

## Privacy Policy and Cookies Policy

BlackRock Asset Management Canada Limited (“We” or “BlackRock”) recognizes the importance of protecting your personal and financial information when you visit our websites or download a mobile application created or commissioned by BlackRock (each a “Website” or “App” and together “Website and App”). This Policy including the Cookies Policy is designed to help you understand the information collection practices on a Website and App owned or operated by or on behalf of BlackRock, including (but not limited to) [www.blackrock.com/ca](http://www.blackrock.com/ca). Information collected on our Website and App is collected by BlackRock Asset Management Canada Limited but may be shared with other entities within the BlackRock group of companies as set out below. Contact information is included in this Policy and on the Website.

We are committed to:

- (a) protecting the personal information you provide to us;
- (b) telling you how we use the information we gather about you; and
- (c) ensuring that you know the circumstances under which we may disclose your personal data.

This Policy covers the privacy and data protection policies on our Website and App, and should be read in conjunction with any other applicable policies, terms, and conditions in place between you and BlackRock.

### Changes to this Policy

This Policy is dated March 2017.

BlackRock may amend this Privacy Policy at any time to reflect changes in its personal information practices. The updated Privacy Policy will be posted on the Website and App. The current version of this Policy can be accessed from the link on the homepage, or at the bottom of our other website pages. We strongly encourage you to please refer to this Privacy Policy often for the latest information about our personal information practices. Where necessary, we will obtain additional consent for material changes to this Privacy Policy.

### *Contact Us*

If you have any questions or complaints about this Policy, or the privacy-related practices of BlackRock or its service providers (including information regarding our policies and practices relating to services providers located outside of Canada), please contact us:

- through your usual contact or at Global Privacy Officer, c/o BlackRock Asset Management Canada Limited, 161 Bay Street, Suite 2500, P.O. Box 614, Toronto, ON, M5J 2S1; or
- by email at [blackrockcanada@blackrock.com](mailto:blackrockcanada@blackrock.com).

## **Data Protection and Privacy**

### **Information Collection and Use**

#### *Personal Data*

The personal data and other information you submit to our Website and App is used to service your account, provide you with the product or service you request, to improve our services to you and/or to provide you with information on BlackRock products and services (which may be tailored to your interests and content that you have viewed on the Website and App). The types of personal information that may be collected at our Websites and Apps include: name, address, email address, telephone number, user name and password. We will not sell, share or rent your personal information to others in contravention of this Privacy Policy.

In the password protected section of our Website or App, or if you are a visitor who has entered the Website or App via a click through link in an email which we have sent you, information about you, including information about the pages you visit, the documents you download and other information which can help us personalize our future interaction and communications with you may be collected. Any information collected about you from this Website and App may be associated with other identifying information that we have about you for the purposes set out above.

#### *Your Rights*

You may contact us to:-

- request that we amend, rectify, delete or update the personal data we hold about you;
- amend or update your choices around processing (i.e., in relation to marketing);
- request access to, or a copy of, personal information held by us.

Where you would like to request access to or receive a copy of all personal information held, such request should be in writing (email or post), addressed to “Canadian Access Request” c/o our Global Privacy Officer at the contact information above and should contain as much information as possible to facilitate our dealing with this request.

### *Aggregate Information*

We generally record certain usage information, such as the number and frequency of visitors to our Website and App. This information may include the websites that you access immediately before and after your visit to our Websites and Apps, the Internet browser you are using pages requests, operating system, average time spent on our Website, and your IP address. If we use such data at all it will be on an aggregate basis, and we will not disclose to third parties any information that could be used to identify you personally. We use this information to help us understand our Website activity, and to monitor and improve our Website.

### *Sharing your information with Service Providers (including other BlackRock companies)*

Your personal data may be collected and processed on our behalf for the purposes above:

- (i) By any of the companies within the BlackRock group; or
- (ii) By a third party service provider engaged by us for these purposes.

For example, BlackRock may use service providers to send email or other communications that are tailored to your interests and host, manage, and analyze data. BlackRock companies and service providers we engage may be based in countries outside of Canada. As such, your personal information may be maintained and processed by our affiliates and other third party service providers in Canada, United States, United Kingdom, European Union, India or other international jurisdictions in countries having different standards of protection for personal information. Our service providers will be required by us to protect your information in accordance with applicable data protection and/or privacy laws and not use the information for any purpose other than providing the service to us.

### *Compliance with Laws*

Your personal information will be held and processed by us in accordance with applicable data protection and/or privacy laws.

We and our service providers will not provide any personal information to any other persons, except if we or our service providers are required to make disclosures by any applicable law (which may include lawful access by U.S. or foreign courts, law enforcement and other governmental entities), any government or private parties in connection with a lawsuit, subpoena, investigation or similar proceeding or as otherwise required or permitted by applicable law.

### *E-mail and Marketing*

BlackRock does not sell its clients' personal information, nor will we provide your personal information to third parties for their marketing purposes without your consent. BlackRock will not send you e-mail messages without first receiving your permission, unless it relates to servicing your account or unless you have consented to receiving electronic delivery of fund documents as part of our E-Delivery service. It is our policy to include instructions for unsubscribing from these permission-based programs in each message.

### *Business Transfers*

If the business, stock or assets of BlackRock are acquired or merged with another business entity, we will share all or some of your information with this entity to continue to provide our service to you. You will receive notice of such an event and the new entity will inform you of any changes to the practices in this Privacy Policy. If the new entity wishes to make additional use of your information, you may decline such use at such time. We may also share personal information in connection with a prospective business transaction.

### *App Notifications*

If you consent to receive push notifications through an App, we will send push notifications to your mobile device notifying you of new articles or other content available through the App. The push notifications may be tailored based on your interests and content that you have viewed on the App. If you do not want to continue to receive push notifications you can always withdraw your consent by changing your settings via the settings page of your mobile telephone.

### *Disclosure to Third Parties*

The personal information you provide to us will only be disclosed to third parties if we have your permission, or as set out in this Privacy Policy. We may disclose aggregated information about the general use of our Website and App to third parties – for example, to demonstrate patterns of use to advertisers and other business partners. Information we pass on for this purpose will not include any personal information by which you may be identified. We endeavour to prevent unauthorized disclosures of your personal information by third parties but we are not responsible for any unauthorized disclosures or other breaches of security or for the actions of others if the information was passed to them with your authority.

### *Third Party Websites and Apps*

BlackRock may establish links between the Website and App and one or more websites operated by third parties. BlackRock has no control over any such other websites, the contents therein or the products/services offered. Your access to and use of such linked websites is governed by the terms of use and privacy policies of those sites, and shall be at your own risk. BlackRock disclaims responsibility for the privacy policies and customer information practices of third party internet websites hyperlinked from our Website and App or this Privacy Policy.

### *Security*

We have implemented reasonable physical, technical and administrative safeguards in an effort to protect personal information in our custody and control from theft, loss and unauthorized access, use, disclosure. We recommend that you do not send us any personal information via non secure methods of correspondence, including via public electronic communication channels, such as Internet e-mail, which are generally not secure.

BlackRock protects your personal information when you transact business on our Website and App by requiring the use of a browser software program that supports industry standard SSL encryption with 128-bit key lengths. The "128-bit" designation refers to the length of the key used to encrypt the data being transmitted, with a longer key representing a higher level of security.

## **Cookies Policy**

### *What are cookies?*

Cookies are small text files that are stored in your computer's memory and hard drive, in your mobile device or tablet when you visit certain web pages. They are used to enable websites and applications to function or to provide information to the owners of a website, application, or other third parties which receive data obtained from that website or application.

When you visit any web site or use an application, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information is used to provide you with a more personalized web or application experience.

*Why do we use cookies?*

Cookies help us to provide customized services and information. We use cookies on all our Websites and Apps to tell us, in general terms, how and when pages in our Websites and Apps are visited, what our users' technology preferences are – such as what type of video player they use – and whether our Websites and Apps are functioning properly. Depending on their purpose, some cookies will only operate for the length of a single browsing session, whilst others have a longer life span to ensure that they fulfil their longer-term purposes (as explained in more detail below). Please note that, however long the cookies' active life may be, you can delete cookies (and therefore stop any further data collection by them) as further described below.

If you are using one of our password-protected sites, then the Website and App may use cookies or other technology to help us authenticate you, store and recognize your configuration and user attributes, facilitate your navigation of the website or application and customize its content so that the information made available is likely to be of more interest to you.

In broad terms, we use cookies on our Website and App for the following purposes:

- *Analytical purposes:* We or third parties may use analytical cookies on the Website and App. Analytical cookies allow us to recognize, measure and track visitors to our Websites and Apps and compile a record of this usage information (including areas visited and links clicked). This helps us to improve and develop the way our Websites and Apps work, for example, by determining whether site visitors can find information easily, or by identifying the aspects of our Websites and Apps that are of the most interest to them in order to provide articles and content that are tailored to their interests and preferences.
- *Usage preferences:* Some of the cookies on our Websites and Apps are activated when visitors to our sites make a choice about their usage of the site. Our Websites and Apps then 'remember' the settings preferences of the user concerned. This allows us to tailor aspects of our sites to the individual user.
- *Terms and conditions:* We use cookies on our Websites and Apps to record when a site visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on our Websites and Apps. This helps to improve the user's experience of the site or application – for example, it avoids a user from repeatedly being asked to consent to the same terms. We also track whether a user has seen other similar documents (such as an online survey) before – again, to ensure that a user's experience of our Websites and Apps is a smooth one.

- *Session management:* The software that runs our websites and applications uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the site to function.
- *Functional purposes:* Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

#### *Interest-Based Advertising*

- *Advertising:* We and third party advertising companies may use cookies, tracer tags or web beacons to collect information about your visits to our Websites and Apps and other websites and applications in order to serve advertisements that are more relevant to you on our Website and App and on other third party websites and applications. This information is used to ensure that products and services highlighted to those individuals are targeted in a focused and relevant manner – e.g., through advertisements on BlackRock websites or through advertisements on third-party websites which are based on your experience with our Websites and Apps and other websites (such as web pages you visit and your response to ads); or to monitor the effectiveness of those digital marketing campaigns and ensure that adverts seen by users of our Websites and Apps over a period of time are appropriate. To learn more or to opt-out of online interest-based advertising by a list of companies participating in the Digital Advertising Alliance of Canada, visit <http://youradchoices.ca/choices>. Please note that if you opt out of receiving interest-based ads, you will continue to receive advertising, but it will not be based on online behavioural information about you.

#### *Your cookie preferences*

Cookies are necessary in order for you to be able to make full use of BlackRock's Websites and Apps. In addition, cookies help us provide you with personalized features on our Websites and Apps. If you wish to remove cookies set by our Websites and Apps from your browser in the future, you may delete them. The instructions for removing cookies from your computer or mobile device depend on the operating system and web browser you use. If you chose to disable cookies, some of BlackRock's Website's functionality might be impaired.

### *Local Flash Storage*

On certain of our Websites and Apps, we include content designed for display using Adobe Flash Player, such as animations, videos and tools. Local flash storage (often referred to as “Flash cookies”) can be used to help improve your experience as a user. Flash storage is retained on your device in much the same way as standard cookies, but is managed directly by your Flash software.

If you wish to disable or delete information stored locally in Flash, please see the documentation for your Flash software, located at [www.adobe.com](http://www.adobe.com). Please note that, if you disable Flash cookies, some site functionality may not work.

The site [www.allaboutcookies.org](http://www.allaboutcookies.org) includes instructions for managing cookies on many commonly used browsers, or you may consult the vendor documentation for your specific software.

### *Further information about cookies*

If you would like to find out more about cookies in general and how to manage them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).