

Privacy Policy

This Privacy Policy explains how HughesLittle collects, uses and discloses the personal information you may provide while using our services or our website at www.hugheslittle.com. By using our services or our website, you are indicating your consent to the collection, use, and disclosure of your personal information in accordance with this Policy.

1. Personal Information You Specifically Provide

In the course of completing the New Account Application Forms and related documents, and during your use of our services or website, you may be asked to voluntarily provide personal information, such as your name and address including your email address, your social insurance number, and information about your financial circumstances, investment knowledge, objectives and strategies. In the course of providing our services or using our website, HughesLittle also collects personal information related to your accounts and investment activities. HughesLittle uses your personal information for the following purposes and as otherwise permitted by law: (a) to contact and correspond with you; (b) to provide our services; and (c) to perform security and related investigations.

HughesLittle does not sell or disclose your personal information to any third parties for the purpose of selling, marketing or soliciting any products or services. HughesLittle may disclose your personal information only in the following circumstances and as otherwise permitted by law:

(a) *Disclosure to Securities Regulators* - HughesLittle is registered with the British Columbia Securities Commission, the Alberta Securities Commission, Ontario Securities Commission and the Quebec Securities Commission (collectively "the Commissions"). For regulatory purposes, the Commissions require access to personal information of current and former clients, directors, officers, employees, agents, partners and others that have been collected by HughesLittle. The Commissions collect, use or disclose such personal information for regulatory purposes, including surveillance of trading activity; sales, financial compliance, trade desk review and other regulatory audits; investigation of potential regulatory and statutory violations; regulatory databases; enforcement or disciplinary proceedings; reporting to securities regulators; and information-sharing with securities regulatory authorities, regulated marketplaces, other Commission and law enforcement agencies in any jurisdiction in connection with any of the foregoing.

(b) *Disclosure to Services Providers* - HughesLittle may provide your personal information to our service-providers, for the purposes only of providing our services. HughesLittle requires our service-providers to agree to use your personal information only for the purposes for which it is provided to them, and to protect the privacy of your personal information in a manner consistent with applicable law.

(c) *Law Enforcement and Legal Disclosure* - HughesLittle may also disclose your personal information to a government institution or agency that has asserted its lawful authority to obtain the information; to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information; or to comply with court rules regarding the production of records and information; or to our legal counsel.

2. Safeguarding Your Personal Information

Your personal information may be stored or accessed in Vancouver, British Columbia or

Toronto, Ontario (where the back up servers for our data back service providers are located). HughesLittle employs reasonable security safeguards appropriate to the sensitivity of the personal information in our possession or under our control in order to protect that information from unauthorized access, collection, use, disclosure, modification or similar risks.

3. Accessing Your Personal Information

You may request access to your personal information and information about HughesLittle's collection, use and disclosure of that information by sending your request to our Privacy Officer at one of the addresses noted below. Subject to certain exceptions and limitations prescribed by law, you will be given reasonable access to your personal information and will be entitled to challenge the accuracy and completeness of the information and to have it amended as appropriate. You can help HughesLittle maintain the accuracy of your information by notifying us of any changes.

4. Non-Personal Information Automatically Collected from Website Users

Our website automatically collects certain non-personal information regarding users, such as the date and time they access the website, the Internet Protocol address and geographic location of the computer they use to access the website, the website pages accessed, and the content accessed or downloaded. This non-personal information is used for system administration purposes and to improve the website.

Our website also may use "cookies", a technology that installs a small amount of information on a website user's computer to permit the website to recognize future visits using that computer. Cookies enhance the convenience of our website. For example, the information provided through cookies is used to recognize you as a previous user of the website, offer personalized content and information for your use, and otherwise facilitate your experience using the website. You may choose to decline cookies if your browser permits; doing so may affect your ability to access or use certain features of our website.

5. Emails and Other Communications from HughesLittle

You may elect to receive email or other communications containing information about HughesLittle and related matters HughesLittle believes will interest you. At any time after electing to receive such emails or other communications, you may ask HughesLittle to stop sending them to you by sending your request to our Privacy Officer at the addresses noted below. Also, each email HughesLittle sends to you will tell you how to decline further unsolicited communications.

6. Further Information

If you would like to discuss our privacy practices further with us please contact HughesLittle's Privacy Officer by any of the following methods:

- (a) by telephone - 1-877-696-9799;
- (b) by email - admin@hugheslittle.com; or
- (c) by postal mail to -
"Privacy Officer",
Box 19 710-688 West Hastings Street Vancouver, BC, V6B 1P1