

## PRIVACY POLICY

Two Sevens Capital is committed to protecting your personal and financial information. We offer a comprehensive multi-layered approach to safeguarding your privacy and ensuring that your personal information is secure.

Throughout the policy, we will refer to information that personally identifies you or your accounts as personal information.

Two Sevens Capital's privacy policy describes how Two Sevens Capital collects and uses your personal information, and under what conditions this information may be shared with third parties. The policy applies to all current and former Two Sevens Capital clients or individuals who are subscribed to one of our opportunities.

### Privacy Policy Principles.

- 1) We do not sell your personal information to anyone.
- 2) Use collection and storage of your personal information;
  - a. When you request a Two Sevens Capital subscription, we will ask you to provide specific information that will enable us to satisfy your request. In most cases, this information will be provided by you, when you open a two sevens capital account or complete a form on our website.
  - b. We may also collect information about you from other sources, such as credit reporting agencies or other financial institutions.
  - c. We collect, use and may disclose your **Social Insurance Number (SIN)** to third parties for income tax reporting purposes as required by law. In addition, Two Sevens Capital is required to verify the identity of all client accounts and account beneficiaries. In order to fulfill this obligation Two Sevens Capital may request your SIN to verify your identity through an established credit reporting agency.
  - d. It is always your decision to provide Two Sevens Capital with your personal information. You should be aware that in certain instances, your refusal to provide Two Sevens Capital with the requested information may result in our inability to offer you the service or product you request or may result in delays and improving your accounts.
  - e. We may use other companies including affiliated companies to provide services on our behalf such as data processing, account administration and marketing such companies will be given only the personal information required to perform those services, and we do not authorize them to use or disclose that information for their own purposes, we require that these companies keep your information confidential and protected. In some cases, these other companies may be located outside of Canada, and may be required to disclose information to law enforcement, and national security authorities in that country.
  - f. **We do not:**
    - Collect use or disclose information that is otherwise unlawful
    - Profile or categorize clients in a way that leads to unfair unethical or discriminatory treatment, contrary to human rights law
    - Collect use or disclose information for purposes that are known are likely to cause significant harm to the individual
    - Published personal information with the intended purposes of charging individuals for its removal
    - Require passwords to social media accounts for the purpose of employee screening
    - Surveil through audio or video, the individuals on device we clearly disclose to all clients, and when calls are recorded

3) We collect personal information in the normal course of business to administer your accounts and serve you better.

### **Website use and cookies**

Cookies are small amounts of data that a website can send to your browser and store on your computer. They can identify if your browser has visited certain sites, pages, or ads on a specific date. Two Sevens Capital uses cookies to enhance the navigation and functionality of our websites and to personalize aspects of your experience.

You do have control over cookies. Most browsers can be set to notify you when a cookie is being placed on your computer or device, which gives you the choice of whether you'd like to accept it. You can set most browsers to refuse to cookies, although this may affect your Internet experience on our website. You can also delete cookies that are already on your computer

Our services use the following categories of cookies:

- Analytics and performance-related cookies: we use various web analytics tools that use cookies on your computer to monitor your browsing patterns and page interactions to help to personalize and improve your user experience.
- Customer-related cookies: we use cookies to serve ads to those who have previously visited our site(s), and to ensure that prospective clients receive incentive offers for which they may be eligible. Cookies are also used to personalize your customer experience; for example, to recognize that you are a client when you are on the login page.
- Advertising-related cookies: our third-party vendors, such as Google, also use this information to display Two Sevens Capital ads on external sites across the Internet. Two Sevens Capital, third-party vendors, and third-party ad servers may use first-party and third-party cookies to track the performance of advertisements, and to collect aggregate data on past visits to our websites and browsing behaviour.
- Note: Two Sevens Capital does not use third-party web analytics tools to collect personally identifiable information entered on our site(s). This information is only personally identifiable if you have chosen to reveal yourself; for example, by opening an account with us.

4) We protect the confidentiality and security of your personal information.

- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.
- We restrict access to personal information to authorized personnel for business purposes only.
- All employees are trained and required to safeguard such personal information.
- We maintain physical, electronic and procedural safeguards to protect your personal information.