

1. FOR ALL WEB SITE USERS

We recognize the confidentiality of the personal information of our Web users and are committed to protecting your personal information in accordance with the terms of this Privacy Policy.

This Privacy Policy (“Policy”) explains the treatment of your personally identifiable information collected in connection with activities on or related to all iTrust Web sites referencing this Policy (the "ITR Sites"), including iTrust.net, iTrustAdvisors.com, iTrustFinancial.com and .net, iTrustMetrics.com, iTrustRealReturns.com, iTrustIndex.com and iTrustReport.com as well as all services made available on the ITR Sites (collectively, unless noted otherwise, called "ITR Services"). This Policy also explains how you can contact us to ask about our privacy practices, or to review and update your personal information.

Read this Policy carefully and please check back periodically as the Policy may change from time to time. This Policy applies only to the practices of companies or web sites which are controlled by ITR.

2. INFORMATION COLLECTED

In the course of providing ITR Services, we may collect two types of information about our users: Personal Information and Summary Data.

"Personal Information" refers to any information that specifically identifies you as an individual and is provided to or collected by us. It includes, but is not limited to, information such as your name, address, email address, birth date and gender. Personal Information is collected by us if you provide it to us when registering for an ITR Service such as when you choose to subscribe to an ITR Service, register for participation in a discussion forum or choose to receive a newsletter. If you choose to contact our customer service personnel, then we may keep a record of that correspondence so that we can fully address your requests for information. From time to time, we may also receive Personal Information from our business partners and other third parties, provided that they confirm to us that you have permitted them to share such information. We may also request that you provide us with your opinions and interests for marketing purposes, should you consent to this use. This information is also considered Personal Information if it can be used to identify you personally. In some contexts in this Policy, Personal Information may also be referred to as “Account Information” or “Registration Information”.

Business contact information such as the name, title, business address, email address or telephone number of a business or professional person or an employee of an organization is not considered Personal Information.

"Summary Data" is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access an ITR Service, and the type or version of browser or operating system being used. Aggregate information, such as demographic statistics of our users (e.g. average age or geographical allocation of our users), number of visitors and average time spent on a ITR Service is also considered Summary Data. It is collected or calculated from site statistics in the operation of ITR Services. Our Web servers may automatically collect Summary Data provided through your browser or stored on a Cookie when you choose to visit an ITR Service. Summary Data is used by ITR as described here.

3. USE OF PERSONAL INFORMATION

We need to collect, use and disclose certain types of Personal Information in order to provide you with the ITR services and information that you request. Should you decline to provide such information, we may not be able to fulfill your requests. The Personal Information we collect will only be used with your consent. When you provide your Personal Information to us, you consent that it may be used for the following purposes:

(a) To facilitate your viewing of ITR Sites and to communicate with you for the purposes of providing you with the services and information you have requested; (b) To contact you from time to time about any changes or similar notices only in connection with your current ITR Services; and

(c) To compile broad demographic and web site usage information about our users in general that does not contain anything that could be used to identify you personally.

If you indicated that you were interested in receiving offers or promotional information from ITR or our sponsors and partners, you consent that ITR, our sponsors or partners may use your Personal Information to send you email materials and other mailings about products and services that we feel may be of interest to you. Your Personal Information will only be used for this purpose if you have consented to receive such information. If at any time you would like to end your subscription to any such email materials, please follow the directions posted at the bottom of the email material.

ITR may also use Personal Information if it has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or other laws or in order to protect or defend a legal interest.

4. DISCLOSURE OF PERSONAL INFORMATION

ITR will not sell or rent your Personal Information to anyone. We will only disclose your Personal Information to third parties under conditions such as the following:

- (a) You have specifically given us your consent to disclose your Personal Information for a specific purpose;
- (b) The third party is acting on behalf of ITR as our agent, supplier or service provider, to enable us to more efficiently provide you with ITR Services. Such entities act under strict contractual controls, requiring them to maintain the confidentiality of all such Personal Information and to use such information solely for purposes related to the provision of the ITR Services;
- (c) To facilitate the provision of ITR Service, such as fulfilling legal requirements, as may be set out in the Terms and Conditions applicable to an ITR Service;
- (d) To protect or defend a legal interest as required by law, including by an order of any court, institution or body with jurisdiction or authority to compel the production of information; or
- (e) To be used for the purposes permitted by this Policy, but by an entity acquiring the information in connection with an ITR re-organization, merger or amalgamation with another entity, or a sale of all or a substantial portion of the assets of ITR.

5. LINKS TO OTHER SITES

ITR Services may contain links to other web sites and services. We can not be held responsible for the content of other sites or their privacy practices.

This Policy applies only to the ITR Services referencing this Policy.

Advertisements for sponsors which may be displayed in connection with ITR Services are usually provided directly by ITR, but may be provided by a reputable third party partner. If you would like to know more about what Summary Data is collected and how that information is used by our partners, please contact us.

6. SECURITY

The security of your Personal Information is important to us. ITR maintains technical, contractual, administrative, and physical security controls to protect Personal Information that you provide to us from unauthorized use, alteration, duplication, destruction, disclosure, loss or theft. For example:

- (a) We provide you with a secure web page through which to submit your Registration Information when you request an ITR Service;
- (b) We have strict procedures in place when disposing of Personal Information when it is no longer required for the purposes set out in this Policy, or by law;
- (c) In situations where you pay for a ITR Service, using the links through a services provider such as PayPal, for example, we do not receive access to your credit card information. We have chosen the service provider based on the understanding that they work to protect the security of your credit card information during transmission by using industry standard Secure Sockets Layer (SSL) encryption technology; and
- (d) We instruct our employees with access to your Personal Information that it is to be used only in adherence with the principles set forth in this Policy and the laws applicable to each specific business.

You can further help protect the security of your Personal Information. For instance, never give out your password as it can be used to access your Account or Registration Information. If you use a shared computer, ensure that you have completely logged off and have closed all browser windows at the end of an online session so that your Personal Information cannot be accessed by others.

7. RETENTION POLICY

We only maintain Personal Information for as long as it is needed to meet the purposes set out in this Policy. The length of time we retain your Personal Information depends on:

- (a) The type of product or service you request from us; and
- (b) Any legal or regulatory requirements we may have to meet. For example, we must be able to respond to any concerns you may have, even after we have processed your service requests. Our retention policy is that we destroy Personal Information when it is no longer needed.

8. ACCESSING AND CHANGING ACCOUNT OR REGISTRATION INFORMATION

ITR provides you with the means to access, update, edit and delete any Registration Information you may have provided to us at any time on your own by going to the appropriate page in the Registration section of the relevant ITR Service, and by changing or deleting such information as desired.

If you are unsure whether we have a record containing any of your Personal Information and would like to confirm whether or not we do, please send an e-mail to us at Privacy@AbraxasResearch.com indicating all email addresses that you may have given us.

There may be instances in which we will not be able to disclose some of the Personal Information we hold about you. These include, but are not limited to, cases where Personal Information:

- (a) Contains references to other persons;
- (b) Is subject to solicitor-client or litigation privilege;
- (c) Contains our own proprietary information that is confidential to us;
- (d) Has already been destroyed due to legal requirements, or because we no longer needed it for the purposes set out in this Policy; and
- (e) Otherwise cannot be disclosed for legal reasons.

If we are unable to provide you with access to your Personal Information, we will explain our reasons for not fulfilling your request.

9. CHANGES TO THIS POLICY

From time to time, ITR may change this Policy as new ITR Services are added or old ones are changed. Changes will be effective when notice of such change is posted on an ITR Site. You are advised to check this Policy regularly for updates by checking the date of "Last Update" at the bottom of this document.

10. ADDITIONAL PRIVACY PROCEDURES

Privacy procedures specific to an ITR Service can be found on an ITR Site at the location of the particular ITR Service or in additional terms referenced by the ITR Site. These procedures serve as an addendum to this Policy, and are provided to you at the place where they will be of most use and relevance to you.

11. QUESTIONS, COMMENTS OR SUGGESTIONS

If you want to contact us, or if you have questions, comments or suggestions about this Policy or the privacy practices of ITR that were not addressed here, then please send us an e-mail at services@itrust.net.

DATE OF LAST UPDATE: 1 DECEMBER 2013