



Privacy Policy

At AltaCorp Capital Inc. (“AltaCorp”) we do our best to keep your personal information in strict confidence, providing you with control and access to your information.

This policy outlines the principles adopted by AltaCorp in regards to the collection, use and disclosure and safeguarding of personal information provided to us either directly by you or by a third party.

For the purposes of this privacy policy, “personal information” means information that can identify an individual directly or through other readily available indirect means. Personal information does not include a person’s name, title, business name, business address, business email address, business telephone number or similar information.

Why We Gather Personal Information:

At AltaCorp, we collect personal information when you or your organization elects to conduct business with us or have us conduct business services or transactions on your behalf. We use this information to carry out business, administrative and technological functions and processes (collectively “Business Processes”) associated with these services and transactions.

In providing these Business Processes, personal information may be shared with affiliated companies or third parties who have been retained by AltaCorp to assist us in carrying out various Business Processes. In these cases, we select the third parties carefully and confirm that they use similar standards to us in regards to privacy.

In addition, we gather and use personal information in accordance with all securities legislation, regulations, rules and policies, as well as the rules of any self-regulatory agency (collectively, the “Securities Laws”) applicable to AltaCorp. There are some situations where we are legally permitted to disclose personal information to protect AltaCorp (example being the collection of outstanding accounts) or in the detection and prevention of fraud.

Type of Information We Collect

The collection, use and disclosure of information by AltaCorp may include, but is not limited to, the following:

- Surveillance of trading – related activity;
- Sales, financial compliance, trading desk review and other regulatory audits;
- Investigation of potential regulatory and statutory violations;
- Regulatory databases;
- Enforcement or disciplinary proceedings;
- Reporting to securities regulators; and
- Information – sharing with securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction with any of the foregoing.



How We Collect Such Personal Information:

We may gather such personal information from you in person over the telephone or by corresponding with you via email, facsimile, the Internet or from third parties who have your authority to disclose such information to us. While we try to ensure that every third party who discloses personal information to us has your consent to do so, if you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party. If they do not adequately respond to your inquiries then please let us know immediately.

Consent

When you engage our business services, we will only use personal information with your consent. Consent may be expressed or implied. Express consent may be written or verbal. Consent is implied when we can reasonably conclude that you have given consent by an action you have taken or not taken, where the context reasonably requires that we have and use this information to accomplish what you have asked us to do. By providing personal information to us or authorizing a third party to provide your personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this policy.

The choice to provide us with your personal information, either directly or through a third party, is always yours. However, your decision to withhold particular information may result in limiting our ability to provide you with the services or products you requested.

AltaCorp's Website

This website, www.altacorpcapital.com, is governed by the provisions and practices stated in this privacy policy.

This website may contain links to other third-party sites that are not governed by this privacy policy. Although we endeavour to only link to sites with similar high privacy standards, our privacy policy will no longer apply once you leave this website.

We may collect or authorize third parties to collect anonymous information from visits to our website to help us provide better customer service. We may collect this type of information for statistical purposes and for evaluating our website to make it more useful to visitors.

How We Safeguard Your Information

We use industry-standard technologies and maintain current security standards to ensure that personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. Electronic customer files are kept in a secured environment with restricted access. Paper-based files are stored in a secure work space environment.

Although AltaCorp does use industry-standard security for its electronic data, our communication with you over the internet does not utilize encryption technology. Unfortunately, should you choose to communicate with us through the internet or email, our communication may be intercepted and read by a third party.



Our Employees and your Personal Information

In the course of daily operations, access to private, sensitive and confidential or personal information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it.

As a condition of employment, all employees of AltaCorp are required to abide by the privacy standards we have established. Employees are informed about the importance of privacy and are required to annually confirm that they are in compliance with AltaCorp's policies and procedures manual that prohibits the disclosure of customer information to unauthorized individuals or parties.

Unauthorized access to and/or disclosure of personal information is strictly prohibited. All employees are expected to maintain the confidentiality of personal information at all times and failing to do so may result in appropriate disciplinary measures, which may include dismissal.

AltaCorp Commitments to You:

1. We will maintain and protect your personal information under our control. We will carefully select any third parties with which we share this information with for the appropriate purposes of our Business Processes and ensure that they have similar privacy standards.
2. We will inform the source (you or a third party provider) from which your personal information is collected as to the purpose for which the information will be used.
3. Except where required or permitted by law, we will only obtain and use your personal information with your consent. (See discussion above for description of consent.)
4. You may withdraw your consent at any time after you have given it to us, provided there are no legal requirements to prevent this.
5. Your personal information that we collect is limited to those details necessary for our Business Processes identified at the time of collection.
6. We will only use or disclose your personal information in accordance with the purposes for which it was collected, or when it is required or permitted by law.
7. We will retain your personal information only for so long as it is required to fulfill the purpose for which it was collected or as required by law.
8. We will make every reasonable effort to ensure that personal information is maintained in an accurate, complete and up-to-date form in view of the purposes for which it will be used.
9. We will utilize industry-standard (or better) security safeguards to protect your personal information that is in our possession.
10. Upon your request, we will provide you with the following information relating to your personal information:
 - Type of personal information collected;
 - How AltaCorp has used such personal information in the past and may use in the future;
 - A list of third parties that AltaCorp has disclosed your personal information to and the content of the disclosure;

You may verify the accuracy and completeness of the personal information that we have for you and may request that it be amended and corrected, if appropriate.



11. We have designated our Chief Compliance Officer as being accountable for the compliance of these policies. You may direct any questions or concerns with respect to this privacy policy or our information-handling practices by contacting:

AltaCorp Capital Inc.
410, 585 8th Avenue SW
Calgary AB T2P 1G1
Attention: Chief Compliance Officer
compliance@altacorpcapital.com
(403) 539-8600

12. Any changes to this policy and our information-handling practices will be acknowledged in this policy in a timely manner. We may add, modify or delete portions of this policy when we feel appropriate to do so. This policy was last updated on April 20, 2015.