

## California Consumer Privacy Act Disclosures

Last Modified and Effective Date: January 20, 2022

This notice and policy supplements information contained in privacy disclosures from Sprott Inc. and its corporate business affiliates and subsidiaries (“Sprott”) and applies solely to residents of the State of California (“consumers” or “you”). Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”) have the same meaning when used in this notice and policy. This notice and policy does not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception under the CCPA applies. You can download a pdf version of the notice and policy *here*.

### **1. RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED AND DISCLOSED, AND TO REQUEST DELETION OF PERSONAL INFORMATION**

You have the right to request that we disclose what personal information we collect, use, or disclose about you specifically (“right to know”) and to request the deletion of personal information. To submit a request to exercise the right to know, please submit an email request to [privacy@sprott.com](mailto:privacy@sprott.com) or call our toll-free number at 855-943-8099. To submit a request to delete personal information, please submit an email request to [privacy@sprott.com](mailto:privacy@sprott.com) or call our toll-free number at 855-943-8099.

Sprott may ask that you provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Sprott will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

When a business sells your personal information, you have a right to opt out of such sale. Sprott does not sell, and in the preceding 12 months did not sell, California residents’ personal information. Sprott does not have actual knowledge that it sells the personal information of minors under 16 years of age.

### **2. PERSONAL INFORMATION HANDLING PRACTICES**

We have set out below categories of personal information we collect about California residents and have collected in the preceding 12 months. For each category of personal information we have collected, we have included the reference to the enumerated category or categories of personal information in the CCPA that most closely describe such personal information.

**Corresponding reference to category of personal information under CCPA definition of personal information**

**Category of personal information**

**Identifiers.**

Name, telephone number, residential address, e-mail address, IP address, driver’s license number, social security number, passport number, banking information

**Personal information categories listed in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)).**

Name, date of birth, age, gender, telephone number, residential address, e-mail address, IP address, driver’s license number, social security number, passport number, financial information, occupation, employment history, credit history, information about third parties required by law or performance of contract (e.g. information about your spouse)

<b>Characteristics of protected classifications under California or federal law.</b>	Gender, age
<b>Commercial information.</b>	Browsing history; investment and services history
<b>Biometric Information.</b>	N/A
<b>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web website, application, or advertisement.</b>	IP address, domain name, browsing history, browser type, settings, and capabilities, device type and settings, operating system, network information, time of visit, duration of visit, date and time stamps of actions
<b>Geolocation data.</b>	IP location
<b>Audio, electronic, visual, thermal, olfactory, or similar information.</b>	N/A
<b>Professional or Employment related information.</b>	Occupation, employment history
<b>Education information.</b>	Education history
<b>Inferences drawn from any of the information.</b>	Predictions of behavior, interests, preferences, and needs

Sprott collects such information from the following categories of sources:

- **Directly from you.** For example, when you contact or request information from us including via the Sprott websites, when you create a Sprott account, or through meetings and telephone conversations with you.
- **Third Parties, including Service Providers.** For example, service providers that Sprott uses and other third parties that Sprott chooses to collaborate or work with, or your financial advisors or dealers that provide information to us on your behalf.
- **Using cookies and automatic collection methods.** Sprott and its service providers may collect information from the computer, tablet, phone, or other device that you install our mobile application on, that you use to access our websites, or that you use to open an email or click on an advertisement from Sprott. Sprott does not respond to “do not track signals.”

Sprott collects, uses, retains, and discloses your personal information for the purposes described below:

- Establish your identity and verify the accuracy of your information, such as to confirm your identification;
- Provide you with our services, such as to; use the websites and execute your transactions; process, maintain and service your account(s); provide you with confirmations, tax receipts, proxy mailings, financial statements and other reports; enable service providers to perform the services offered on our

websites; determine the suitability of our services for you and your eligibility for our services; market products and services that may be of interest to you;

- Register an account, manage user relationship, and communicate with you;
- Measure user engagement with the websites, and detect viewing history;
- Handle and record consumer rights requests, including opt-ins and opt-outs;
- Monitor, protect and improve Sprott security assets and resources, including devices, systems, customer data, infrastructure, and Sprott network;
- Prevent or detect fraud or criminal activity; and
- Comply with laws, regulatory requirements and to respond to lawful requests, court orders and legal processes.

### **3. SHARING OF PERSONAL INFORMATION**

In the preceding 12 months, Sprott disclosed the above categories of personal information to the following categories of third parties for a business purpose, in some cases as directed by you:

- **Sprott Affiliates and Subsidiaries.** For example, Sprott affiliates and subsidiaries may share business processes and common data systems.
- **Third parties and service providers that provide products or services to us.** For example, your financial advisors or dealers, or other financial service providers that facilitate transactions or operations on your behalf. Sprott may use third parties or service providers to help with auditing interactions and transactions with you, addressing security, fixing errors, advertising or marketing, maintaining accounts and providing customer service, internal research, verifying service quality or safety, document storage and shredding, and mail distribution.
- **Government regulatory authorities.** For example, we may be required to report your income to taxation authorities, or disclose your personal and business information to self-regulatory organizations, such as the U.S. Securities and Exchange Commission and the Financial Industry Regulatory Authority.

### **4. RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF CCPA RIGHTS**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of California Civil Code § 1798.125.

### **5. AUTHORIZED AGENT**

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California and the agent provides proof that you gave the agent signed permission to submit the request; and
- You directly confirm with Sprott that you provided the authorized agent with permission to submit the request.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please provide any information Sprott requests to verify your identity. The information that Sprott asks you to

provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

## **6. CONTACT FOR MORE INFORMATION**

If you have any questions or comments about this notice and policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, please do not hesitate to contact us at:

Sprott Inc.  
Royal Bank Plaza, South Tower  
200 Bay Street, Suite 2600  
Toronto, Ontario M5J 2J1  
Canada

Telephone: 416-943-8099

Toll Free: 855-943-8099

Email address: [privacy@sprott.com](mailto:privacy@sprott.com)