

Privacy Notice

Canada Growth Fund Investment Management
(CGFIM)

Part I: Purpose

This Privacy Notice (External) (the “**Notice**”) has been prepared by Canada Growth Fund Investment Management Inc. (“**CGFIM**”) and sets out the way CGFIM collects, uses, discloses, and otherwise manages (collectively “processes”) personal information. For information on how Canada Growth Fund Inc. processes personal information, please consult the following [link](#).

Part II: Privacy Principles

1. Collection of Personal Information

- a. CGFIM does not collect personal information unless it relates directly to an activity of CGFIM as the investment manager for Canada Growth Fund Inc. Personal information collected by CGFIM is limited to what is necessary to carry out this mandate.
- b. Subject to limited exceptions under the *Privacy Act* and other applicable legislation, CGFIM will, wherever possible, collect personal information that is intended to be used for an administrative purpose directly from the individual to whom the information relates, except where the individual otherwise authorizes, or where the information is permitted to be disclosed to CGFIM by another government institution under the *Privacy Act*.
- c. CGFIM will inform any individual from whom it collects personal information of the following:
 - the purpose for which the information is being collected;
 - the authority for the collection, including whether response is voluntary or is required by law;
 - any uses or disclosures to be made of the information;
 - of the possible legal or administrative consequences of refusing to provide the information; and
 - the rights that the individual has with regards to personal information CGFIM holds and that relates to them.
- d. CGFIM may collect personal information from an individual in the following circumstances:
 - In connection with meetings, conferences or other activities offered by us. In the course of these activities, CGFIM may collect personal information such as business contact information for the purposes of administering the activities. In addition, CGFIM may collect audio and video recordings for the purposes of recording meeting, training, or conference sessions for use within the organization;
 - CGFIM may collect personal information such as screenshots, screen recordings or other personal information since all electronic communications to or from CGFIM's domain is subject to monitoring for security and compliance purposes;
 - In connection with the creation of an external identity to access CGFIM's systems, CGFIM may collect the full name, email address and logs for the purposes of creating and administering external access to our systems;
 - In connection with unincorporated contractors, CGFIM may collect personal information such as their tax number for tax payment, remittance, and compliance purposes;
 - In limited circumstances, CGFIM may conduct reputational due diligence on individuals in the context of its investments activities using publicly available information or databases without informing the individual beforehand or securing the individual's consent. In those limited circumstances, informing or obtaining the consent from the specific individual would defeat the purpose or be prejudicial to the use for which information is being collected and/or would not be possible or appropriate given the particular circumstances of the potential transaction or business relationship (for instance, public merger and acquisition transactions, minority or passive investments, credit investments, highly competitive private transactions conducted by auction or similar circumstances);
 - If you choose to send us an email or communicate with us via a social media platform (either privately or publicly) or by other means, your personal information may be used by CGFIM to respond to your inquiry or pursue a business interest. The information you provide will only be shared with another government institution if your inquiry relates to that institution. CGFIM does not use this information to create individual profiles, nor does it disclose the information to anyone other than to those individuals within CGFIM who need to provide you with a response. Any disclosure of your personal information in this context will be done in accordance with the *Privacy Act*. Emails and other electronic methods used to communicate with CGFIM may not be secure and CGFIM cannot guarantee the confidentiality of communications initiated by email or via a social media platform. Therefore, it is recommended that you **do not** send sensitive personal information, such as your Social Insurance Number or your date of birth, through electronic means.

2. Retention and Disposal of Personal Information

- a. CGFIM has a document retention schedule (“**the Schedule**”). The Schedule sets out retention periods for the various categories of personal information CGFIM holds. The Schedule is reviewed and updated periodically and is subject to any legal obligations to retain certain information.
- b. Generally, personal information that has been used by CGFIM for an administrative purpose shall be retained for at least two years following the last time the information was used for such purpose, unless the individual consents to its disposal.
- c. Personal information collected in connection with administrating external identities is retained for three years after it is no longer necessary, subject to any legal obligations to retain this information.
- d. Where a request for access to personal information has been received, the personal information subject to such request shall be retained until the requesting individual has had the opportunity to exercise all his or her rights under the *Privacy Act* or the *Access to Information Act* with respect to such personal information.
- e. CGFIM shall dispose of personal information under its control in accordance with the *Privacy Act*.

3. Accuracy of Personal Information

CGFIM shall take all reasonable steps to ensure that personal information it uses for an administrative or operational purpose is as accurate, up-to-date, and complete as possible.

4. Use and Disclosure of Personal Information

- a. CGFIM relies on consent of the individual to whom the personal information relates, to use and process personal information under its control, except when:
 - using it for the original purpose for which the information was collected or compiled by CGFIM;
 - for a use consistent with that purpose;
 - for a purpose for which the information may be disclosed in accordance with Section 8(2) of the *Privacy Act* - This restriction does not apply to disclosures to federal investigative bodies for the purpose of law enforcement or investigations under Section 8(2)(e) of the *Privacy Act*; or
- b. CGFIM will not, without the consent of the individual to whom the personal information relates, disclose personal information of Canadian citizens or residents under its control except for the purpose for which the information was obtained or compiled by CGFIM or for a use consistent with that purpose or otherwise for a purpose enumerated and permitted under the *Privacy Act*.

5. Security and Protection of Personal Information

CGFIM shall protect personal information in its custody or control using physical, organizational, and technical security safeguards appropriate to the sensitivity of the information. The security safeguards shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. More sensitive personal information shall be safeguarded by a higher level of protection.

6. Personal Information Rights

Subject to and in accordance with the *Privacy Act*, CGFIM will, on request by an individual, provide the following rights: (1) access any personal information about that individual contained in a personal information bank; and (2) access to any other personal information under its control with respect to which an individual is able to provide sufficiently specific information on the location of the information so as to render it reasonably retrievable by CGFIM and (3) correct the personal information where the individual believes there is an error or omission in the information. CGFIM will respect the privacy of requesters and will limit, on a need-to-know basis, the disclosure of information that could directly or indirectly lead to the identification of a requester, unless the requester consents to such disclosure.

To make a personal information request to the Canada Growth Fund Inc., please following the directions at the following [link](#).

Access Requests:

Formal requests for access to personal information must be made through the ATIP Online Request Service website using this [link](#) or by submitting a completed [Access to Personal Information Request Form](#) to the CGFIM ATIP Coordinator with sufficiently specific information about the location of the personal information so as to render it reasonably retrievable by CGFIM.

A request that is submitted by telephone or by e-mail will not be considered to have been submitted pursuant to the terms of the *Privacy Act*. The CGFIM ATIP Coordinator will consider whether it is appropriate to process the request on an informal basis, in which case the requester will be offered that option along with an explanation that only formal requests are subject to the provisions of the *Privacy Act*.

CGFIM will make every reasonable effort to search records under the control of CGFIM to identify and locate the personal information that is responsive to the request.

CGFIM shall respond to the individual within thirty days of receipt of a formal request for access, subject to extension of time limits permitted in the *Privacy Act*, by:

- giving written notice as to whether access to the information or a part of the requested information will be given, and
- if access is to be granted, giving the requesting individual access to the information or part of the information, or
- if access is refused, giving written notice that (1) the personal information does not exist, or (2) the specific provision of the *Privacy Act* on which the refusal was based or the provision on which a refusal could reasonably be expected to be based if the information existed, and shall state that the individual who made the request has the right to make a complaint to the Privacy Commissioner of Canada about the refusal.

Access to personal information in the control of CGFIM will be subject to the permissive and mandatory exemptions set out in the *Privacy Act*. Under the guidance of the ATIP Coordinator, all requested personal information will be reviewed for the purpose of identifying and severing any portions excluded from the *Privacy Act* or which must be exempted, and for making a decision concerning disclosure of personal information which may be exempted, and which review will include all consultations with other government departments as required by Treasury Board

policy. Exemptions will be cited on the records unless doing so would reveal the exempted information or cause the injury upon which the exemption is based.

Prior to providing access to personal information, CGFIM shall require the requesting individual to provide adequate identification. CGFIM may require the individual to present him/herself in person for identification purposes.

If access is to be provided, CGFIM shall:

- permit the individual to examine the information by providing reasonable facilities for the examination and setting a time for the examination convenient for both CGFIM and the individual, or
- provide the individual with a copy of the information; and
- if the individual requests that the information be given in a particular official language of Canada and the personal information does not exist in that language and, if necessary, to enable the individual to understand the information, cause the information to be translated or interpreted for the individual;
- if the individual has a sensory disability and requests that access be given in an alternative format, if it is necessary to enable the individual to exercise his or her right of access and if it is reasonable to cause the information to be converted, provide the information in an alternative format acceptable to the individual.

CGFIM will consult with the appropriate institutions in all instances involving the application of sections 21, 22 and 23 of the *Privacy Act*.

CGFIM will aid, as required, to individuals in exercising their rights of access under the *Privacy Act*.

Personal Information Corrections and Notations Requests:

Every individual who is given access to personal information that has been used, is being used or is available for use for an administrative purpose is entitled to:

- request correction of the personal information where the individual believes there is an error or omission in the information;

- require that a notation be attached to the information reflecting any correction requested but not made, and
- require that any person or body to whom the information has been disclosed for use for an administrative purpose within two years prior to the time a correction is requested, or a notation is required: (1) be notified of the correction or notation, and (2) where the disclosure is to another government institution, the institution make the correction or notation on any copy of personal information under its control.

Formal requests for correction of personal information must be made through the ATIP Online Request Service website using this [link](#) or by submitting a completed [Correction Request Form](#) to the CGIFM ATIP Coordinator.

Where a correction is made by CGFIM pursuant to the request, within thirty days after receipt of the request, CGFIM will:

- notify the individual that the correction has been made;
- notify any person or body to whom the personal information has been disclosed as described in paragraph (a) “Access Requests” above that the correction has been made, and
- if the person or body to whom the personal information has been disclosed as described in paragraph (a) “Access Requests” above is another government institution, notify the appropriate officer of that institution of the requirement to make the correction on every copy of the personal information under the control of the institution.

Where a request for correction is refused by CGFIM in whole or in part, within thirty days after receipt of the request, CGFIM shall:

- attach a notation to the personal information reflecting that a correction was requested but was refused in whole or in part;
- notify the individual that (1) the request for correction has been refused in whole or in part and set out the reasons for the refusal, (2) the notation described above has been attached to the personal information, and (3) the individual has the right under the *Privacy Act* to make a complaint to the Privacy Commissioner of Canada;
- notify any person or body to whom the personal information has been disclosed as described in paragraph (a) “Access Requests” above that the required notation has been attached to the personal information, and notify the appropriate officer of any government institution to whom the personal information has been disclosed as described in (a) “Access Requests” above that the required notation has been attached to the personal information and that the officer is required to attach such a notation to every copy of the personal information under the control of the institution.

7. Inquiring about these Practices

Any questions, comments, concerns, or complaints you may have regarding CGFIM's practices and compliance with the *Privacy Act* may be directed to CGIM's ATIP Coordinator.

If you are not satisfied with our response to your privacy concern(s), you may wish to contact the [Office of the Privacy Commissioner](#) by telephone at 1-800-282-1376.

8. Contact Information for CGFIM ATIP Coordinator

Tammy Marer

Access to Information and Privacy Coordinator
1250 René-Lévesque Boulevard West, Suite 1400
Montreal, Quebec Canada
H3B 5E9

Email: ATIPCGF@cgf-fcc.ca

9. Updates to the Privacy Notice:

This Notice may be updated periodically to reflect changes to our personal information practices or applicable law. The revised Notice will be posted on the Website and in certain circumstances we may notify you of any changes by email. We encourage you to refer to this Notice often for the latest information about our personal information practices.

Part III: Definitions

In this Privacy Notice, the following terms have the following meanings:

“**administrative purpose**” means the use of an individual’s personal information in a decision-making process that directly affects that individual.

“**ATIP Coordinator**” means the CGFIM official appointed to this position.

“**personal information**” means information about an identifiable individual that is recorded in any form, including (without restricting the generality of the foregoing):

- information relating to the race, national or ethnic origin, colour, religion, age or marital status of the individual; information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- any identifying number, symbol or other particular assigned to the individual;
- the address, fingerprints or blood type of the individual;
- the personal opinions or views of the individual except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual by a government institution or a part of a government institution specified in the regulations under the *Privacy Act*;
- correspondence sent to a government institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to such correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the individual;
- the views or opinions of another individual about a proposal for a grant, an award, or a prize to be made to the individual by an institution or a part of an institution referred to in the fifth bullet above, but excluding the name of the other individual where it appears with the views or opinions of the other individual, and
- the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual.

For the purposes of use and disclosure of personal information described above strictly under the *Privacy Act*, “**personal information**” does not include:

- certain information about officers, employees of CGFIM and other government institutions that relates to the position or functions of the individual and business contact information, as set out in more detail in the *Privacy Act*;
- information about an individual who is or was performing services under contract for CGFIM that relates to the services performed, including the terms of the contract, the name of the individual and the opinions or views of the individual given in the course of the performance of those services;
- information relating to any discretionary benefit of a financial nature, including the granting of a license or permit, conferred on an individual, including the name of the individual and the exact nature of the benefit, and
- information about an individual who has been dead for more than twenty years.