Schedule C - Privacy Policy

Bold Wealth Partners Inc.

Last updated: October 2026

1. Collection and Use of Personal Information

We collect, maintain and use the personal information of our clients. We recognize how important privacy is for our clients. Set forth below are our policies that apply with respect to the personal information we collect from clients.

2. What is Personal Information?

Personal information is information about an identifiable individual. Depending on the services you request and applicable legal and regulatory requirements, we may collect your name and contact information; date of birth, citizenship, residency, occupation and marital status; social insurance number, tax identification information and government-issued identification; banking, financial and tax information; income, net worth, source of wealth and source of funds; investment knowledge, experience, objectives, time horizon, risk profile and liquidity needs; account holdings, transactions, performance, instructions and related records; information concerning beneficial ownership, control, authorized persons, legal representatives and trusted contact persons; information required for identity verification, anti-money laundering, sanctions and politically exposed person screening; complaints and inquiries; and communications with us, including recordings and transcripts where applicable. We may also collect technical information described in the Cookies and Similar Technologies section below.

3. Why do we Collect Personal Information?

We collect your personal information for the following reasons:

- to verify your identity, establish your account and protect against fraud, financial exploitation, money laundering and other unlawful activity
- to understand and periodically update your financial circumstances, investment needs, objectives, time horizon, risk profile and other know-your-client information and to assess the suitability of investment decisions
- to open, administer and service your account, manage your portfolio, execute and settle transactions, maintain records and provide statements, reports and other communications
- to provide and manage other services you request, respond to inquiries and complaints, verify instructions, resolve disputes and establish or defend legal claims
- to manage our business operations, including information technology, cybersecurity, audit, risk management, business continuity, quality assurance and the oversight of service providers; and
- to comply with securities, tax, anti-money laundering, sanctions, recordkeeping and other legal and regulatory requirements, and to cooperate with regulators, law enforcement and other authorities where required or permitted by law.

4. How do we Collect Personal Information?

Personal information is collected from the following sources, and is for the most part collected directly from you:

- correspondence and interactions with you, including phone calls, video conferences, meetings and emails
- forms and documents submitted to us, including investment management agreements and account-opening, know-your-client and tax documentation
- transactions and dealings with us, custodians, brokers, financial institutions and our affiliates
- your representatives, advisers, trusted contact person and other persons you authorize to provide information; and
- public records, identity-verification services, regulatory or sanctions lists and other sources permitted by law.

5. Use of Personal Information:

By providing us with your personal information and entering into an investment management agreement with us, you consent to our collection, use and disclosure of your personal information for the purposes described in this Privacy Policy and the investment management agreement. We will obtain additional consent where required by applicable law, including before using or disclosing personal information for a new purpose, unless otherwise permitted or required by law.

We do not sell your personal information. We may disclose personal information where necessary for the purposes described in this Privacy Policy, with your consent, or as otherwise required or permitted by law, including to:

- custodians, brokers, dealers, banks and other financial institutions involved in opening, administering, trading in or reporting on your account
- your financial planner, accountant, lawyer or other adviser where you direct or authorize us to do so
- service providers that support our operations, including providers of information technology, cloud hosting, cybersecurity, data processing, recordkeeping, account-statement preparation, identity verification, anti-money laundering and sanctions screening, transcription, audit, insurance, legal, accounting and tax services
- our affiliates, if any from time to time, where necessary to provide services, administer our business or comply with legal and regulatory requirements
- a prospective purchaser, successor or other party to a proposed or completed business transaction, subject to applicable legal requirements and appropriate confidentiality protections; and
- securities regulators, self-regulatory organizations, tax authorities, law enforcement, courts and other governmental or regulatory authorities where required or permitted by law.

We may be required to disclose personal information without your consent to comply with legal reporting obligations. For example, we may be required under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* to report suspicious transactions to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and certain accounts may be reported to the Canada Revenue Agency under Canadian legislation implementing the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS).

We require service providers that process personal information on our behalf to use it only for authorized purposes and to maintain safeguards appropriate to its sensitivity. We remain responsible for personal information under our control, including information transferred to a service provider for processing.

6. How We Handle and Protect Personal Information

We protect your personal information with safeguards and security measures appropriate to its sensitivity. We restrict access to personal information about clients to employees and other persons who need the information to provide services or perform authorized functions. Our employees, agents and service providers are required to maintain confidentiality and may not use personal information for unauthorized purposes. We monitor and review our procedures and safeguards regularly. When we provide personal information in response to a legal or regulatory inquiry or order, we take reasonable steps to confirm the authority for the request and disclose only the information that is required or permitted by law; otherwise, we will seek your consent prior to disclosing the information.

Personal information may be stored or processed on our systems or by service providers in Canada or other jurisdictions. When information is transferred to a service provider, including one outside Canada, it remains subject to the laws of the jurisdiction in which it is processed and may be accessible to courts, law enforcement, national security authorities or other governmental authorities in that jurisdiction. We use contractual and other measures designed to require service providers to protect personal information and process it only for authorized purposes. Where required by applicable law, we assess relevant privacy and security factors and implement measures intended to provide appropriate protection. You may contact our Privacy Officer for further information about our use of service providers outside Canada.

You may request access to your personal information to verify its accuracy, update your information, or withdraw your consent to a collection, use or disclosure, subject to legal or contractual restrictions and reasonable notice, by contacting us. We will inform you of the implications of withdrawing consent. Your ability to receive services from us

may be impacted if you withdraw consent to the collection, use or disclosure that is necessary for us to provide those services or meet our legal or regulatory obligations.

We only collect personal information that is necessary for us to provide the services you have requested and meet our related legal obligations. We make reasonable efforts to keep client information accurate and up to date. You can help us maintain the accuracy of your information by notifying us of changes. If you find an error in our information about you, let us know and we will make appropriate corrections. For information that remains in dispute, we will note your opinion in the file.

We retain client information only for as long as required for the purposes for which it was collected and to meet legal, regulatory and legitimate business requirements. This period may extend beyond the end of your relationship with us, including to meet securities, tax, anti-money laundering, limitation-period and recordkeeping requirements and to address complaints or legal claims. When personal information is no longer required, we use procedures to securely destroy, delete, erase or anonymize it, as permitted by applicable law.

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 and disclosure.

7. Trusted Contact Person Information

If you provide us with the name and contact information of a trusted contact person and your written consent to contact that person, we will use and disclose that information only for the purposes permitted by applicable securities laws, including to confirm or make inquiries about concerns regarding possible financial exploitation, concerns about your mental capacity to make financial decisions, the name and contact information of your legal representative, if any, or your current contact information. We will safeguard and retain trusted contact person information in accordance with this Privacy Policy and our legal and regulatory obligations.

8. Recording and Transcription

We may record or transcribe telephone calls, video conferences and other meetings for purposes such as preparing and verifying meeting notes, maintaining accurate client records, providing services, training and quality assurance, resolving disputes, and complying with legal and regulatory obligations. Before recording or transcribing a communication, we will notify the participants of the practice and its purposes and obtain consent where required by applicable law. We may use artificial intelligence or other automated tools, including tools provided by third-party service providers, to generate transcripts, summaries or meeting notes. Recordings, transcripts and related outputs may contain personal information and will be collected, used, disclosed, safeguarded, retained and destroyed in accordance with this Privacy Policy and applicable Canadian privacy laws. They may be processed or stored by service providers in Canada or other jurisdictions and may therefore be subject to the laws of those jurisdictions. Please notify us if you do not wish a communication to be recorded or transcribed so that, where reasonably practicable and subject to our legal and regulatory obligations, alternative arrangements may be considered.

9. Cookies and Similar Technologies

When you visit our website or use our online services, we and our service providers may use cookies and similar technologies to operate and secure the website, remember preferences, understand website usage and improve functionality. These technologies may collect information such as your Internet Protocol address, browser and device type, operating system, pages visited, time spent on pages and referring website. You can adjust your browser settings to block or delete cookies, although doing so may affect the operation of some website features. Where required by applicable law, we will obtain consent for non-essential cookies and provide available choices regarding their use.

10. Province-Specific Privacy Protections

This Privacy Policy is intended to apply across Canada. Depending on where you reside and where the relevant collection, use or disclosure occurs, your personal information may be protected by the federal *Personal Information Protection and Electronic Documents Act* or by applicable provincial private-sector privacy legislation, including the *Personal Information Protection Act* in Alberta, the *Personal Information Protection Act* in British Columbia, or Québec's

Act respecting the protection of personal information in the private sector. PIPEDA may continue to apply to personal information transferred across provincial or national borders in the course of commercial activities. Where provincial law provides additional rights or imposes additional requirements, we will handle personal information in accordance with those requirements. If Québec law applies, this may include additional transparency and consent requirements, privacy impact assessments in prescribed circumstances, protections for communications outside Québec, and statutory rights concerning access, correction, withdrawal of consent, data portability and certain automated decisions, subject to applicable conditions and exceptions. You may contact our Privacy Officer for information about the law applicable to your personal information and how to exercise your rights.

11. Questions, Concerns and Complaints

If you have any questions, concerns or complaints about your privacy and the confidentiality of your personal information, or if you would like access to your personal information that we have on file, you may contact our Privacy Officer, at privacy@boldwealth.ca or (888) 815-2653. You can also contact the Office of the Privacy Commissioner of Canada with privacy-related questions at (819) 994-5444. We may periodically update our privacy policy and when we do so we will post the updated version on our website and, where there are significant changes made to it, circulate it to our then current clients.

BoldWealth

Schedule D - What to Do If You Have a Complaint

Our complaint process

Filing a complaint with us
If you have a complaint about our services or a product, contact us at

Chief Compliance Officer (CCO): compliance@boldwealth.ca
Address: 21 Atlantic Avenue, Unit C, Toronto, ON, M6K 3E7

You can file a complaint with us by whichever means is convenient for you. If you are a resident of Quebec, you may also complete the form from the Autorité des marchés financiers (AMF). You may want to consider using a method other than email for sensitive information.

Tell us:
- what went wrong
- when it happened
- what you expect, for example, money back, an apology, account correction

We will acknowledge your complaint
We will acknowledge your complaint in writing, as soon as possible, typically within 5 business days of receiving your complaint (or within 10 days for residents of Quebec).

We make sure we understand your complaint and what you expect from us. We may ask you to provide clarification or more information to help us resolve your complaint.

Help us resolve your complaint sooner
- Make your complaint as soon as possible.
- Reply promptly if we ask you for more information.
- Keep copies of all relevant documents, such as letters, emails and notes of conversations with us.

We will provide our decision
We normally provide our decision in writing, within 90 days of receiving a complaint (or 60 days for residents of Quebec). It will include:

- a summary of the complaint
- the results of our investigation
- our decision to make an offer to resolve the complaint or deny it, and an explanation of our decision

If our decision is delayed
If we cannot provide you with our decision within 90 days (or 60 days for residents of Quebec), we will:

- inform you of the delay
- explain why our decision is delayed, and
- give you a new date for our decision (however, for residents of Quebec the additional time may not exceed 30 days.)

Assessment of the offer and resolution of the complaint
If we present an offer, we give you time to assess and respond to it. We will give you enough time to seek the advice you need to make an informed decision. You can decide to accept or refuse the offer, or you can present a counter offer.

Once we reach an agreement with you to resolve your complaint, if you are a resident of Quebec, we will implement the terms of the offer within 30 days unless we agree upon a different time period with you and it is in your interest to do so.

Simplified process in Quebec for certain complaints
If you are a resident of Quebec, we may follow a simplified process for certain complaints.

- This process is for complaints that we can resolve to your satisfaction within 20 days.
- These complaints may be referred to a member of our client service team and handled verbally (e.g., in a phone call).

We consider a complaint resolved to your satisfaction when

- you accept our proposed solution to your complaint, or
- the explanations we provide to you are sufficient to resolve your complaint.

When a complaint isn't resolved using the simplified process
If we cannot resolve your complaint to your satisfaction under this process, we will notify you in writing.

Your complaint will continue to be processed, but in accordance with the steps in the complaint process described earlier.

The time that we take trying to resolve your complaint under the simplified process does not impact our obligation to provide you with our written final response within the required time period.

Complaint record
For each complaint, we create a record in which we keep all the information or documents required for the processing of your complaint.

If you are a resident of Quebec, you can contact us to request to have your complaint record examined by the AMF at any time if you are not satisfied with the response we provided or how your complaint was processed. We will send your complaint record to the AMF no later than 15 days following receipt of your request.

If you are not satisfied with our decision
You may be eligible for the independent dispute resolution service offered by the AMF (if you are a resident of Quebec) or by the Ombudsman for Banking Services and Investments (OBSI) (if you are a resident of another Canadian jurisdiction). These services are free of charge to you.

A word about legal advice
You always have the right to go to a lawyer or seek other ways of resolving your dispute at any time. A lawyer can advise you of your options. There are time limits for taking legal action. Delays could limit your options and legal rights later on.

Taking your complaint to the AMF (Quebec)
If you are a resident of Quebec, you can request that our complaint record be examined by the AMF. The AMF will examine the complaint record and may, with the parties' consent, act as conciliator or mediator regarding the complaint or designate a person to act as such. Applicable Quebec securities laws provides that conciliation or mediation may not, alone or in combination, continue for more than 60 days after the date of the first conciliation or mediation session unless the parties consent.

Taking your complaint to OBSI
You may be eligible for OBSI's free and independent dispute resolution service if:

- we do not provide our decision within 90 days after you made your complaint, or
- you are not satisfied with our decision

OBSI can recommend compensation of up to $350,000. OBSI's service is available to clients of our firm. This does not restrict your ability to take a complaint to a dispute resolution service of your choosing at your own expense, or to bring an action in court. Keep in mind there are time limits for taking legal action.

Who can use OBSI
You have the right to use OBSI's service if:

- your complaint relates to a trading or advising activity of our firm or by one of our representatives
- you brought your complaint to us within 6 years from the time that you first knew, or ought to have known, about the event that caused the complaint, and
- you file your complaint with OBSI according to its time limits below

Time limits apply

- If we do not provide you with our decision within 90 days, you can take your complaint to OBSI any time after the 90-day period has ended.
- If you are not satisfied with our decision, you have up to 180 days after we provide you with our decision to take your complaint to OBSI.

Filing a complaint with OBSI

Contact OBSI
Email: ombudsman@obsi.ca
Telephone: 1-888-451-4519 or 416-287-2877 in Toronto

OBSI will investigate
OBSI works confidentially and in an informal manner. It is not like going to court, and you do not need a lawyer.

During its investigation, OBSI may interview you and representatives of our firm. We are required to cooperate in OBSI's investigations.

OBSI will provide its recommendations
Once OBSI has completed its investigation, it will provide its recommendations to you and us. OBSI's recommendations are not currently binding on you or us.

OBSI can recommend compensation of up to $350,000. If your claim is higher, you will have to agree to that limit on any compensation you seek through OBSI. If you want to recover more than $350,000, you may want to consider another option, such as legal action, to resolve your complaint.

Information OBSI needs to help you
OBSI can help you best if you promptly provide all relevant information, including:

- your name and contact information
- our firm's name and contact information
- the names and contact information of any of our representatives who have been involved in your complaint
- details of your complaint
- all relevant documents, including any correspondence and notes of discussions with us