

J.P. Morgan – Canada Wholesale Privacy Policy

We take steps to maintain the accuracy and confidentiality of your personal information, and to protect your privacy. This Wholesale Privacy Policy, together with applicable legislation, governs our actions as they relate to the handling of personal information in connection with our wholesale business in Canada. In this Privacy Policy, "you", "your", "yourself" shall refer to a customer of J.P. Morgan's wholesale business who is an individual (if applicable) or to the individual (employee or officer) of a J.P. Morgan customer who is a legal person. "J.P. Morgan" and "we", "us", "our" and "ourselves" shall refer to JPMorgan Chase Bank, N.A. Toronto Branch, J.P. Morgan Chase Bank Canada or J.P. Morgan Securities Canada Inc., as applicable ("J.P. Morgan"). This Privacy Policy does not apply to information that is not personal information under applicable legislation.

By submitting personal information to J.P. Morgan, you: (i) agree that we may collect, use and disclose personal information in accordance with this Privacy Policy, otherwise with your consent or as permitted or required by law; and (ii) acknowledge and consent that we may retain service providers (including affiliates acting in this capacity) to perform certain services on our behalf and that in the event that a service provider is located outside Canada, personal information may be processed and stored outside Canada and that governments, courts, national security, law enforcement or regulatory agencies in those countries may be able to obtain disclosure of personal information under the laws of those countries.

You may direct any questions or enquiries with respect to this Privacy Policy or about J.P. Morgan's privacy practices by contacting:

Privacy & Compliance Officer
J.P. Morgan Canada Wholesale
Suite 4500, TD Bank Tower
66 Wellington Street West
Toronto, Ontario M5K 1E7
E-mail: privacycanadawholesale@JPMorgan.com

Any questions, concerns or complaints regarding J.P. Morgan's privacy policy and practices, should first be directed to the above address where it will be reviewed. If the concern or complaint is justified, J.P. Morgan will correct the situation and, if applicable, will revise its policies and procedures related to that matter. If you would like to request access to, or correction of, your personal information, please write to us at the address above. Your right to access or correct your personal information is subject to applicable legal restrictions and we may take reasonable steps to verify your identity before granting access or making corrections.

Personal Information – Definition

Personal Information means information about an identifiable individual, as more particularly defined in applicable privacy legislation. Personal information does not include aggregate information that cannot be

associated with a specific individual, and in certain jurisdictions, it may also exclude business contact information.

Affiliates and Third Party Contractors

J.P. Morgan may transfer personal information it has collected in accordance with this Privacy Policy with certain affiliates who provide services to J.P. Morgan in connection with the purposes set out in this Privacy Policy provided that the personal information is required for such purposes. Many of these affiliates are located outside Canada. J.P. Morgan may also provide personal information to outside organizations as necessary to provide requested services. Our contracts with such third parties and affiliates require that (i) any information that we provide to them is held strictly confidential; and (ii) any information provided to them may be used solely for the purposes of providing the services that they have been contracted with to provide. J.P. Morgan may transfer personal information to outside agents, mandataries or service providers that perform services on our behalf in which case we use similar contractual or other means to ensure that your personal information is protected and not used or disclosed for any purposes other than as directed by J.P. Morgan. Many of these outside organizations and agents, mandataries and service providers are located outside Canada.

Purposes

In addition to the terms of this Privacy Policy, contractual terms may apply to the collection, use and disclosure of your personal information. Your execution of any agreement containing such contractual terms constitutes your written consent to such collection, use and disclosure in accordance with its terms.

More generally, J.P. Morgan may collect, use and disclose personal information as follows:

- to administer and service our business relationship with you and to provide you with requested products and services;
- to enforce your obligations under your agreements with J.P. Morgan;
- to perform a credit investigation which allows J.P. Morgan to determine your financial status by collecting financial information from credit reporting agencies or credit bureaus;
- to offer you additional products and services that may be of interest to you;
- to investigate suspicious activities in relation to the customer account;
- in the event of the actual or potential sale, assignment, financing, insuring, securitization or other disposal of all or part of our business or assets, or in the event of a contemplated or actual fundamental restructuring of our business such as a reorganization, merger, acquisition or amalgamation, which may include disclosure to parties connected with such transaction in order to determine whether to proceed with such transaction, to fulfill reporting or inspection requirements, or for the use and disclosure of personal information by our successors or assigns for substantially the same purposes as described in this Privacy Policy;
- when required or permitted by law; and
- otherwise with your consent.

Consent

J.P. Morgan typically seeks consent to the collection, use and disclosure of personal information at the time that the information is obtained. We may obtain personal information when an application is completed or an agreement signed in order to receive products or services from J.P. Morgan. Other information may be obtained when you change the nature of products or services you receive or otherwise when you have the need to contact J.P. Morgan. Personal information may be obtained from you in person, over the phone or through e-mail, regular mail or facsimile correspondence. In some cases we may collect personal information from a third party, in which case we require the third party to represent that they have consent to provide the personal information to us for the purposes described in this Privacy Policy or otherwise at the time of collection. You may withdraw your consent at any time (subject to legal or contractual restrictions and reasonable notice) by notifying J.P. Morgan. However, if you withdraw your consent to certain collections, uses or disclosures of your personal information, J.P. Morgan may be unable to provide services.

Type of Information Collected

The type of information collected may include the following:

- Name
- Address and contact information
- Date of Birth
- Ownership information concerning a legal entity
- Social insurance numbers and wire transfer instructions
- Account information including balances and transaction history

J.P. Morgan will use reasonable efforts to ensure that the personal information that it holds is as accurate, complete and current as necessary to fulfill the purposes for which it will be used.

Retention of Information

J.P. Morgan retains your personal information as long as necessary for the fulfillment of the purposes for which it was collected, subject to reasonable legal limitation periods, statutory or regulatory retention requirements and legitimate business requirements. J.P. Morgan will use reasonable efforts to ensure that personal information which is no longer required by J.P. Morgan will be disposed of or destroyed in a secure manner.

Security Measures

J.P. Morgan may store your personal information in an electronic file or a physical file. J.P. Morgan has implemented reasonable technological, organizational and physical security measures to protect your personal information from unauthorized access, improper use, and accidental destruction or loss. The physical file containing your personal information will be stored at J.P. Morgan's premises, or if required, at an offsite storage facility. The electronic file containing your personal information will be stored on a secure network. Authorized employees, mandataries and agents of J.P. Morgan who have a legitimate

purpose for accessing the information and require it in the course of their duties will have access to your personal information. There is restricted access to J.P. Morgan's offices and to the computer server rooms.

J.P. Morgan employees, as a condition of their employment, are required to comply with confidentiality, customer privacy and security obligations. J.P. Morgan employees are also trained on the importance of privacy and maintaining the confidentiality of personal information.

From time to time, J.P. Morgan reviews and updates its security measures in an effort to protect information in the most effective manner possible.

Amending this Privacy Policy

J.P. Morgan reserves the right to amend this J.P. Morgan Canada Wholesale Privacy Policy, along with any related provisions from time to time. If we materially change our privacy policies, we will take reasonable measures to notify you of these changes. If you are concerned about how your personal information is used or disclosed, you should check back at our website periodically or contact us as described above to obtain a current copy of our Privacy Policy. This Privacy Policy was last updated in November 2016.