

Hesperian Capital Management Ltd. Privacy Policy

Our Commitment to Your Privacy

At Hesperian Capital Management Ltd.(HCM), we recognize how important personal privacy is to you and to all of our clients. To provide the highest possible level of protection to you, we maintain standards designed to protect your privacy and prevent any misuse of your personal information. We have adopted the following principles and procedures which outline how we acquire, protect and use personal information, and how we will hold ourselves accountable to you.

What is Personal Information?

"Personal information" is any information that identifies you as an individual and includes information with respect to your name, address, age, gender, income, marital status, finances, employment, trading history and website use information, together with your personal references and identification numbers (such as a social insurance number). This may also include any communications you have had with us with concerning your account/investments.

Why is Personal Information Collected?

We use personal information to protect and administer your accounts and records; to comply with certain laws, regulations and regulatory policies. The information we ask for depends on the products or services you request and in most cases is required by law or Canadian securities regulatory bodies. For example, your social insurance number is required for products that earn investment income, in order to comply with the Canada Customs and Revenue Agency's income reporting requirements.

Disclosure of Personal Information

In general, Hesperian Capital Management Ltd. will not sell, trade or lend your personal information to any third parties unless we have your express permission to do so. However, there are times when disclosure of your personal information is necessary.

In certain circumstances, disclosing information to a third party may be required to help complete a transaction initiated by you or the disclosure is otherwise lawfully permitted or required. Sometimes it is necessary to provide personal information about you to a party outside our affiliated companies, such as to a vendor or service company that we hire to do our data processing or prepare your account statements or to provide support or services for one or more of our products. We select the company carefully and confirm that it uses standards comparable to ours.

The disclosure of personal information would also occur only when permitted by law, such as in response to a subpoena or other legal process or the use of your social insurance number to submit tax reports to Canada Customs and Revenue Agency.

Protection and Access of Personal Information

There are several ways we strive to protect your personal information:

We have procedures that limit employee access to non-public personal information to those employees with a business need to know such information about you. We educate our employees about the importance of confidentiality and customer privacy through standard operating procedures and training programs. Each employee must certify annually that he or she has maintained the confidentiality of information entrusted to him or her.

Our suppliers and agents, as part of their own privacy policies or agreements, and Hesperian Capital Management Ltd., are bound to maintain your confidentiality and may not use the information for any unauthorized purpose. When we provide information in response to a legal or regulatory inquiry or order, we ensure that the order is valid and we disclose only the information that is required - otherwise we will seek your consent prior to disclosing any information.

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. This period may extend beyond the end of your relationship with us but only for so long as it is necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your personal information is no longer needed for the purposes explained to you, we have procedures to destroy, delete, erase or convert it to an anonymous form.

Upon request and unless prohibited by law, regulation or self-regulation, you will be given access to your personal information, be informed of its existence, use, disclosure and we will also make available to you the policies and practices that apply to the management of your personal information. You may also verify its accuracy and completeness and may request to amend it, if appropriate.

Keeping Your Personal Information Accurate

HCM attempts to keep its records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information. If you find any errors in our information about you, let us know and we will make the corrections immediately and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

Client Enquiries

You may direct any questions or enquiries with respect to the Hesperian Capital Management Privacy Policy by contacting **Deirdre Harris** at 403-531-1406 or toll-free at 877-531-9355.