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Project: Newport Private Wealth – New Website**

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| **Client: Newport Private Wealth** | **Created By: Elan** | |
| **Project: New Website 2024** | **Docket: NWPT-006 OCT23** | |
| **Requested By: Elizabeth** | **Date: February 20, 2025** | **Version: Privacy** |

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| ***Section Type:*** | **Section Title: Privacy** |
| ***Component*** | ***English*** |
| Meta | Tag  Newport Private Wealth: Protecting Your Privacy  Description  These are our policies and procedures regarding the collection, use and disclosure of information through the use of this website. |
| Header | Protecting Your Privacy |
| Body Copy | **Privacy and Use of the Site – Effective August 2023**  **Purpose of this Privacy Policy** Your privacy is important to us. Newport Private Wealth Inc. (“NPWI”, “we”, “our”, or “us”) has developed a Privacy Policy (the “Policy”) to inform you of our policies and procedures regarding the collection, use and disclosure of your personal information through the use of this website and social media sites which have their own privacy disclosure notices (see Social Media Notices below). By providing information to us through our website, you agree to be bound by the Policy. If you do not agree to the terms of the Policy, please do not use the website. The Policy may be updated from time to time at our sole discretion, without prior notice or liability to you and any other persons, and any updates will be posted to our Site. Because of this, when you use our webs sites, you should check the date of the Policy and review any changes since the last version.  **Why We Collect Information** Our primary reason for collecting information is to provide and improve our website, its features and content and allow users to enjoy and easily navigate the website.  **Types of Information We Collect and its Uses** While using our website, we may ask you to provide us with, or grant access to, or permission to obtain, certain personally identifiable information. This refers to information about you that can be used to identify you or contact you (“Personal Information”). For example, Personal Information may include information such as your name, phone number, email address and mailing address.  We may use your Personal Information to contact you by email with NPWI electronic publications, newsletters, or other marketing material and announcements (collectively referred to as communications) that may be of interest to you. This will be done in accordance with your permission and with applicable laws. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in the email communications you receive from us and we will remove you from our email mailing list.  When you use or visit our website, our servers automatically record information that your browser sends whenever you visit a website (the “Browser Data”). This Browser Data may include information such as your computer’s Internet Protocol (“IP”) address, pages of our website that you visit, the time spent on those pages, information you search for on our website, access times and dates and other statistical information. We use this information to monitor and analyze use of the website and for technical administration to enhance the functionality and user experience of our website.  **Use of Cookies** Like many websites, we use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard drive for record-keeping purposes. Persistent cookies are used to save your login information for future logins to the service on our web site. Session ID cookies are used to enable certain features of our web site, to get a better understanding of how you interact with the web site and to monitor aggregate usage by NPWI users and web traffic routing on the web site. Unlike persistent cookies, session ID cookies are deleted from your computer when you log off from the web site and then close your browser. By changing its options, you can instruct your browser to stop accepting cookies or to prompt you before accepting cookies from the website you visit. However, if you do not accept cookies, you may not be able to use all portions of the web site.  **Other Ways to Contact Us** If you are concerned about the disclosing your information via the Internet and prefer not to use our website, you may contact us by telephone, fax, regular mail, or in person.  **Global Data Management** We are a Canadian firm; however, our website can be accessed from countries around the world. By using the websites to provide Personal Information to us, users who access our website outside of Canada acknowledge and agree that Personal Information will be processed outside your country of residence. For individuals residing in the European Economic Area (“EEA”) with Personal Data subject to European data protection laws, we will take steps to ensure Personal Information is handled in accordance with the Global Data Protection Regulations (“GDPR”).    **Information Sharing and Disclosure**  **Service Providers** We may employ third party companies and individuals, in and/or outside of Canada, to facilitate our website, on our behalf and to perform website-related services like maintenance services, web analytics and database management. Third-party service providers will only be granted access to your Personal Information to perform these services on our behalf and are contractually bound to safeguard and maintain the confidentiality of such information.  **Compliance with the Law** NPWI cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose your Personal Information in response to a request from a government agency, regulatory body or legal authority if the law requires or permits us to do so. We may also disclose information when we believe it is necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and others including as part of an investigation, and to prevent death or imminent bodily harm.  **Business Transfer** We may sell, transfer or share part or all of our assets, including your Personal Information, with another organization in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.  **Changing or Deleting your Personal Information** You may at any time review, update, correct or delete the Personal Information provided to us by contacting us at [privacy@newportprivatewealth.ca](mailto:privacy@newportprivatewealth.ca) with such request. We may retain an archived copy of your records as required by law or for legitimate audit or business purposes..  **Security** NPWI takes the security of your Personal Information very seriously however, that no method of transmission over the Internet, or method of electronic storage is 100% secure. We take appropriate measures to ensure that personal information is kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.  We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so. We will make any legally required disclosures of any breach of the security, confidentiality or integrity of your Personal Information in the most expedient time possible and without unreasonable delay, taking into consideration the legitimate needs of law enforcement or any measures necessary to determine the scope of the breach and restoring the reasonable integrity of our data system.  The length of time we keep your personal information will vary depending on the product or service you require. We keep your information for as long as we reasonably need it for administrative, legal or reasonable business purposes. For these reasons, we keep your information beyond the end of your relationship with us, generally seven years. When your information is no longer required, we securely destroy it or delete personally identifiable information.  **Third-Party Sites and Services** Our website may contain links to other websites. We are not responsible for the practices employed by any websites or services linked to or from our website, including the information or content contained within them. Please remember that when you use a link to go from our website to another website or service, our Privacy Policy does not apply to those third-party websites or services. You use that third-party website or service at your own risk.  **Privacy Questions** If you have any questions about this Privacy Policy please contact us by email at [privacy@newportprivatewealth.ca](mailto:privacy@newportprivatewealth.ca) or by phone at 416-867-7555 or 1-866-534-5402 or by mail at:  Pamela Brenman Privacy Compliance Officer Newport Private Wealth Inc. 469 King Street West, 4th Floor, Toronto, ON M5V 1K4    **Other Important Information**  **Personal Information Protection and Electronic Documents Act (“PIPEDA”) and Canadian Anti-Spam Legislation (“CASL”)** We protect and use your information by observing principles and guidelines in PIPEDA and CASL. We obtain either express or implied consent or use other lawful mechanisms to send commercial electronic messages as is defined by CASL. If we intend to use your personal Information for a new purpose, we will contact you to obtain the appropriate consent. If you choose to “opt-out” of receiving our emails, you will be unsubscribed upon your request.  **Electronic Communications** Electronic communications are not to be construed as professional advice. Delivery of them to you will not initiate a professional relationship between you and NPWI, or any other recipient. Electronic communications are meant to provide access to information and provide general interest knowledge without reference to specific facts or circumstances. If an electronic communication from NPWI raises any point of interest, please feel free to contact our office for additional information.    **Social Media Notice 2023**  **Overview** Newport Private Wealth Inc’s (“NPWI”, “We”) social media accounts on Twitter, LinkedIn, Blog and YouTube are intended for general information purposes only. Information provided does not constitute a recommendation to buy or sell any financial product or service, and is not intended to provide specific personalized advice, including, without limitation, investment, financial, legal, accounting or tax advice. Please consult an appropriate tax and/or investment professional regarding your circumstances.  **Third-party platform terms and conditions** NPWI’s social media pages are on third-party platforms. You acknowledge that your use of NPWI’s social media sites is governed not only by our guidelines, but also by the terms and conditions of these social media platforms. Please read the respective platform’s terms of service, privacy policies and cookie policies. The amount of information about a user that is available publicly depends on the user’s privacy settings.  **Your privacy** NPWI reminds users to regularly check and adjust individual privacy settings, as they may change over time. Comments and/or replies left by individuals on NPWI’s social media platforms can be read by anyone. Therefore, we strongly advise users not to post personal information, either their own or the information of others, on our social media sites.  **Use of information** We may use information provided on social media – including, but not limited to, opinions contained in your comments, replies or messages to us – for statistical or analytical purposes.  **No financial advice and information is subject to change** Information on our social media accounts are believed to be reliable. Where such information is based in whole or in part on information provided by third parties, we cannot guarantee that it is accurate, complete or always current. Graphs, charts and graphics are used for illustrative purposes only and do not reflect future values or returns on investment of any fund or portfolio. Investment strategies should be evaluated according to an investor’s investment objectives and tolerance for risk. Any products and services, including investment, trading or tax strategies, must be evaluated relative to everyone’s goals, objectives and risk tolerance. NPWI and its affiliate are not liable for any errors or omissions in the information or for any loss or damage suffered.  Management fees are associated with assets invested by NPWI. Returns are not guaranteed; their values change frequently, and past performance may not be repeated.  Certain NPWI content on our social media accounts may contain forward-looking statements (“FLS”) that are predictive in nature and may include words such as “expects,” “anticipates,” “intends,” “plans,” “believes,” “estimates” and similar versions of forward-looking expressions. FLS presented are based on current expectations and projections about future general economic, political and relevant market factors, such as interest rates and excludes future changes to applicable laws or government regulation. FLS are not guarantees of future performance, and projections may differ materially from those expressed or implied are subject to risks and unforeseeable uncertainties. You should avoid placing any undue reliance on FLS. Additionally, there is no specific intention of updating any FLS because of additional information, future events or otherwise. Before making any investment decisions, we encourage you to consider all relevant factors carefully and consult with a professional.  **No endorsement** NPWI’s social media accounts may follow other users, share or provide hyperlinks to third-party content, and “like/favourite” third-party content. Doing so is intended to provide additional perspective and should not be construed as an endorsement of any individuals, services, products, guidance or points of view. Comments and opinions posted by users are the responsibility of the person who posts them. NPWI does not endorse or guarantee the accuracy of the content posted by others. Any opinions expressed by our followers are those of the persons submitting the comments and do not necessarily represent the views of NPWI and its affiliates.  **Consequences of non-compliance** NPWI reserves the right to block any follower who posts or retweets content that is deemed inappropriate or offensive or that constitutes a testimonial, advice, recommendation or advertisement for securities, products or services or that is promotional in nature. We also reserve the right to block followers whose social media pages contain offensive or inappropriate content or serve as promotional sites. We reserve the right to review, edit, remove and/or report any posts, comments or replies deemed defaming, misleading or inappropriate, or that are in violation of these notices, our copyright, trademark and other legal policies.  Should you have any questions about our social media notices, please email us at [socialmedia@newportprivatewealth.ca](mailto:socialmedia@newportprivatewealth.ca).    **Privacy Policy & Commenting Policy for Social Media Accounts**  Protecting your privacy is priority for us. Any information you provide to us via social media (either through public areas or private message) is kept confidential in our records and will be used to help us better understand the interests and needs of individuals like you who choose to communicate with NPWI through our social media channels. In NPWI’s records, access to any personal information you may post in your comments will be restricted to those employees, representatives and third-party service providers who are responsible for the administration of our social media sites. We take appropriate measures to ensure that personal information is kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so. To find out about our Privacy Policy, visit our website at [www.newportprivatewealth.ca](https://newportprivatewealth.ca/). To obtain information about our privacy practices, send a written request by e-mail to [privacy@newportprivatewealth.ca](mailto:privacy@newportprivatewealth.ca) or by mail to Privacy Compliance Officer, Newport Private Wealth, 469 King Street West, 4th Floor, Toronto, Ontario M5V 1K4.  By posting a public comment, you acknowledge and agree that it is not confidential and, if you are not the original author, you have permission to post it. By posting it, you are also giving NPWI the right to re-use it in any way. From time to time, NPWI may, at its discretion, modify this Commenting Policy.  NPWI reserves the right to remove any comments that it views to be in violation of any of the following guidelines:   * **Protect your privacy** Any comments or posts to the public areas of our social media sites should not include personal or sensitive information. This includes account numbers, email addresses, phone numbers and mailing addresses. NPWI will take steps to remove (or encourage you to remove) public comments that include personal information. Although private messages via the social media platform are not accessible to the public at large, NPWI strongly recommends you use caution when sharing personal information through the social media platform. All your activity on a social media platform is subject to that site’s current terms and conditions, along with their privacy and data security practices and policies. These platforms are not affiliated with NPWI and may have practices and policies that are different from our own. For more information on NPWI’s commitment to privacy, please visit the privacy policy on our web site. * **Respect others** Please do not publicly identify or reference information about others that has not been voluntarily made available by them in a public post. This includes, but is not limited to, NPWI employees or portfolio managers. * **Content Restrictions** All applicable laws including copyright laws must be followed. Do not use racist, sexist and/or offensive language. Personal attacks are not permitted. Any comments that are abusive, hateful or of a defamatory nature are not permitted. Do not post a comment that breaks the law or encourages unruly behavior. Do not include false information. Do not include links to any content with a virus or other harmful component. NPWI is not responsible if there are any claims from third parties related to your comments on our social media channels. * **Be relevant and considerate** We ask that you please keep your comments relevant to the topic of conversation. NPWI will determine if a comment is off topic at its sole discretion, and if appropriate, remove it. Comments that include solicitations will be deleted. * **Posts are subjects to removal** NPWI reserves the right to delete/hide any comments that it views to be in violation of this Commenting Policy. We may ban repeat offenders from our social media channels and/or those committing significant violations of these policies. |