PRIVACY

The Privacy Policy explains how the Firm collects, uses, and discloses the personal information Clients 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.

Personal Information You Specifically Provide

When completing the Account Application Forms and related documents, and during your use of our services 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, risk tolerance and risk capacity. While providing our services the Firm also collects personal information related to your accounts and investment activities. The Firm 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.

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

(a) *Disclosure to Securities Regulators* – The Firm 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 the Firm. 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* – The Firm may provide your personal information to our service-providers, for the purposes only of providing our services. The Firm 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) *Government, Law Enforcement and Legal Disclosure* – The Firm 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.

Safeguarding Your Personal Information

Your personal information may be stored or accessed in Vancouver, British Columbia or Toronto, Ontario (where the back-up servers of our data back-up service providers are located). The Firm employs

reasonable security safeguards appropriate to the sensitivity of the personal information in our possession or under our control to protect that information from unauthorized access, collection, use, disclosure, modification, or similar risks.

Accessing Your Personal Information

You may request access to your personal information and information about the Firm's collection, use and disclosure of that information by sending your request to our Privacy Officer by one of the methods 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 the Firm maintain the accuracy of your information by notifying us of any changes.

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.

Emails and Other Communications from the Firm

You may receive email or other communications containing information about the Firm and related matters the Firm believes will interest you. At any time after electing to receive such emails or other communications, you may ask the Firm to stop sending them to you by sending your request to our Privacy Officer by the method noted below.

Further Information

If you would like to discuss our privacy practices, please contact the Firm's Privacy Officer (Mark Hughes) at:

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