



Cordiant Capital Inc.	Privacy Policy: Canada
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Owner: Privacy Officer (CCO)  
Applies to: Canada / Québec

Cordiant Capital Inc. (“Cordiant”, “we”, “us” or “our”) is committed to protecting personal information entrusted to us. This Privacy Policy explains how we collect, use, disclose, retain and protect personal information in connection with our activities in Canada and through the Canadian section of our website.

This Policy describes how Cordiant handles personal information in connection with its activities in Canada and is published in the Canadian section of our website. It is intended to comply with the personal information protection obligations applicable to Cordiant in Canada, including:

- the Act respecting the protection of personal information in the private sector (Québec), as amended by Law 25;
- the Personal Information Protection and Electronic Documents Act (Canada), “PIPEDA”;
- the Personal Information Protection Act (British Columbia) and the Personal Information Protection Act (Alberta), where applicable;
- Canada’s Anti-Spam Legislation, “CASL”, in respect of commercial electronic messages; and
- the Act respecting the legal framework for information technology (Québec), where applicable.

Cordiant is part of an international group and, in the course of its activities, personal information may also be subject to the privacy laws of other jurisdictions. Those laws are not addressed by this Policy, which is limited to Cordiant’s activities in Canada. Where the privacy laws of another jurisdiction apply to a particular individual or activity, Cordiant addresses those requirements separately and a different or additional privacy notice may apply.

## 1. Person responsible for the protection of personal information

Cordiant has designated a person responsible for the protection of personal information, the “Privacy Officer”. The Privacy Officer oversees this Policy, supports compliance with applicable privacy laws and handles privacy-related requests and complaints.

Privacy Officer: Vincent Mascolo, CPA, CIM, Chief Compliance Officer

Email: [compliance@cordiantcap.com](mailto:compliance@cordiantcap.com) | Telephone: +1-514-286-4612

Cordiant Capital Inc., 1002 Sherbrooke Street West, Suite 2800, Montréal, Québec H3A 3L6

## 2. What is personal information

Personal information means information, in any format, about an identifiable individual. It may include information that directly identifies a person and information that can identify a person when combined with other information.



Personal information does not generally include business contact information used solely to communicate with an individual in a professional capacity, or information that has been anonymized in accordance with applicable law.

### **3. Personal information we collect**

Depending on your relationship with us, we may collect the following categories of personal information:

- identification and contact information, such as name, address, telephone number and email address;
- identity-verification information, such as date of birth, government identifiers, signatures and copies of identity documents, where required by law;
- financial and investment-related information, such as investment objectives, transaction history and investor classification information;
- regulatory compliance information, including know-your-client, anti-money laundering, sanctions, fraud-prevention and tax information;
- information about authorized representatives, beneficial owners, beneficiaries, directors, officers or other related persons;
- employment and recruitment information, where you apply for a position with Cordiant; and
- technical information collected when you use our website, such as IP address, browser type, device information, pages viewed and cookie preferences.

Some information is required to provide services, administer our business relationship or meet legal and regulatory obligations. If required information is not provided, we may be unable to provide or continue a service or business relationship.

### **4. How we collect personal information**

We collect personal information from several sources, including:

- directly from you, including through onboarding documents, subscription documents, forms, identity documents, correspondence and communications with our personnel;
- from third parties, including custodians, financial institutions, fund administrators, referral sources, service providers, regulators, public databases and sanctions or screening databases, where permitted by law; and
- automatically when you use our website, including through cookies and similar technologies, as described below.

### **5. Cookies and similar technologies**

Our website may use cookies and similar technologies to operate the website, maintain security, remember preferences and measure website usage.

Technologies that include functions allowing an individual to be identified, located or profiled are not activated by default. Where such functions are used, we will inform you of the use of the technology and of the means available to activate those functions, and we will obtain consent where required by law.



You may manage your cookie preferences through the cookie settings available on our website, where applicable, or through your browser settings. Disabling certain cookies may affect how the website functions.

## 6. Why we collect and use personal information

We collect and use personal information for identified and legitimate purposes, including to:

- provide, administer and support our services and business relationships;
- open and maintain investor, fund, client or counterparty records;
- verify identity and perform know-your-client, anti-money laundering, sanctions, tax and other regulatory checks;
- process transactions, capital calls, distributions, reporting and related communications;
- manage business operations, information security, governance, audits, risk management, compliance and recordkeeping;
- respond to requests from regulators, tax authorities, law enforcement and other competent authorities, including the AMF, FINTRAC, the SEC and similar authorities;
- manage recruitment and hiring;
- improve our website, systems and services, using de-identified information where appropriate; and
- send relationship, administrative or marketing communications, subject to your preferences and applicable law.

## 7. Consent

We collect, use and disclose personal information with consent, unless the law allows or requires us to do so without consent. Consent must be clear, free and informed, and must be given for specific purposes. It is valid only for the time necessary to achieve the purposes for which it was requested.

Consent may be express or, where permitted by law, implied from the context. We seek express consent for sensitive personal information, unless another legal basis applies.

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. If you withdraw consent, we will explain the consequences, which may include our inability to provide or continue certain services.

We will obtain consent again before using personal information for a purpose that is not compatible with the purposes initially identified, unless otherwise permitted by law.

## 8. When we disclose personal information

We may disclose personal information to the following persons or organizations where necessary for the purposes described in this Policy, or where required or permitted by law:

- entities within the Cordiant group;
- fund administrators, custodians, transfer agents, banks, financial institutions, counterparties and other parties involved in fund or investment operations;
- information technology, hosting, cybersecurity, portfolio management, accounting, recordkeeping and communication service providers;



- professional advisers, auditors, legal counsel, consultants and insurers;
- regulators, self-regulatory organizations, tax authorities, law enforcement and other competent authorities; and
- other persons or organizations with your consent or as otherwise permitted by law.

We require service providers that process personal information on our behalf to protect that information and to use it only for the purposes for which it was provided. We do not sell personal information.

## 9. Transfers outside Québec and Canada

Some of the persons or organizations described above may be located outside Québec or Canada, including in the United States, the United Kingdom, the European Union, including Luxembourg, and Brazil. Personal information may therefore be stored or processed in those jurisdictions and may be subject to the laws of those jurisdictions.

Before communicating personal information outside Québec, Cordiant conducts a privacy impact assessment where required by Québec law to determine whether the information will receive adequate protection, taking into account the sensitivity of the information, the purposes of the communication, the safeguards in place and the legal framework of the receiving jurisdiction.

Cordiant also uses contractual, organizational and technical safeguards designed to protect personal information transferred outside Québec or Canada.

## 10. How long we keep personal information

We keep personal information only for as long as necessary to fulfill the purposes for which it was collected, or for a longer period where required or permitted by applicable law, including securities, anti-money laundering, tax, employment and recordkeeping requirements.

When personal information is no longer required, we securely destroy it or anonymize it in accordance with applicable law and our record retention procedures.

## 11. How we protect personal information

We protect personal information using safeguards that are reasonable and proportionate to the sensitivity of the information. These safeguards may include:

- physical measures, such as secure offices and restricted access to records;
- organizational measures, such as internal policies, confidentiality obligations, employee training and need-to-know access controls; and
- technological measures, such as access controls, encryption, monitoring, secure storage, backups and cybersecurity tools.

No method of transmission or storage is completely secure. We nevertheless take reasonable measures to protect personal information against loss, theft, unauthorized access, disclosure, copying, use or modification.



## 12. Automated decision-making

We do not make decisions about individuals based exclusively on automated processing where the decision produces legal effects or otherwise significantly affects the individual, without meaningful human involvement.

If we were to use personal information to make such a decision, we would inform the individual in accordance with applicable law and provide the opportunity to submit observations, request correction of personal information used to make the decision and obtain information about the decision process, as required by law.

## 13. Your rights

Subject to applicable law, you may have the right to:

- access the personal information we hold about you;
- request correction of personal information that is inaccurate, incomplete or ambiguous;
- withdraw consent, subject to legal or contractual restrictions;
- request that we stop disseminating personal information or de-index a hyperlink where the conditions under applicable law are met;
- request information about our use of automated decision-making, where applicable; and
- receive computerized personal information that you have provided to us in a structured and commonly used technological format, where the right to portability applies.

To exercise your rights, please contact the Privacy Officer using the contact information in Section 1. We will respond within 30 days after receiving your request, unless the law permits or requires a different period.

Access to personal information is generally provided free of charge. A reasonable fee may apply for transcription, reproduction or transmission. If a fee applies, we will inform you in advance.

## 14. Privacy incidents

Cordiant maintains procedures to identify, assess, contain and respond to confidentiality incidents involving personal information. We also maintain a register of confidentiality incidents as required by law.

Where a confidentiality incident presents a risk of serious injury, Cordiant will notify the Commission d'accès à l'information du Québec and affected individuals as required by law. Cordiant will also take reasonable measures to reduce the risk of harm and prevent similar incidents from occurring again.

## 15. Questions and complaints

If you have a question, concern or complaint about how Cordiant handles personal information, please contact the Privacy Officer first. We will review the matter and respond within a reasonable time.

If you are not satisfied with our response, you may file a complaint with the Commission d'accès à l'information du Québec, CAI, or the Office of the Privacy Commissioner of Canada, OPC, where applicable.



## **16. Business contacts and adults**

Our services and this website are directed to institutional investors, business contacts and adults. They are not intended for children or minors.

We do not knowingly collect personal information from minors. If we become aware that we have collected personal information from a minor, we will take appropriate steps to address the situation in accordance with applicable law.

Where consent is required for the collection, use or disclosure of personal information concerning a minor, we will obtain the required consent from the person authorized by law.

## **17. Changes to this Policy**

We may update this Policy from time to time. The current version will be available on our website. The “Last updated” date indicates when the Policy was last revised.

Material changes will be communicated as required by applicable law.

## **18. Contact us**

For any privacy matter, please contact:

Vincent Mascolo, CPA, CIM, Chief Compliance Officer and Privacy Officer

Email: [compliance@cordiantcap.com](mailto:compliance@cordiantcap.com) | Telephone: +1-514-286-4612

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