



## PRIVACY POLICY

Highcourt Partners Limited is committed to protecting your privacy and personal information. As part of compliance with federal legislation, and in accordance with the Personal Information Protection and Electronic Document Act (PIPEDA) effective January 1, 2004, Highcourt Partners Limited will adhere to the following PIPEDA principles:

**SECURE & COMPLIANT**  
Trade secrets and your data need to be protected. At Highcourt Partners we take this duty very seriously and use every practical method to protect your information. For more information concerning the privacy policy of Highcourt Partners Limited, please contact our Privacy Officer by email at [jcarlton@highcourtpartners.com](mailto:jcarlton@highcourtpartners.com).

### 1. Accountability

We will be responsible for the protection of personal information, and will be accountable for compliance with PIPEDA guidelines.

### 2. Identifying Purposes

The purposes for the collection of personal information will be identified before or at the time of collection.

### 3. Consent

The knowledge and consent of our client is required for the collection, use, and/or disclosure of personal information.

### 4. Limiting Collection

We will limit the collection of personal information to that which is necessary for the purposes identified. Information shall be collected by fair and lawful means.

### 5. Limiting Use, Disclosure, and Retention

We will not use, disclose, or retain personal information for purposes other than those for which it was collected, except with the consent of the individual as required by law.

### 6. Accuracy

We will ensure that personal information is accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### 7. Safeguards

Your personal information shall be protected using security safeguards appropriate to the sensitivity of the information.

### 8. Openness

We shall make readily available our policies and practices relating to the management of personal information.

### 9. Individual Access

Upon request, we will inform an individual of the existence, use and disclosure of his or her personal information, and that individual shall be granted appropriate access to this information.

### 10. Challenging Compliance

Individuals can challenge our personal information practices, and we will investigate accordingly.

HIGHCOURT PARTNERS LTD

560-130 King Street West  
Toronto, ON CANADA  
M5X 1E4

[www.highcourtpartners.com](http://www.highcourtpartners.com)

