

## **New Market Funds – Privacy Policy**

*Updated July 2018*

BEFORE USING OUR SITES, PLEASE READ THIS PRIVACY POLICY CAREFULLY.

This Privacy Policy is applicable to New Market Funds Inc. ("Company") and sets out our policy on the gathering and use of information on all of our sites (collectively "Sites"), including [www.newmarketfunds.ca](http://www.newmarketfunds.ca), [www.newcommons.ca](http://www.newcommons.ca), [www.communityforwardfund.ca](http://www.communityforwardfund.ca), <http://ccif.coop>. The Company is committed to providing safe web sites for visitors of all ages and has implemented this Privacy Policy to demonstrate our firm commitment to your privacy. This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Sites. The Company complies with Canadian Federal and Provincial privacy laws and regulations including the Personal Information and Electronic Documents Act.

There may be links from our Sites to other web sites not listed above; note that this Privacy Policy applies only to our Sites and not to web sites of other companies or organizations to which our Sites may be linked. You must check on any linked sites for the privacy policy that applies to that site and/or make any necessary inquiries in respect of that privacy policy with the operator of the linked site. These links to third party websites are provided as a convenience and are for informational purposes only. The Company does not endorse, and is not responsible for, these linked websites.

Although you are not required to register to access our Sites, you may be asked to provide us with personal information when you visit certain sections of our Sites. **Your use of our Sites signifies your acknowledgement and consent to our Privacy Policy as outlined below, and any changes in effect at the time of use. If you do not agree to this Privacy Policy, please do not continue to use our Sites.**

### **Personal Data We Collect and Why**

Personal Information is information about you that identifies you as an individual, for example, your name, address, e-mail address, or telephone number.

#### *Data Collected*

The only data we collect from visitors to our website is that provided voluntarily by the visitor when he or she completes and submits any of the site contact forms. This data includes first and last name, phone number, email address, organization name, type of investor/organization, organization focus, estimated financing needs and any comments left in the message box.

We may collect data from visitors to our website in order to collect feedback on how our site is serving the needs of our potential partners and investors. This data is not individualized and only show aggregate figures for all visitors. This data can include IP address, pages viewed, duration of site or page visits, type of device used to access the site, whether a visitor is new or returning, device location and URLs that refer visitors to our site. The service that collects this visitor data may share it with additional third-party tracking services.

### *Why We Collect Data*

The data visitors elect to provide in our contact forms help us to better understand their needs or interests, initiate an informed conversation and contact the visitor who contacted us.

### *Contact Forms & Cookies*

The Company, in common with many web site operators, may use standard technology called "cookies" on its Sites. Cookies are small data files that are downloaded onto your computer when you visit a particular web site. You can disable cookies by turning them off in your browser; however, some areas of the Sites may not function properly if you do so.

If you fill out the contact form on our site, you may opt-in to saving your name, email address and phone number in cookies. These are for your convenience so that you do not have to fill in your details again if you fill out another form. These cookies will last for one year.

### *Embedded Content from Other Websites*

Our Sites may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

### **Data Sharing, Protect and Rights**

We have put in place physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect online. The Company applies security safeguards appropriate to the sensitivity of the information, such as retaining information in secure facilities and making personal information accessible only to authorized employees on a need-to-know basis.

### *How We Protect and Share Data*

For users that complete the contact form(s) on our website, we store the personal information they provide in their user profile within our customer relationship manager system indefinitely. All users at our company can see, edit, or delete this personal information at any time. Website administrators can also see that information. The information is password protected and only accessible to employees of New Market Funds.

Visitor contact form contents may also be checked through an automated spam detection service.

The Company will not disclose personal information that you provide on its Sites to any third parties other than to a Company agent except: i) in accordance with the terms of this Privacy Policy, or ii) to comply with legal requirements such as a law, regulation, warrant, subpoena or

court order, and/or iii) if you are reporting an adverse event/side effect, in which case the Company may be required to disclose such information to bodies such as, but not limited to, Canadian and/or international regulatory authorities. Please note that any of these disclosures may involve the storage or processing of personal information outside of Canada and may therefore be subject to different privacy laws than those applicable in Canada, including laws that require the disclosure of personal information to governmental authorities under circumstances that are different than those that apply in Canada.

#### *What Rights You Have Over Your Data*

If you have filled out a contact form on our site, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal or security purposes.

#### **Protection of Children Online**

The Company considers the protection of children's privacy, especially online, to be of the utmost importance. We do not knowingly collect or solicit personal information from children nor do we allow them to become registered users of, or to request information through, our Sites or help-seeking information lines.

#### **Changes to This Policy**

If we alter our Privacy Policy, any changes will be posted on this page of our Site so that you are always informed of the information we collect about you, how we use it and the circumstances under which we may disclose it. Revisions will be effective upon posting to this page. Continued use of our Sites following the posting of any revisions to this Privacy Policy will mean you accept those changes. Please check this Privacy Policy periodically for any changes.

#### **Acceptance of Our Privacy Policy**

**By using this Site or any other Company Site or interactive banner ads, you signify your acceptance of our Privacy Policy, and you adhere to the terms and conditions posted on the Site. By submitting your information, you agree that it will be governed by our Privacy Policy.**