

## SEDAR+ PRIVACY STATEMENT

**This Privacy Statement was last updated on April 28, 2023**

This Privacy Statement explains the Alberta Securities Commission's (the "**ASC**") practices relating to the collection, use and disclosure of personal information on SEDAR+ and the SEDAR+ Public Website.

The System for Electronic Data Analysis and Retrieval + ("**SEDAR+**") is operated on behalf of and for the benefit of the Canadian provincial and territorial securities regulatory authorities (collectively the "**CSA**", and each a "**CSA Member**") by a representative subset of CSA Members comprised of the ASC, l'Autorité des marchés financiers, the British Columbia Securities Commission and the Ontario Securities Commission. SEDAR+ enables various persons (each an "**Electronic Filer**") to electronically transmit documents pursuant to securities legislation or securities directions to one or more CSA Members ("**Electronic Filings**"). SEDAR+ also contains information about certain regulatory actions, including cease trade orders and disciplinary decisions made against individuals and companies (collectively, "**Regulatory Actions**").

The "**SEDAR+ Public Website**" is the publicly accessible portions of SEDAR+ that contain and make available to the public (each a "**Public User**") those parts of the Electronic Filings, Regulatory Actions and other public information that the CSA has determined to make publicly available, together with certain proprietary content.

The ASC is the representative securities regulatory authority authorized to grant licenses and enter into agreements with third parties relating to the access and use of SEDAR+ and the SEDAR+ Public Website.

By accessing or using SEDAR+ or the SEDAR+ Public Website (or any content therein), or by otherwise indicating your acceptance of and agreement to this Privacy Statement, you (on your own behalf and on behalf of any entity you represent) consent to the collection, use and disclosure of personal information as set out below and for the purposes set out below. **If you do not accept or agree to this Privacy Statement, do not access or use SEDAR+ or the SEDAR+ Public Website (or any content therein).**

### **Collection, Use and Disclosure of Personal Information**

CSA Members are subject to the applicable public sector privacy legislation of the CSA Member's jurisdiction and collect, use and disclose personal information as authorized by statute, for the purposes of law enforcement or as necessary to the proper administration of a lawfully authorized program or activity.

SEDAR+ and the SEDAR+ Public Website collect information that may contain personal information in a number of ways, including: (1) information that is collected automatically through your use of SEDAR+ and the SEDAR+ Public Website, and (2) information that you actively provide to SEDAR+ and the SEDAR+ Public Website.

## ***Information Collected and Stored Automatically***

For all user types, when you use SEDAR+ or the SEDAR+ Public Website we automatically collect certain information about your use as described below.

### Logs

Our logs automatically record information about the use of SEDAR+, including the following information:

- the IP address being used
- which web page(s) within SEDAR+ are visited (including date and time)
- what content within SEDAR+ is downloaded (including date and time)

### Use of Cookies

We also use session and persistent cookies to a limited extent that collect and store information:

1. **Session Cookies:** When cookies are enabled, information about user activities on SEDAR+ or the SEDAR+ Public Website is temporarily stored in memory. Once users leave the website or close their web browsers this information is deleted. Session cookies we use include cookies to ensure secure sessions and consistent navigation through the application.
2. **Persistent Cookies:** When cookies are enabled, persistent cookies store information on the user's hard drive until the user deletes them or SEDAR+ or the SEDAR+ Public Website expires them. This would include information to "auto-fill" forms or remember search criteria or other information you previously used on the site.

Your web browser may allow you to disable cookies. However, disabling cookies can have an impact on your user experience or impair functionality. If cookies are disabled, each time a user visits SEDAR+ or the SEDAR+ Public Website they will be treated like a new visitor because nothing is stored in their browser to let us know they have visited before.

### Security Monitoring

For site security purposes and to ensure that this service remains available to all users, SEDAR+ employs software programs to monitor network traffic to identify unauthorized attempts to access, upload or change information, or otherwise cause damage.

We collect and use this automatically collected information in order to enable functionality of SEDAR+ and the SEDAR+ Public Website and to operate, protect, maintain and improve SEDAR+ and the SEDAR+ Public Website.

## ***Information You Actively Provide***

### Information from Public Users using the SEDAR+ Public Website

When a Public User signs up for any subscription services, such as alerts, we collect your email address and details about your subscription. We use this information for the purpose of operating the subscription services and communicating with you regarding these services.

### Information from Electronic Filers using SEDAR+

If you are an Electronic Filer using SEDAR+, we collect personal information that you provide when you create and maintain your account on SEDAR+. Examples of information that may be collected this way include: your name, email address, civic and postal address, telephone number, information about the filer or filing agent, profile data, account settings, and payment information (including for credit card payments and electronic fund transfer/pre-authorized debit). We use this information in order to operate SEDAR+, to process your transactions through SEDAR+, and otherwise to carry out our regulatory or maintenance functions. Payment information will be securely shared with our payment processor service providers for the purpose of processing payments.

### Electronic Filings transmitted using SEDAR+

If you are an Electronic Filer using SEDAR+, we also collect personal information included in Electronic Filings that you transmit using SEDAR+.

As an Electronic Filer you are responsible for all of the content of the Electronic Filings you make. This includes ensuring that you: (1) only transmit documents containing personal information that are necessary for the Electronic Filing; and (2) have provided notice to and obtained the consent of all individuals with respect to the collection, use and disclosure of personal Information contained in the Electronic Filings as are necessary for transmission of the Electronic Filings to the CSA and for the collection, use and disclosure by CSA Members of the Electronic Filings, including as part of carrying out a CSA Member's regulatory functions, and for disclosure by CSA Members in accordance with this Privacy Statement.

Under Canadian securities laws, personal information included in Electronic Filings is generally required to be made public except in certain limited circumstances. The objective for making public the Electronic Filings, which may contain personal information, is to enhance investor awareness of the business and affairs of publicly traded companies and to promote confidence in the transparent operation of capital markets in Canada. This objective is closely linked and relies heavily on the provision of accurate information, including personal information, on market participants.

The personal information collected within Electronic Filings is made publicly available in a few different ways:

1. Electronic Filings (or portions thereof) are made accessible to Public Users through the SEDAR+ Public Website. The Electronic Filings are categorized by type and are accessible using a variety of searching and sorting methods. The Electronic Filings (or portions thereof) that are made publicly available may be accessed and used by Public Users as described in the Terms of Use found at [sedarplus.com](http://sedarplus.com).
2. The ASC also offers data distribution services for the bulk distribution of Electronic Filings (or portions thereof) to subscribers on a subscription basis. Information disseminated through this service is provided under a license permitting resale of the information by the subscriber provided certain conditions are met, including ensuring use or disclosure of any personal information is in accordance with all applicable privacy laws.
3. From time to time the ASC may make Electronic Filings (or portions thereof) available to persons in response to an ad hoc request where such request is approved by the CSA. Information disseminated in response to an approved ad hoc

request is made subject to terms and conditions that govern the use of such information.

In each of these cases, the information is made available in furtherance of the objective of enhancing investor awareness of the business and affairs of capital markets participants and promoting confidence in the transparent operation of capital markets in Canada in accordance with applicable securities legislation.

CSA Members may also otherwise disclose this information in a manner consistent with a CSA Member's regulatory functions.

### ***Contacting the CSA Service Desk***

When you contact the CSA Service Desk (including through e-mail, submission of an online form, or web chat), the content of the communications you send to the CSA Service Desk (including your contact information), together with any responses from the CSA Service Desk, may be used and retained by the CSA in order to respond to or process your communication and to monitor service quality.

### **Privacy and Links to Other Sites**

SEDAR+ and the SEDAR+ Public Website contains links to other sites. We are not responsible for the content and the privacy practices of other web sites and encourage you to examine each site's privacy policy and disclaimers and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

### **Security**

SEDAR+ and the SEDAR+ Public Website use security measures designed to protect personal information in our custody or control against accidental loss as well as against unauthorized access, use or disclosure.

### **Modifications to this Privacy Statement**

The ASC may modify this Privacy Statement from time to time. Unless the ASC indicates otherwise, such modifications are effective when they are posted to the SEDAR+ Public Website and apply to all access to or continued use of SEDAR+ or the SEDAR+ Public Website (or any content therein). You agree to regularly review this Privacy Statement in order to be aware of any modifications. Your continued access or use of SEDAR+ or the SEDAR+ Public Website (or any content therein) after this Privacy Statement has been updated will indicate your acceptance of and agreement to the updated Privacy Statement. If you do not accept or agree to any modification to the Privacy Statement, do not continue to access or use SEDAR+ or the SEDAR+ Public Website (or any content therein).

### **Language of Privacy Statement**

*Applicable only if you are located in Québec* - It is the express wish of the parties that both the English and French versions of this Privacy Statement (French version available: <https://www.sedarplus.ca/onlinehelp//declaration-sur-la-protection-des-renseignements-personnels/?lang=fr>) and, if applicable, all related documents, be binding on the parties.

## Contacting Us

If you have any questions or concerns related to this Privacy Statement, you may contact the CSA Service Desk, attention SEDAR+ Administrator, by one of the methods set out below, and, where applicable, your enquiry will be directed to the privacy officer of the CSA Member to which your enquiry relates. The ASC does not guarantee the confidentiality of any communications made by you via e-mail or otherwise through the SEDAR+ Public Website.

By Mail to:

CSA Service Desk  
Attn: SEDAR+ Administrator  
12 Millennium Blvd, Suite 210,  
Moncton, NB E1C 0M3

By email at: [sedarplus@csa-acvm.ca](mailto:sedarplus@csa-acvm.ca)

Toll free at: 1-800-219-5381

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