal information to various organizations including regulatory bodies, government institutions, and law enforcement agencies. Best efforts are used to ensure our service providers, suppliers, and agents, as part of their contract with us, are bound to maintain the confidentiality of our clients and may not use the personal information for any unauthorized purpose. Some service providers may use servers located outside of Canada. In such case, client information may be stored outside of Canada and there may be potential privacy risks.



7. Origin Wealth is committed to protecting the privacy of its clients. We have implemented procedures that are designed to prevent unauthorized access to confidential information. As a condition of employment, our employees must sign a Code of Business Conduct and Ethics. One of the basic principles of that code is to maintain the confidentiality and privacy of the information in each client records. We also provide our employees with ongoing training on policies and procedures with regards to handling and protecting personal information and make sure they are regularly updated on new developments.
8. Having accurate information about a client enables Origin Wealth to give the client the best possible service. Clients are asked to keep Origin Wealth informed of any changes such as if there is a change in contact information, or any material changes to personal information.
9. Clients have a right to access their personal information by contacting the Privacy Officer in writing. Once the client's identity has been confirmed, Origin Wealth will provide the client with the requested information within a reasonable period of time. Origin may refuse access in certain circumstances prescribed by law such as where the information contains the personal information of other persons, where disclosure of your information to a client would reveal our confidential commercial information or violate our legal privilege, or where otherwise is required or permitted by law to refuse access. Should you want to access your personal information, make a request for information, or have any privacy questions and concerns, please contact the Privacy Officer.
10. In the event of a privacy breach of personal information, Origin Wealth will conduct a thorough investigation and take steps to remediate and address the situation.
11. If your account or the securities in your account become unclaimed property within the meaning of any applicable legislation governing unclaimed property or otherwise, Origin Wealth will adhere to all unclaimed property legislation. To ensure that your account or the securities in your account do not become unclaimed property, always inform us of any changes to your personal information, including your address.
12. Clients may withdraw their consent at any time by providing a written request, subject to legal and contractual restrictions and reasonable notice. Once consent has been withdrawn, Origin Wealth may not be able to open or maintain the account(s) or provide certain services to the client. Should you withdraw your consent, we may be obliged to close your account or cease to provide services to you.
13. If you have an inquiry about Origin Wealth's privacy practices or how we and our service providers treat your personal information, please contact us at:

Privacy Officer
#106-1008 Beach Avenue
Vancouver BC
V6E 1T7
Email: Compliance@originwealth.com

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