Last revised: **May 27, 2025**

990 GROUP PRIVACY STATEMENT

990 Capital Management Corp. and its affiliates (collectively, "**990 Group**", "**we**", "**our**" or "**us**") recognize the importance of privacy. The purpose of this Privacy Statement is to inform you about our privacy practices, including how we collect, use, and disclose your personal information.

What This Privacy Statement Covers

This Privacy Statement covers the following topics:

1. Personal Information We Collect
2. How We Use Your Personal Information
3. How We Share Your Personal Information
4. Your Consent to the Collection, Use and Disclosure of Your Personal Information
5. Our Use of Cookies
6. Opting Out of Marketing Communications
7. Retention, Storage, and International Transfer of Personal Information
8. Information Security
9. Accessing and Updating Your Personal Information
10. Third-Party Websites and Services
11. Changes to this Privacy Statement
12. How to Contact Us

1. Personal Information We Collect

"Personal information" means information about an identifiable individual as described under Canadian privacy laws.

Personal information does not generally include any business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, work fax number or work e-mail address.

This Privacy Statement does not apply to the extent we process personal information in the role of a processor or service provider on behalf of our customers. It is that customer's privacy statement that applies; we conduct such activities strictly in accordance with our customer's instructions and pursuant to our contractual arrangements with the customer. If you are an end user or consumer with an existing relationship with one of our customers, you should refer to the customer's website to understand their privacy practices and policies.

We may collect, use, and disclose different types of personal information, depending on our relationship with you. Generally, we collect the following types of personal information (not all of which may apply to you):

- identity information, such as your name, username or similar identifier, marital status, title, date of birth and gender;
- contact information, such as your billing address, delivery address, e-mail address and telephone numbers;
- event participation information, such as your enrollment and attendance at our events; and
- marketing and communications information, such as your preferences for receiving our newsletter.

We may also create, use, and share anonymized data for any purpose. Anonymized data is generally not considered personal information because it cannot be used to identify you.

2. How We Use Your Personal Information

We generally use your personal information for the following purposes:

- to determine your eligibility for our services in accordance with applicable laws and our policies;
- to respond to your inquiries, complaints or requests;
- to communicate with you through our newsletter or other member communications;
- to manage our business and our arrangements with our customers, including to detect and prevent errors and fraud;
- to improve the effectiveness and efficiency of our operations, products, services, and programs;
- to investigate legal claims and protect our rights, operations or property;
- for such other purposes as you may consent to from time to time; and
- as otherwise required or permitted by law.

3. How We Share Your Personal Information

We generally identify to whom, and for what purposes, we will disclose your personal information (and we obtain your consent to such disclosure) at the time we collect your personal information.

We may disclose your information in and between members of the 990 Group, so that they can assist in providing you with our services.

We may disclose your information when we believe such disclosure is required or permitted by law. In addition, we may disclose your personal information to a third party in the event of any significant business transaction, such as a merger or reorganization.

We may rely on service providers to perform a variety of services on our behalf, such as payment card processors, technical support providers, and data storage and processing service providers.

4. Your Consent to the Collection, Use and Disclosure of Your Personal Information

We may collect, use, and disclose your personal information with your consent. How we obtain your consent, including whether it is express or implied, will depend on the circumstances and the sensitivity of the personal information in question. Generally, we will seek your consent at the time we collect your personal information, either orally, electronically, or in writing.

If you provide personal information about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect, use and disclose their information as described in this Privacy Statement.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, please contact us using the contact information in the "How to Contact Us" section below. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that we will no longer be able to provide you with certain products or services.

In certain circumstances, we may collect, use, and disclose your personal information without your consent to the extent permitted or required by law.

5. Our Use of Cookies

A "cookie" is a small text file that contains information and is stored on your computer. We generally use cookies and similar tracking technologies, such as web beacons and pixels, to automatically collect information about your use of our website and your interaction with our emails. Information we collect may include your IP address (or proxy server), device and application identification numbers, location, browser type, internet service provider and/or mobile carrier, pages and files viewed, searches, operating system and system configuration information, and date/time stamps associated with your usage.

We may use this information to facilitate the use of our website, for our business or analytical purposes (including to assess website traffic and track search criteria), and to personalize web pages according to your choices and interests.

We do not use your personal information to engage in interest-based or behavioral advertising of our services across third-party websites or service offerings.

If you do not wish to accept cookies, you can adjust your web browser settings so that you automatically deny the storage of cookies or are informed each time a website requests to store a cookie. Previously stored cookies can also be deleted through your web browser. Please refer to your web browser's help pages for more information. Some areas or features of our website rely on cookies and may not work if you delete or decline cookies. For more information about cookies generally, please visit www.allaboutcookies.org.

6. Opting Out of Marketing Communications

If you no longer want to receive marketing-related e-mails from us, you may opt out by clicking the "unsubscribe" link at the bottom of any e-mail you receive from us. You may also opt out by contacting us directly using the contact information in the "How to Contact Us" section below.

If you opt out from receiving marketing-related e-mails, we may still need to send you communications about your use of our products or services, or other matters.

7. Retention, Storage, and International Transfer of Personal Information

We generally will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and for a longer period when permitted or required by law.

We may transfer your personal information outside of Canada to fulfil the purpose for which we collected it, including for processing and storage by service providers. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located, which may have different data protection laws than Canada. Those laws may require disclosure of your personal information to authorities in that country. For more information about our policies and practices regarding service providers outside of Canada, contact us using the contact information in the "How to Contact Us" section below.

8. Information Security

We have implemented physical, organizational, contractual, and technological security measures in an effort to protect your personal information from loss or theft, unauthorized access, use, or disclosure.

Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in risks such as phishing and identity theft. We will address such breaches as required by law.

We may also require that you assist us in safeguarding your personal information. For example, if you create an account through our website or applications, you should use a unique and strong password and not share your password with others.

If you have reason to believe that your personal information is no longer secure, please contact us immediately using the contact information in the "How to Contact Us" section below.

9. Accessing and Updating Your Personal Information

We expect you to supply us with updates to your personal information, when required. We will not routinely update your personal information unless such a process is necessary.

You may make a request to review any personal information about you that we have collected, used, or disclosed, and information about those uses and disclosures, and we will provide you with any such personal information to the extent required by applicable laws.

You may also challenge the accuracy or completeness of your personal information in our records. If you demonstrate that your personal information in our records is inaccurate, incomplete or equivocal, we will amend or delete your personal information as required. We may transmit the amended information to third parties to whom we have disclosed your personal information.

We may require that you provide sufficient identification to fulfill your request to access or correct your personal information. We will not charge you any fees to access your personal information in our records without first providing you with an estimate of the approximate fees, if any.

If we are processing your personal information on behalf of our customer, we may refer your access or correction request to that customer.

10. Third-Party Websites and Services

We may provide links to third-party websites for your convenience and information. We may also make opportunities available to you to purchase, subscribe to, or use other products or services from third parties with different privacy practices. Those other websites, products, or services are governed by the privacy statements and policies of the respective third party. This Privacy Statement does not extend to any websites, products, or services provided by third parties. We do not assume responsibility for the privacy practices of third parties and we encourage you to review all third-party privacy statements prior to using third-party websites, products, or services.

11. Changes to this Privacy Statement

The Privacy Statement was last revised as of the date that appears at the top of this page.

From time to time, we may make changes to this Privacy Statement. When changes are made, they will become immediately effective when published in a revised Privacy Statement posted on our website, unless otherwise noted. We may also communicate the changes to this Privacy Statement by other means.

12. How to Contact Us

All comments, questions, concerns, or requests regarding your personal information or our privacy practices should be forwarded to our Privacy Officer as follows:

privacy@990capital.com

990 Capital Management Corp.
18 King Street East, Suite 1501
Toronto, ON, M5C 1C4
Attention: Privacy Officer