

Manulife Mutual Funds (a division of A Ubi `jZ'5 ggYhA UbU] Ya Ybh Limited) **–Statement of Privacy Principles and Practices (“the Policy”)**

At Manulife Mutual Funds (“MMF”), we respect your privacy

Privacy legislation is relatively recent, but for decades, MMF has safeguarded the sensitive personal information of its customers. Protecting your personal information and respecting your privacy is important to us. As a provider of financial products and services, the collection and use of personal information is fundamental to our business. Equally important is your trust in our handling of your personal information.

- Manulife Mutual Funds Privacy Policy
 - The Ten Privacy Principles
 - What our customers should know about our privacy practices

As a member of the Manulife Financial group of companies, we abide by common privacy principles and practices. As such, our customers have the assurance that the same commitment to privacy is maintained in their dealings with any of the Manulife Financial group of companies.

- [Manulife Financial Corporate Privacy Principles](#)
- [Manulife Financial Canadian Division Privacy Policy](#)

Ten Privacy Principles

MMF abides by Ten Privacy Principles as adopted by Manulife Financial Canadian Division. These principles are based on the federal government’s privacy legislation, the *Personal Information Protection and Electronic Documents Act*.

1. **Accountability:** We are responsible for personal information under our control. We have designated individuals who are responsible for monitoring our ongoing compliance with the Privacy Principles.
2. **Identifying purposes:** The purposes for which personal information is collected, will be identified by us, or through our or your authorized representatives.
3. **Consent:** Your consent is required for the collection, use and disclosure of personal information, subject to certain exceptions. Such exceptions are set out in the law and include where legal or security reasons make it impossible or impractical to seek consent. Your consent may be expressed in writing. It may also be given verbally, electronically, or through our or

your authorized representatives. In certain circumstances, it may also be implied.

4. **Limiting collection:** The collection of your personal information must be by fair and lawful means, and be limited to that which is necessary for the purposes identified.
5. **Limiting use, disclosure and retention:** Your personal information may only be used or disclosed for the purposes for which it was collected, other purposes you consent to, or as required or permitted by law. It may only be kept for as long as is necessary to satisfy the purposes for which it was collected, or as required or permitted by law.
6. **Accuracy:** Any personal information that is collected, used or disclosed should be as accurate, complete and as up-to-date as is necessary for the purpose for which it is to be used.
7. **Safeguards:** Personal information shall be protected by security safeguards that are appropriate to the sensitivity of the information, in order to protect your personal information from unwarranted intrusion, release or misuse.
8. **Openness:** Information about our privacy policies and practices for managing your personal information shall be made available to you.
9. **Individual access:** Upon written request, you will be informed of the existence, use and disclosure of your personal information, and you will be given access to it, subject to certain exceptions, as permitted by law. You may also verify the accuracy and completeness of your information, and request that it be amended, if appropriate.
10. **Inquiries and concerns:** You may contact us if you have any inquiries or concerns about our privacy policies and practices.

What our customers should know about MMF’s Privacy Practices

The information we collect

Personal information is information that refers to you, specifically.

For any MMF product or service you obtain, we will tell you the purposes for which we need the personal information we collect.

We will use fair and lawful means to collect your personal information. We will only collect information that is pertinent and consistent with the purposes of the collection. Whenever practical, we will collect the required information directly from you, or from your authorized representative(s), in completed applications and “Know Your Client” forms, through other means of correspondence, such as the telephone, mail or the Internet, and through your business dealings with us.

If your information is being collected by telephone, the call may be recorded or monitored for the following reasons:

- to establish a record of the information you provide;
- for the administration of your accounts;
- to maintain quality service levels;
- to assist in staff training.

If you are not comfortable with having your telephone calls recorded, you have the option of communicating with us in writing, instead. Where you have chosen to only communicate with us in writing, your written communications should request that any response to you be in writing, as well.

What we need to know and why

We collect information from you and about you, only with your consent, or as required or permitted by law. In general, we will collect personal information such as your name, address, telephone number(s) or other identifying information, such as your Social Insurance Number (SIN) or date of birth. The type of additional information we gather will depend on the type of product or service involved.

Generally, we collect, use and disclose your personal information to:

- Confirm your identity, and to protect both you and us against errors, fraud or other misrepresentations;
- Evaluate your financial needs and determine the suitability of our products and services for you;
- Determine your eligibility for products and services;
- Properly administer the products and services we provide;
- Comply with a variety of legal requirements, including any tax reporting obligations under the federal Income Tax Act, or the Quebec Act respecting the Ministère du Revenu.
- Assist us to understand the current and future needs of our customers; and
- Provide you with details of other financial products offered by MMF, its affiliates and other financial services providers.

We will only keep your personal information in our records for as long as it is needed to fulfill the identified purposes, or as required or permitted by law.

Personal information that is no longer required will be destroyed, erased or made anonymous.

When we destroy personal information, we will use safeguards to prevent unauthorized access to the information during the destruction process.

Your Social Insurance Number

There are a number of reasons why we may ask for your Social Insurance Number (SIN).

Where there may be interest income or other income to be reported, your SIN is required by law, in order to meet tax-reporting requirements under the federal Income Tax Act, or the Quebec Act respecting the Ministère du Revenu.

With your consent, we may also use your SIN as a unique identifier, in situation(s) where it is necessary to keep your personal information separate from that of other customers, or individuals with similar names, for internal matching of your personal records against records exchanged with authorized third parties and to help maintain the accuracy of your personal information.

You may elect not to have your SIN used for purposes other than as required by law, however, as explained earlier, this will affect our ability to fully ensure the accuracy of your personal information.

Your consent

We collect, use and share your personal information only for disclosed purposes related to the servicing of any product or service you have with us, and only with your consent, or as permitted by law. Your consent may be expressed in writing, or it may be given verbally, electronically, or through our, or your authorized representative(s), such as your financial services advisor.

Your consent may also be implied or inferred from certain actions. For example, if you fill out an MMF application form with your dealer, it is understood that you are giving your consent for your dealer to provide your personal information to us, in order for us to open an investment account for you.

Generally, the disclosure of your personal information will be restricted to those who have a need for, and the right to, the information.

Your personal information will only be provided to, or be accessible by:

- Our employees who need the information in the performance of their duties for us;
- Parties representing you, such as your financial advisor;
- Fund companies or other issuers of investments named in any forms completed for your benefit;
- Service providers, which need the information, in the performance of their duties for us;
- Any person or organization to whom you gave consent; and,
- Anyone who is otherwise authorized by law.

In some cases, your personal information may be provided to these people, organizations and service providers in other provinces or jurisdictions outside Canada, and would

therefore be subject to the laws of those provinces or jurisdictions.

Withdrawal of Consent

You may **withhold or withdraw** your consent for us to collect, use and disclose your personal information, as long as there are no legal or contractual reasons preventing you from doing so. Depending on the circumstances, however, withdrawal of your consent may impact our ability to continue to provide you with the products and services you have requested.

If you withdraw your consent for MMF to collect, use and disclose your personal information, MMF may no longer be able to properly administer your products and we will require the redemption and closure of your investment account (subject to penalties as stated in the Simplified Prospectus, if applicable). Notwithstanding such withdrawal of consent by you, MMF may be required by law to maintain and use your personal information for record keeping, tax and financial reporting.

Service Providers

We may use service providers to provide us with various services such as, printing, mail distribution, information technology, data storage, marketing and administration. Where personal information is provided to our service providers, we will require them to protect the information in a manner that is consistent with our privacy policies and practices.

Accessing and amending your information

We will make all reasonable efforts to ensure that any personal information we collect and keep is as accurate, complete and as up-to-date as required for the identified purposes. To do so, we will rely to a large extent on you to provide us with accurate information and to inform us of changes, such as changes in your contact information. You have the right to access and verify your personal information maintained in our files, and to request that any factually inaccurate personal information be corrected, if appropriate. Depending on the circumstances, we may not always be able to give you access to all information. Should this happen, we will explain why.

We are committed to protecting your information

We are committed to protecting your personal information from unauthorized access or use, by ensuring that the necessary physical, organizational and technological safeguards are in place, that are appropriate to the sensitivity of the information. Essentially, this means that personal information is protected:

- Physically, by building security measures and physical barriers;
- Organizationally, by our policies, procedures and access levels; and,
- Technologically by, for example, the use of passwords, encryption, firewalls, anti-virus and anonymizing software.

All of our employees, representatives, agents and service providers, who act on our behalf, are required to abide by our privacy policies and practices.

If we receive a request to release your personal information, we will only do so upon satisfactory identification and proof of entitlement of the requestor, or as required or permitted by law.

Special offers and marketing promotions ... it's your choice

From time to time, we may promote our other financial products or services, or those of our affiliates, as permitted by law. We do so because we believe these other financial products or services may be of interest to you.

Please note that we do NOT SELL your personal information to anyone. Furthermore, we do not share your personal information with any organization outside of our member companies, for the purpose of that organization marketing their own products or services directly to you.

If you do not wish to receive our marketing offers or special promotions, you may choose to "opt out", by simply contacting us. This means you will not be eligible to receive addressed, direct mail offerings. This opt-out will **not** extend to:

- Information included in or with statements or other materials associated with the administration of your account, which relate to any MMF product or service that you currently have with or receive from us; or
- General product and service information and updates included in or with client statements.

To opt-out of other product offerings please contact us by telephone or mail. **Please note:** When you contact us to opt-out, we will use all reasonable efforts to do so in a timely fashion. If you are applying for a new product or service, we will process your request immediately. Otherwise, if you have an existing product or service with us, we will generally require a reasonable period of time, which may vary, depending upon the product or service, to process your request.

Contact us

If you have any questions or concerns about our privacy policies and practices, or you want to know more about the process for accessing and / or correcting your personal information, or opting-out of other product offerings, please contact us:

Mail: **The Privacy Officer**
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North Tower 3
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