

## ACCESS TO INFORMATION

### Access to Your Personal Information

You may ask your investment representative for access to any personal information we hold about you. If that is not satisfactory you may contact the firm's Privacy Officer. Summary information is available on request. More detailed requests that require archive or other retrieval costs may be subject to a fee.

### Correcting Errors

If we hold information about you that is not accurate, complete and up-to-date, we will take all reasonable steps to correct it. If the information cannot be changed your request and our decision will be noted in your file.

### Exceptions to Access

We will make every effort to provide you with access to your personal information. However, in certain circumstances it may not be possible. In any case where we are unable to or cannot grant you access to your personal information we will provide you with reasons on request. These exceptions may include but are not limited to:

- a) Information that is prohibitively costly to provide;
- b) Information that has been destroyed;
- c) Information that would reveal confidential commercial information, and which cannot be severed for disclosure;
- d) For other legal and security reasons which relate to the enforcement of any law of Saskatchewan or Canada.

### Communicating with Us

E-mail and cell phone communications are not 100% secure mediums, and you should be aware of this when contacting us to send personal or confidential information.

## CASL

### Restrictions on Electronic Communications

We are committed to complying with CASL and recognize the restrictions under CASL with respect to sending electronic marketing materials.

### Consent

We recognize that, pursuant to CASL, we may not send commercial electronic messages unless the recipient has either provided express or implied consent to receiving that type of message.

Implied Consent. We will only send electronic marketing materials to individuals who have an existing business relationship with us.

Express Consent. Where we do not have an existing business relationship with an individual, express consent by non-electronic means will be obtained prior to sending any electronic marketing materials.

### Tracking Opt-outs

We will provide you with the ability to opt-out of the receipt of electronic communications at any time.

## CHALLENGING COMPLIANCE

### Requests for Access or Complaints

Our Fund Manager, Westcap Mgt. Ltd. administers this Privacy Policy on behalf of Golden Opportunities Fund Inc. If you have any questions, or complaints or wish to access your personal information, please write to our Privacy Contact at:

Privacy Officer  
Golden Opportunities Fund Inc.  
C/O Westcap Mgt. Ltd.  
Suite 830  
410 – 22nd Street East  
Saskatoon, Saskatchewan  
Canada, S7K 5T6  
Phone: 1-306-652-5557  
Fax: 1-306-652-8186

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

Privacy Commissioner of Canada  
112 Kent Street  
Ottawa, Ontario  
K1A 1H3  
Toll Free: 1-800-282-1376

### Changes to this Privacy Policy

Since we regularly review all of our policies and procedures, we may change our Privacy Policy from time to time.

### Website

Our website may contain links to other sites, which are not governed by this privacy policy. On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.



**PROTECTING YOUR PRIVACY**

# Our Commitment to Privacy and Confidentiality

Golden Opportunities Fund Inc. has a “longstanding” commitment to the protection of your privacy and confidential information. Consistent with the requirements of our industry we adhere to the duty to hold in strict confidence all information concerning our clients gathered in the course of our relationship, and not to divulge such information unless express or implied authorization is received by the client, required by law, or otherwise permitted or required. We are committed to complying with the ten privacy principles in the *Personal Information Protection and Electronic Documents Act* and Canada’s Anti-Spam Legislation (CASL) as set out below.

## ACCOUNTABILITY

We are responsible for the personal information we collect. Our firm stores and maintains your personal information in conformity with the requirements and principles of the *Personal Information Protection and Electronic Documents Act*. To ensure our accountability we have developed this privacy policy and trained our staff to permit them to implement and observe this and other policies and practices and we have appointed a Privacy Officer for the firm.

## IDENTIFYING PURPOSES

### What is Personal Information?

Personal information is information about an identifiable individual, but business contact information (such as an individual’s job title, business address or business telephone number) is not treated as personal information in certain cases.

### Why Do We Collect Personal Information?

We are required by various laws to collect certain personal information in order to establish an investment account for you. Your personal information may be used to:

- a) Open an investment account;
- b) Identify you;
- c) Execute transactions for you;
- d) Provide you with tax receipts, fund information, proxy materials, trade confirmations, and other information that you may request or require;
- e) Meet legal and regulatory requirements;
- f) Maintain accuracy of our records as required by law;
- g) Maintain information on your account regarding holdings, transactions, and contributions;
- h) Provide you with account statements.

## How Do We Collect Your Personal Information?

When you, as an individual, invest in our products, your investment representative provides us with your personal information. The information collected from you is retained in our client records. We collect and use this information to service your accounts and respond to your requests. The personal information we collect falls into the following three categories:

- a) Information we receive from you on applications in writing or electronically. This information may include your name, home mailing and e-mail address, social insurance number, beneficiary information, employment information and possibly your personal bank account information.
- b) Information about your transactions and account history with Golden Opportunities Fund. This category also includes communications to us concerning your investment/account.
- c) Other general information that we may obtain about you such as demographic information.

## CONSENT

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally, we ask for your consent in writing as on an application form, but in some circumstances, we may accept your oral consent. The only exceptions to these would be where the use, collection, or disclosure is for security or legal reasons.

## LIMITING COLLECTION

We do not collect more information about our clients than is required for the purposes we identify to our clients. Clients’ personal information is collected by fair and lawful means and only as required to provide our services.

## LIMITING USE, DISCLOSURE AND RETENTION

### Limiting Use and Disclosure

Only authorized individuals are provided with your information and it is used exclusively for our identified purposes. We disclose the information only where it is necessary to provide our services, however, under certain circumstances, we may be legally obliged to disclose your personal information without your knowledge or consent.

### Disclosure of Your Personal Information

On occasion, we may disclose your information to your investment representative. When we share your information, we strive to maintain your privacy. Only pertinent information may be disclosed to the following agents and organizations:

- a) Investment representatives or dealers;
- b) Canadian and Saskatchewan governments and government agencies;
- c) Canada Post;
- d) Our back office service provider;
- e) Our lawyers and accountants; and
- f) Account statement preparation and mailing companies, courier companies, and document storage companies.

## Information Retention and Destruction

We maintain your personal information for as long as is required by statute or regulation. Where there is more than one requirement for the duration of record retention, the longer period will be observed. Upon expiration of the applicable retention period, your personal information will be disposed of in a secure manner.

## ACCURACY

### Accuracy

At Golden Opportunities Fund Inc., we will keep your information accurate and up-to-date as required for the purposes for which it is to be used.

### Updating Your Information

If any of your information changes, please inform your investment representative or contact our firm directly so that any necessary changes can be made.

## SAFEGUARDS

### How Is Your Personal Information Secured?

We take all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- a) Premises security, including locks and restricted access;
- b) Restricted file access to personal information;
- c) Deployment of technological safeguards like firewalls to prevent hacking or unauthorized computer access;
- d) Internal password and security policies;
- e) Confidentiality agreements with third parties.

## OPENNESS

Upon written request, we will make available additional information regarding our personal information policies.