

THE ROYAL CANADIAN MINT PRIVACY NOTICE

HEFFEL GALLERY LIMITED (Heffel) is acting as an agent to sell the Ultimate coin and associated drawings (the “Lot(s)”) of the Royal Canadian Mint (Consignor) by way of this auction. Participating in the auction for the Consignor’s Lot(s) requires that you provide both the Consignor and Heffel with your personal information, including but not limited to your name, date of birth, address, contact information, language preference, banking and financial information. Any questions in the registration that are optional are clearly identified as such. Choosing not to provide responses to any or all optional questions will not disallow you from registering for the auction.

COLLECTION

The collection and use of your personal information by the Consignor is authorized under the *Royal Canadian Mint Act* and the Consignor is governed by the *Privacy Act* for the duration of its retention period in relation to this auction. Heffel is subject to the *Personal Information Protection and Electronic Documents Act* (PIPEDA), which establishes rules to govern the collection, use and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information and the need for organizations to collect, use or disclose personal information. Your use of the Heffel website and Heffel’s management of your personal information are subject to its privacy statement. Any secondary use and retention outside of the Consignor’s requirements by Heffel of the personal information collected under the auspices of this auction requires separate legal authority.

The personal information collected via the bidder registration process is under Heffel’s custody and management. Heffel will disclose directly and securely to the Consignor all registered bidders’ full names, dates of birth, addresses and email addresses. The Consignor will retain this information in accordance with its established retention schedule.

USES

Your personal information will be used for the following purposes:

- To register as a participant in the auction (by Heffel via its bidder registration webpage and/or forms);
- To conduct a preliminary Know Your Customer (KYC) screening on all registered bidders (by the Consignor using full name, date of birth and address);
- To contact and complete a full KYC on the winning bidder (by the Consignor via its KYC forms);
- To validate the absence of a third party payment by the winning bidder for the Consignor’s Lot(s) (by Consignor using banking information obtained via Heffel and Consignor KYC forms);
- To complete the sale of the Consignor’s Lot(s) (by Heffel using financial information);
- To complete shipment of the Consignor’s Lot(s) (by the Consignor using contact information); and
- To communicate with individuals about the auction over the course of the auction process (by the Consignor and/or Heffel using contact information).

DISCLOSURES

The Consignor may disclose to Heffel the results of the preliminary KYC screening as required. Heffel will disclose to the Consignor the eventual winning bidder’s banking information for the purpose of the Consignor validating that the proceeds paid by the winning bidder to the Auction House originated directly from the same bank account as provided to the Consignor during the full KYC assessment (i.e. to validate the absence of third party payments for the Lot(s)). The full KYC information collected from the eventual winning bidder (see more below) will not be disclosed to Heffel and will remain under the Mint’s custody and control.

WINNING BIDDER

The eventual winning bidder will be required to provide additional personal information in order for the Consignor to complete a full KYC review. Failure to do so may result in the cancellation of the sale of the Lot(s) to the winning bidder. This KYC due diligence requirement and the related collection of personal information is authorized under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA). This personal information will only be used by the Consignor for the purpose of conducting the KYC assessment. In the eventuality that the winning bidder does or does not successfully pass the KYC review, this may be communicated to Heffel. Personal information as prescribed by the PCMLTFA Regulations may be shared with the Financial Transactions and Reports Analysis Centre (FINTRAC) and the Consignor may disclose to the appropriate law enforcement agencies any information of which it becomes aware in exercising its compliance functions and that it suspects on reasonable grounds would be relevant to investigation or prosecuting an offence under the PCMLTFA.

QUESTIONS AND COMPLAINTS

Any questions, comments, concerns or complaints you have regarding this statement, your privacy rights or the Consignor’s or Heffel’s governing privacy legislation and related obligations may be directed to:

- The Mint’s Privacy Office: privacy@mint.ca;
- Heffel, to the attention of Rebecca Rykiss: rebecca@heffel.com.

You have the right to file a complaint with the Office of the Privacy Commissioner of Canada concerning the handling of your personal information within this initiative. For more information, please visit their website at <https://www.priv.gc.ca/en/>.