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## **COOKIE POLICY**

**Canada**

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**Version 1.1**

**Policy Reference No: PRI-11.23/1.1-26**

**April 8, 2026**

Legal, Regulatory and Governance Office

**Notice of Copyright**

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**REVISION HISTORY**

<b>VERSION</b>	<b>DATE</b> <b>MM/DD/YYYY</b>	<b>AUTHOR/ REVIEWER</b>	<b>REVIEWER/ APPROVER</b>	<b>DESCRIPTION</b>
1.0	06/15/2023	RD	B. Beck	
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1.0	04/08/2024	R Graham	B Beck	Annual review; No changes
1.0	04/08/2025	R Graham	B Beck	Annual review; No changes
1.1	04/08/2026	D Dennis / M Bolt	B Beck	Annual review

**RELATED DOCUMENTS**

<b>Reference</b>	<b>Document Title</b>
Privacy	Website Cookie Disclaimer and Acceptance
PRI-01.11 USA	The Gramm Leach Bliley Act Privacy Policy

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PRI-02.11 CAD	Privacy Policy Canada
PRI-02.13 USA	California Financial Information Privacy Policy
PRI-06.19 UK	GDPR Privacy Policy
Privacy	Direct Marketing Practices
Canada	Canada's Anti-Spam Legislation (CASL)
USA	CAN-SPAM Act

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## 1. PURPOSE

AscendantFX Capital Inc. (“Ascendant”) and its affiliate websites uses cookies and similar tracking technologies on its websites and digital platforms. This policy describes how and why we use cookies and your rights in relation to such use.

## 2. POLICY DETAILS

### 2.01 How We Use Cookies

We use cookies for a variety of reasons detailed below.

Where required by applicable law, we will obtain your prior consent before placing or accessing non-essential cookies (including analytics, advertising, and functionality cookies) on your device.

If declined, we will store a minimal cookie to remember your preferences.

Strictly necessary cookies are always active as they are required for the website to function.

You may withdraw or modify your consent at any time via our browser settings.

### 2.02 Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will impact functionality of the Ascendant website; however, this choice remains entirely at your discretion.

### 2.03 Types of Cookies We Use

#### STRICTLY NECESSARY COOKIES

These cookies are necessary for the operation of the website and cannot be disabled. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms.

#### FUNCTIONALITY COOKIES

These cookies enhance our website functionality and personalization. They are used to optimize your experience as well as remember your chat history. Functionality cookies are only used with your consent where required by law.

#### ADVERTISEMENT COOKIES

We use cookies to make our ads more engaging and valuable to site visitors. Some common applications of cookies are to select advertising based on what’s relevant to a user; to improve

reporting on ad campaign performance; and to avoid showing ads the user has already seen. These cookies may be set by us or third-party providers and may track your browsing activity across websites.

#### ANALYTICS COOKIES

These cookies help us to understand how visitors engage with the website. We may use a set of cookies to collect information and report site usage statistics. In addition to reporting site usage statistics, data collected may also be used, together with some of the advertising cookies described, to help show more relevant ads across the web and to measure interactions with the ads we show. Information collected may include IP address, device identifiers, and browsing behaviour.

### 2.04 Third-Party Cookies and Data Transfers

We may allow third-party service providers (e.g., Google Analytics, HubSpot) to place cookies on your device. These providers may process your personal information in jurisdictions outside of Canada, including the United States.

We take reasonable steps to ensure that such third parties provide a comparable level of data protection in accordance with applicable privacy laws.

### 2.05 Cookie List

Name	Source	Purpose	Expiration
Google Analytics	Google	Used to monitor website behavior	Up to 26 months
Hubspot	Hubspot	Utilizes necessary, analytics, functional, and advertisement cookies for the website. Please see above for description.	Varies (session to 2 years)
Ascendant	Ascendant	Used for necessary and functional purposes on the website.	Session / Persistent
BugHerd	BugHerd	Functional cookie used to track website bugs.	Session

### 2.06 Your Rights

Depending on your jurisdiction, you may have the right to:

- Withdraw consent at any time
- Access information collected via cookies
- Request deletion of personal data
- Object to tracking technologies

### 2.07 Contact Information

If you have questions about this policy or our use of cookies, please contact:

Privacy Officer  
AscendantFX Capital Inc.

privacy@ascendant.world

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## **2.08 Changes to this Policy**

We may update this policy from time to time.

Material changes will be communicated where required by law.