



Brownstone Asset Management

BROWNSTONE ASSET MANAGEMENT – PRIVACY POLICY

OUR PRIVACY POLICY

Brownstone Asset Management is committed to protecting and respecting your privacy. This privacy policy outlines the ways that we ensure the protection of your privacy and the confidentiality of your personal information. This policy applies to Brownstones individual clients, including persons who carry on business alone or in partnership with other individuals.

WHAT IS PERSONAL INFORMATION?

Defined as information about an identifiable individual such as name, address, age, gender, income, marital status, finances, employment, identification numbers. Personal information does not include business contact information.

WHY WE NEED YOUR INFORMATION

Securities industry regulations require that we obtain a minimum amount of information about you so that we can provide the proper level of service and supervision to your account. We require certain information such as your financial position and risk parameters in order to base our recommendations about the proper management of your account. We require your SIN in order to comply with certain Canada Customs and Revenue Agency's reporting requirements. We may also use your SIN and Drivers License or Passport as a means of identifying you.

DISCLOSURE OF PERSONAL INFORMATION - THIRD PARTIES

In certain circumstances, disclosure of personal information to a third party may be necessary such as in the case when disclosure is lawfully permitted or required as well as in the case of dealings with our service providers. Our service providers are bound by the same regulations and are required to maintain procedures and high standards in respect to the protection of your personal information.

We are also obligated upon request to provide your information to regulatory bodies within the investment industry. We may also be required to disclose your information to government agencies or law enforcement agencies, or when we are in receipt of a valid Court Order or search warrant.

PROTECTION OF INFORMATION

We have thorough security standards in place to protect your information against unauthorized access and use. Only authorized individuals have access to this information and we educate our employees on the importance of confidentiality and customer privacy. Annually our employees sign a confidentiality agreement and declaration confirming their commitment and understanding of client privacy.

We retain your information only as long as we need it to service your account, or as long as industry regulations demand. When we no longer need your information, we will delete electronic records and destroy physical records.

YOUR RIGHT TO ACCESS INFORMATION

Most of your information is in the form of account documentation and transaction records. You will receive copies of any documents you sign to open your account with Brownstone. You will

also receive copies of monthly (or quarterly) statements of your account, which detail all of the transactions that have taken place in your account during that period. If you have chosen to have access to your account electronically (through TD Waterhouse), you may also view your account transactions that way. At any time, you can request access to your personal information (unless prohibited by law or regulation). If you require further details about your information, you may contact us at any time.

ACCURACY OF INFORMATION

Having accurate information about you will enable us to give you the best possible service. We expect that you will provide us with updated information when you move or change telephone numbers, or have any other material changes in your information. If you detect any errors in the documentation we provide to you, please let us know immediately.

YOUR ACCOUNT AT BROWNSTONE

By opening an account at Brownstone Asset Management, you are providing consent to Brownstone to collect, use and disclose your personal information as set out in the above information. You consent as well to be contacted by telephone, internet, email and other methods for the purpose of ongoing communication in the handling of your account(s) using the contact information you have provided.

ONLINE SERVICES

When you send us an email, we learn your exact email address as well as any other information you may have included in the email. While we may use your email address to reply to you, we do not make your email address known to anyone outside our firm. Please keep in mind that information sent via email is generally unencrypted, so we would recommend that you do not send us confidential information via email.

YOUR RIGHT TO WITHDRAW CONSENT

By opening an account with us, you are providing your consent for us to collect, use and release your personal information. If at any time you wish to withdraw this consent, please advise us. However, please note that withdrawing consent may mean that we will be unable to provide certain services or maintain an account for you. We will explain these consequences of withdrawing consent, should you choose to do so.

ADDRESSING YOUR CONCERNS

We will address and respond to any of your concerns about the handling of your information. Concerns may be addressed to the attention of the Chief Compliance Officer/Privacy Officer, Brownstone Asset Management, #300, 229 – 11th Avenue S.E., Calgary, Alberta T2G 0Y1.

If you believe your privacy may have been compromised you may initiate a complaint and request a review. Please submit a written complaint to our office directly. Upon review should you be dissatisfied with our response to your complaint you can appeal to the Privacy Commissioner. (<http://pipo.alberta.ca>)

For questions regarding Brownstone Asset Management's privacy policy please contact Bob Thompson at 403-262-6067.

****These procedures have been set up to comply with the Personal Information Protection Act (January 1,2004)****