Tacita Capital

TACITA CAPITAL INC. PRIVACY POLICY

Effective Date: November 26, 2026

Tacita Capital Inc. (“TCI”, “we”, “us" and similar terms throughout this Policy), is committed to protecting your privacy and maintaining the confidentiality of your personal information.

This Policy applies to Personal Information collected, used or disclosed by TCI in the course of its commercial activities, including when you use our services, visit our website, or interact with us through communications and marketing activities.

For the purposes of this Policy, “Personal Information” means information about an identifiable individual, including if there is a significant possibility that an individual could be identified through the use of that information, whether alone or in combination with other information. Personal Information does not include business contact information that is used solely for the purpose of communicating or facilitating communication with an individual in relation to his/her employment, business or profession, or publicly available information as defined by applicable privacy legislation.

We have put policies and procedures in place to effectively safeguard any Personal Information that we have on file or collect, as more fully described below.

What Personal Information Do We Collect?

We collect Personal Information about our clients, prospective clients, investors in our Private Pools, individuals who contact us or sign up for our communications, and visitors to our website. The categories of Personal Information we collect are described below.

Identification and Contact Information

Name, date of birth, citizenship, country of birth, government-issued photo identification, signature, residential and mailing address, email address, and telephone number.

Tax and Regulatory Information

Tax identification numbers (e.g., social insurance numbers), foreign tax identification numbers where applicable, tax returns, and residency for tax purposes.

Financial Information

Banking details, financial history, balance sheet, cash flow, and investment account statements.

Employment Information

Employer name, role, duration of employment, and compensation.

Personal Circumstances

Marital status, dependants, trusted contacts, health information, and estate planning documents such as Wills and Powers of Attorney.

Investment Information

Investment objectives, knowledge and experience, risk capacity and tolerance, current holdings, liquidity needs, cash withdrawal requirements, investment time horizon, insider status, and any investment

restrictions relevant to your Investment Policy Statement.

Non-Individual Account Information

For corporate, trust, estate, individual pension plan, and other non-individual accounts, we collect information regarding beneficial owners, trustees, directors, and other persons authorized to provide direction on the account, including their name, address, contact information, date of birth, occupation, photo identification, and signature.

Meeting Recordings

We may record meetings with you to accurately capture notes and action items. We will notify you if a meeting will be recorded, and you are able to decline recording.

Marketing and Communication Preferences

Preferences with respect to receiving newsletters, publications, event invitations, and other communications from us.

Website Information

Device information, browser type, IP address, general location, demographic information, and information regarding site usage. Please see the Website Privacy Notice available on our website for more information.

How Do We Collect Your Personal Information?

We collect Personal Information from you directly wherever possible. With your consent, we may also collect your Personal Information from members of your family, your professionals, intermediaries acting on your behalf, and from service providers who help us verify your information. We limit our collection to what is reasonably necessary for the purposes described in this Policy.

Clients

We collect your Personal Information when you open an investment account through us and throughout our ongoing relationship. We collect this Personal Information directly from you, as well as from members of your family and other professionals or individuals you have authorized to provide us with information in connection with your investment needs.

Your Personal Information may be collected from a variety of sources, including, but not necessarily limited to, the following:

a) Investment Policy Statements, account applications, subscription agreements, questionnaires, other forms that you submit to us, or contracts that you enter with us;
b) account statements, tax returns, insurance policies, employment and stock option agreements, as well as pension and other financial documents supplied to us by you or your other professional advisors;
c) your transactions with us;
d) meetings and telephone conversations with you; and
e) emails and correspondence with you.

We may collect Personal Information either directly or through dealers, authorized advisers, agents and other intermediaries and professionals. Certain third parties, such as identity verification services and credit reporting agencies, may also share your Personal Information with us in accordance with their respective terms and conditions and/or privacy policies.

Under Canadian securities legislation and our know your client obligations, we are required to update your Personal Information no less than once a year or whenever a material change occurs in your circumstances. These updates may take place in person, over the phone, or by other forms of correspondence.

Prospective Clients

We collect Personal Information about you when you contact us to inquire about our services, or when you are referred to us by an existing client or professional contact who has your consent to do so.

TCI Premia Private Pools

We collect Personal Information about you as an investor in TCI Premia Private Pools through subscription agreements and related documents, whether provided directly by you or through the dealer, authorized adviser, agent, or other intermediary through whom your investment is made.

Individuals Who Contact Us or Sign Up to Receive Communications

We collect Personal Information about you when you submit an inquiry, sign up to receive our newsletters, publications, and event invitations, or otherwise correspond with us.

Website Visitors

We collect Personal Information about you when you visit our website, through online forms, cookies, analytics tools, and similar technologies.

How Do We Use Your Personal Information?

Clients

We collect and maintain your Personal Information to manage your investments, provide you with advice and services, establish your identity, seek to protect you from error and fraud, and comply with the law. In addition, we may use your Personal Information to:

a) assess your suitability for certain investments;
b) execute transactions on your behalf;
c) liaise with your other professionals;
d) verify and correct your Personal Information; and
e) provide you and/or your other professionals with investment statements, confirmations, tax receipts, and other financial information to service and administer your account.

Prospective Clients

We collect Personal Information to respond to your inquiries and requests, determine your eligibility and suitability for our services, and provide you with relevant details about what we offer. In addition, we may use your Personal Information to:

a) assess your suitability for specific investments;

b) provide preliminary advice and recommendations;
c) verify and correct your Personal Information; and
d) liaise with your other professionals.

TCI Premia Private Pools

We use your Personal Information to facilitate, maintain, and administer your investment in TCI Premia Private Pools, to communicate with you and with the dealer, authorized adviser, agent, or other intermediary through whom your investment is made, to provide and manage any other services you have requested, to protect you from fraud, and to comply with the law.

Individuals Who Contact Us or Sign Up for Our Communications

We use your Personal Information to respond to your communications and requests for information, and to provide you with the newsletters, publications, event invitations, and other content that you have signed up to receive.

Website Visitors

We use your Personal Information to evaluate the design, content, navigation, use, and functionality of our website, to better tailor your experience, and to conduct data analytics.

Whom Do We Share Your Personal Information With?

We may share your Personal Information, when necessary, to our third-party service providers and agents, and the suppliers to those third-party service providers and agents, in connection with the services we provide to you. Where we do so, we use contractual or other means to provide a comparable level of protection while the Personal Information is being handled by a third-party service provider or agent. The following is a list of such third-party service providers and agents:

a) financial service providers, such as investment dealers, custodians, banks and others used to finance or facilitate transactions or operations of your account;
b) transfer agents, portfolio managers, brokerage firms, and similar service providers that may be involved in the planning or execution of your investment strategy;
c) professional service providers such as accountants, lawyers, tax preparers or insurers; and
d) technology and data service providers, including providers of systems and services used to manage client information, investment accounts, reporting and related business operations.

Where you have consented, we may also share your Personal Information with your other professional advisors.

We do not sell, lease, barter, or otherwise deal in your Personal Information to third parties.

We may, in the future, be involved in the acquisition of investment businesses or sell, transfer, or reorganize some or all of our business. In connection with any such transaction, TCI may disclose your Personal Information to the organizations involved. Where this occurs, we will require any organization receiving your Personal Information to protect it in a manner that is consistent with this Privacy Policy.

How We Obtain Your Consent to the Collection, Use and Disclosure of Your Personal Information?

We obtain your consent before we collect, use, or disclose your Personal Information except where we are permitted or required by law to do so without consent. The form of consent we seek depends on the sensitivity of the Personal Information involved and circumstances of collection.

We obtain your express consent in writing, electronically, or verbally. You may provide us with express consent, for example, by signing an Investment Counsel Agreement, completing an account application, or otherwise directly authorizing a specific collection, use, or disclosure of your Personal Information.

We may also rely on your implied consent to collect, use and disclose your Personal Information where implied consent is permitted by applicable legislation. Implied consent may arise, for example, when you contact us to request information, make an inquiry, or visit our website.

We will not, as a condition of providing our services, require you to consent to the collection, use and disclosure of Personal Information that is not required to fulfill the purposes described in this Policy.

If you provide us with Personal Information about another individual, we will assume that you are authorized to do so and that you have obtained that individual's consent to the collection, use and disclosure of their Personal Information for the purposes described in this Policy.

What Are Circumstances Where Sharing Without Consent Can Occur?

There are circumstances where we may collect, use or disclose your Personal Information without your consent when permitted or required by law or lawful authority. For example, we may be compelled by legal action to release Personal Information, including in responding to a subpoena or in the case of a search warrant, court order or other legally binding request. We may also disclose Personal Information to government agencies and auditors in connection with our legal reporting obligations, such as provincial securities regulators, the Canada Revenue Agency and the Financial Transactions and Reports Analysis Centre of Canada.

We may also use or disclose Personal Information without consent to act in an emergency that threatens an individual's life, health, or security.

Can You Withdraw Your Consent?

You may subsequently withdraw all or part of your consent for us to collect, use or disclose your Personal Information at any time, subject to legal or regulatory requirements or contractual obligations, and with reasonable notice, by contacting our Privacy Officer using the contact information provided below. TCI will inform you of the implications of such withdrawal of consent for the continued provision of advice and services.

If you no longer wish to receive our marketing email communications, follow the unsubscribe instructions included in each electronic message.

How Do We Manage Information About Minors?

We process Personal Information about minors when provided to us by a parent, legal guardian, trustee, or other account holder acting on the minor's behalf. This information is strictly limited to what is required to establish, verify, and administer in-trust accounts, trusts, or other structures in which a minor has a beneficial interest. We use this information solely for administrative, legal, tax reporting, and regulatory compliance purposes. We do not use or disclose Personal Information about minors for marketing or promotional activities.

Our website is directed to adults and is not intended for use by individuals under the age of majority. We do not knowingly collect Personal Information directly from a minor through our website.

If you believe we have collected Personal Information directly from a minor without the consent of a parent, legal guardian, or other authorized adult, contact our Privacy Officer using the information provided below, and we will take immediate steps to delete that information from our records.

How Do We Safeguard Personal Information?

We have policies and procedures in place to protect your Personal Information from loss and unauthorized access or disclosure. We maintain administrative, physical and technological safeguards, including but not limited to controlled access to our offices, physical locks, security software, passwords, firewalls, encrypted email, and encryption of our network and devices. Our employees receive training on the secure and confidential handling of Personal Information.

We restrict access to Personal Information about you to employees and other persons who need to know that information to provide services to you. Employees who collect, process, have access to Personal Information and those who implement related systems and controls, are primarily responsible for managing and safeguarding such information in accordance with our internal policies and procedures. Each year, our employees are required to sign an acknowledgement confirming their adherence to TCI's policies and procedures including this Privacy Policy. The Chief Compliance Officer is responsible for assessing and overseeing compliance with this Policy.

No method of transmitting or storing Personal Information online is completely secure. Notwithstanding the safeguards described above, the security and privacy of Personal Information exchanged over the internet is subject to inherent limitations beyond our control, and such information may be viewed or intercepted in transit by a third party. We cannot guarantee the security of Personal Information transmitted to or by, or stored by us electronically.

Storage and Destruction of Your Personal Information

We retain your Personal Information in electronic or paper format at our office in Toronto, Ontario in accordance with our data retention and data back-up policies. We generally retain your Personal Information for as long as required for the purposes described in this Policy, or for such longer period as required by law. This period may extend beyond the end of our relationship with you, for as long as necessary for us to meet our legal and regulatory requirements and to respond to any outstanding matters.

When your Personal Information is no longer required for the purposes described in this Policy, or for any other legally permissible reasons, we will securely dispose of your Personal Information in accordance with our data retention policies.

Transfer of Personal Information Outside of Canada

We or our technology providers may store, process, or transfer your Personal Information outside of Canada, including in the United States. Where this occurs, your Personal Information may be accessible to foreign courts, law enforcement and national security authorities.

Transfer of Personal Information of Quebec Residents Outside of Quebec

With your consent or when permitted by applicable law, your Personal Information may be stored and/or processed outside of Quebec. It may also be processed by our employees operating outside of Quebec or for one of our service providers. In these instances, we have implemented procedures that are designed to restrict access to an individual's Personal Information only to the personnel who need to know that information in order to provide products or services. In order to guard such information, physical, electronic, and procedural safeguards are in place.

Where we transfer your Personal Information to another jurisdiction (e.g., outside of your province of residency), we will ensure that it is protected in a manner that is consistent with how we protect your Personal Information in Canada.

What Are Your Rights?

You have the right to ask whether we hold any Personal Information about you and to view that information, as provided by law.

If you believe any of the Personal Information that we have collected about you is incorrect or incomplete, you have the right to ask us to correct it, and we will make the necessary changes. If you are not satisfied with how we handled your request, you can follow our complaint resolution procedures.

In certain circumstances, you have the right to request the deletion of your Personal Information. Upon receipt of the request, and after verifying its validity, we will delete the Personal Information from our records and direct our third-party service providers to do the same, subject to any applicable legal and regulatory retention requirements.

Before granting you access to your Personal Information on file, we may ask you to provide us with sufficient proof of identity for that specific purpose.

To exercise your rights, please contact our Privacy Officer using the contact information provided below.

We reserve the right to deny access to your Personal Information where disclosure would violate any law or legal requirement, compromise security, or reveal references to other individuals. We also reserve the right to deny a request to correct your Personal Information if we determine that the requested correction is not warranted. If we deny your request, we will provide you with written reasons within thirty (30) days.

To the extent permitted by law, we also reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive request to access, correct or delete your Personal Information, and for any additional copies of the Personal Information you request. A cost estimate will be provided.

How To Obtain More Information or Register a Complaint?

You can contact us to:

1. View, update, correct or delete Personal Information we have about you.
2. Withdraw your consent.
3. Obtain information about your access rights.
4. Discuss privacy issues in general.
5. Register a complaint.

Please direct all such requests to TCI's Privacy Officer and Quebec Privacy Officer at:
Tacita Capital Inc.
Attention: Privacy Officer or Quebec Privacy Officer
Suite 2020 – 150 King St. W., Box 10
Toronto, Ontario, M5H 1J9
Phone: 416-640-6740
Email: info@tacitacapital.com

How will I know that my complaint is being investigated?

We will promptly issue an initial written acknowledgement stating receipt of your complaint. This will be sent via email or by mail.

What can I expect in response to my complaint?

We will provide a written response stating the resolution to your complaint, including information on your rights. Please note that more complex matters may require additional time to investigate. In all cases, we will endeavor to provide a prompt response and will notify you if your response will be delayed.

What if I feel that my complaint has not been resolved satisfactorily?

If you are of the view that your complaint has not been resolved satisfactorily, you may ask us to reconsider the response. Alternatively, you may contact the Office of the Privacy Commission of Canada or the Commission d'accès à l'information du Québec.

What is the Office of the Privacy Commission of Canada (OPC)?

The OPC oversees compliance with PIPEDA, Canada's federal private-sector privacy law.

You can find out more about the OPC on their website: https://www.priv.gc.ca/en/about-the-opc/

The OPC can be contacted by mail, telephone, or through an online form. Contact information is available at: https://www.priv.gc.ca/en/contact-the-opc/contact-the-information-centre/

To file a formal privacy complaint related to the handling of your Personal Information by TCI, the formal filing process can be found at: https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/

What is the Commission d'accès à l'information (CAI) du Québec?

The CAI oversees compliance with Quebec's provincial privacy and access legislation.

You can find out more about CAI on their website: https://www.cai.gouv.qc.ca/english/

The CAI can be contacted by mail, email, or telephone. Contact details are available through the following page: https://www.cai.gouv.qc.ca/a-propos/nous-joindre/

What if I have general questions about the Complaints Handling Procedure?

Please see Our Complaint Policy and Process available on our website.

When you successfully challenge the accuracy or completeness of Personal Information, we shall correct, delete, or add Personal Information as required. When appropriate, the amended Personal Information will be transmitted to any third parties having access to the Personal Information in question.

It's important to note that our ability to provide necessary services may be impacted should you withdraw your consent to the collection, use and disclosure of your Personal Information as outlined above. Where applicable, we will clearly disclose the consequences of consent withdrawal and may seek legal counsel to determine an appropriate course of action.

Updates and Changes to this Policy

We may add to, change, update, or modify this Policy from time to time. We will post all changes to this Policy on our website and identify its effective date.