

## Your Privacy is Our Priority

#### We Take Our Commitment to Your Privacy Seriously

We all want to feel safe about the information we give to financial institutions. That's why Atuqtuarvik Corporation is committed to safeguarding information provided to us by clients.

Please take a few minutes to read about how we protect the confidentiality of non-public personal information.

## Who We Are and How Our Privacy Policy Services to Protect You

Atuqtuarvik Corporation was created to improve the access of eligible businesses to various sources of commercial finance for the purpose of business start-ups, business expansion and business acquisition. The Corporation opened for business in the fall of 2000. To date, Atuqtuarvik Corporation has actively participated in the developing Nunavut economy by financially supporting Inuit business initiatives in a variety of market sectors in the form of loans and equity facilities to qualifying Inuit businesses throughout Nunavut.

Atuqtuarvik Corporation (together referred to as "we", "our", "us" throughout this notice) do not sell or share non-public personal information of individuals outside of Atuqtuarvik Corporation, except as is permitted by law. Our privacy policy describes the steps we take to protect each individual's information and explains when non-public personal information about current or former customers may be shared with other parties.

## What Type of Information Do We Collect?

When you, as an individual, provides Atuqtuarvik Corporation with your non-public personal information, we collect and use this information to evaluate the merit of your application to respond to your request for our products and services.

The non-public personal information we collect falls into the following three categories:

- Information we receive from you on applications or Personal Net Worth Statements, whether we receive the forms in writing or electronically. For example, this information may include your name, address, social insurance, assets, liabilities information and possibly your bank account information that permits us to complete various credit bureaus and other reporting.
- Information about your banking and financial history with other financial or credit granting institutions. This category also includes your communications to us concerning your bank account(s) or loan account(s) history.
- Other general information that we may obtain about you such as demographic information.

# To Offer You a Broad Range of Products and Services, We May Share Information Under Limited Circumstances

In order to better service your accounts and provide you with more choices, we may share non-public personal information under limited circumstances described below.

## Within Atuqtuarvik Corporation Structure

Atuqtuarvik Corporation works with other organizations, associations and agencies to provide products and services that benefits our client base. We may share all three categories of non-public personal information among ourselves (this is, among the various departments within Atuqtuarvik Corporation).

#### **Outside of Atuqtuarvik Corporation Structure**

We share all three types of non-public information with third party companies, organizations, associations and credit bureaus only as permitted by law. Below are some examples of third parties to whom we may disclose non-public personal information. All parties are subject to signing a Confidentiality Agreement, both internally and externally. While these examples do not cover every situation permitted under the law, we trust they help you understand how your information may be shared. We may share non-public personal information:

- With consulting firms, companies and individuals that work for Atuqtuarvik Corporation on contract basis analyzing various components of credit requests, or to provide services, opinions or process transactions. For example we may use outside consulting firms to assist with complex analysis of credit requests. With banks for processing transactions and with law firms in the creation and placement of security documentation.
- With a party representing you, such as your accountant, lawyer or consulting firms retained by you or to other third parties at your direction/consent.
- When permitted or required by law, such as in response to a subpoena or other legal process or the use of your social insurance number to submit tax reports to Canada Customs and Revenue Agency.

Additionally, we may disclose all three types of non-public personal information to companies that perform services on our behalf or to other financial institutions with which we do business. These companies are under contractual obligations to protect the confidentiality of your information and to use it only to provide the services we've asked them to perform.

If you wish to withdraw consent to your personal information being collected, used and disclosed for the purpose listed above, please contact us at the number or address listed below. However, in some circumstances, legal requirements may prevent you from withholding or withdrawing consent. We may also limit the products and services we provide to you if you withhold or withdraw consent if the collection, use and disclosure of your personal information are necessary for provisions of the product or service.

#### **Confidentiality and Security**

Our employees are required to follow procedures with respect to maintaining the confidentiality of our customers' non-public, personal information. Additionally, we maintain physical, electronic, and procedural safeguards to protect the information. This includes performing ongoing evaluations of our systems containing customer information and making changes when appropriate.

## **Keeping Current**

On a regular basis, we provide information to you about your loan/equity account. If for any reason your account information needs to be updated or changed, please contact us immediately at the customer service number listed below. We will promptly correct the information and address any inquiries.

## We Review our Privacy Policy

We review our privacy policy annually. Periodically we may revise our privacy policy and will provide you with a revised policy if the changes materially alter the previous policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. At all times, you may view our current privacy policy on our website at <a href="https://www.atuqtuarvik.com">www.atuqtuarvik.com</a> or contact us for a copy at 1-888-645-5901 (Within Nunavut) or 1-867-645-5900.

We have appointed a privacy officer at Atuqtuarvik Corporation to address any concerns, queries or complaints you may have. Our Privacy Officer may be reached at 1-867-645-5908 or by e-mailing the Privacy Officer at <a href="mailto:rsateana@atuqtuarvik.com">rsateana@atuqtuarvik.com</a> by mail at the following address:

Atuqtuarvik Corporation P.O. Box 900, Rankin Inlet, Nunavut X0C 0G0. Attn: Privacy Officer.