Brompton Group Privacy Policy

The following privacy policy applies to Brompton Group which includes Brompton Corp. and Brompton Funds which for clarity includes Brompton Funds Limited and any company or trust which it manages or administers (collectively “Brompton”). This policy has been developed to communicate how Brompton may collect, use and disclose your personal information.

1. What personal information does Brompton collect?
   We collect personal information that you, or your financial advisor on your behalf, provide to us as well as personal information that we receive in connection with the administration of the entity in which you hold units or shares. This information may include your name, address, email address, unit holdings and social insurance numbers.

2. How do we use your personal information?
   We only use your personal information to: (i) provide you with any services or assistance you may request; (ii) respond to your inquiries and other needs; (iii) comply with all regulatory and other legal obligations; and (iv) provide you with information on products and services which we believe may interest you. If you currently receive information regarding other products and services and do not wish to continue receiving such information please contact, info@bromptongroup.com

3. To whom do we disclose your personal information?
   Your personal information will only be disclosed: (i) to the manager of Brompton funds in which you have invested; (ii) as may be necessary to meet regulatory and legal obligations; (iii) to third parties at your request, including your financial adviser (iv) to third party service providers who assist in the performance of services to you and (v) as may otherwise be permitted by law.

   Your personal information will not be sold. However, your information may be provided to a successor or an acquiror of a portion of the business, including the management of Brompton funds. Any such entity that obtains your personal information in these circumstances shall be bound by the obligations and protections described in this privacy policy.

4. How is your personal information protected?
   We are dedicated to the protection and safeguarding of your personal information. We maintain physical, electronic and procedural safeguards to protect the confidentiality of your personal information. We train our employees on our privacy obligations and ensure that they adhere to these obligations.

5. How can you update your personal information?
   We will contact you on an annual basis to ensure that we have your accurate mailing address and to confirm whether you wish to receive interim and annual financial statements. Should you wish to update this information at any time, please contact the privacy officer as described below.
6. **Where should you direct questions or access requests?**
   Please feel free to contact Kathryn Banner, the privacy officer, at 416-642-6005 or banner@bromptongroup.com, should you have any questions about this privacy policy or practices with respect to your personal information.

   If you wish to unsubscribe to any mailings, electronic or otherwise, or wish to access your personal information, please contact Kathryn Banner at banner@bromptongroup.com.

August 2015