

PERSONAL INFORMATION PROTECTION POLICY
(Condensed Version)

STARDYNE GROUP COMPANY

PERSONAL INFORMATION PROTECTION POLICY

Introduction

StarDyne Group Companies are committed to providing clients with exceptional service. While we have always respected our clients' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of applicable privacy legislation which sets out the ground rules for how businesses may collect, use and disclose personal information.

StarDyne Group Companies will inform our clients, and employees of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy, developed in compliance with applicable privacy legislation, outlines the principles and practices we will follow in protecting employees, clients and clients' customers' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of the personal information of our employees, clients and clients' customers.

Personal Information – Collection and Use

As a policy matter we do not gather **personal information of our clients**. The information we do gather is business contact information on client contacts which is used for business purposes only. This information does not generally fall under the definition of personal information protected by Privacy Legislation. The purposes for which the business contact information of clients is collected may include, but is not limited to:

- communicating with clients
[to deliver newsletters]
- establishing and maintaining commercial relations
[to prepare a request for proposal, to perform product demonstrations]
- developing, marketing or providing products and services
[to develop and test customizations, to perform data conversions]
- conducting market research and surveys
[to complete client surveys]
- complying with legal and regulatory obligations

We are in the business of helping our clients manage information about their operations and their customers. **Information about our clients' customers** is used for implementing their information systems or providing support services. We are willing to confirm to our clients that this is the only use for which the information delivered to us will be utilized.

If using personal information for other than the above purposes we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

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Personal Information – Consent

Your knowledge and consent to our collection and use of Personal Information is important. We rely on your actions as indications of your consent to our information practices in addition to obtaining consent as follows:

- An employee collecting personal information on behalf of the Company will obtain client or employee consent to collect, use or disclose personal information (except, as noted below, where we are authorized to do so without consent).
- Consent can be provided orally, in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose.
- Specific written consent will be obtained as part of the normal contractual arrangements with clients and clients' customers.
- We will record the consent received (e.g. note to file, copy of e-mail, copy of check-off box, etc.)
- Generally, the use of products and services by a customer constitutes implied consent for the company to collect, use and disclose personal information for identified purposes.
- An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The company will inform individuals of the implications of withdrawing consent.
- All employees collecting personal information will be able to answer an individual's questions about the purposes of the collection.
- We may collect, use or disclose personal information without the client's or employee's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health or personal security
 - When the personal information is available from a public source [telephone directory]
 - To protect ourselves from fraud
 - To investigate an anticipated breach of an agreement or a contravention of law

Personal Information – Limit Collection, Use, Disclosure and Retention

Access to **Information about our clients' customers** will be limited to those that work with the information to provide the services requested by the client. All personal information about our clients' customers will be destroyed, erased or rendered anonymous within six months of when the Personal Information is no longer required.

Except where required or authorized by law, when Personal Information is no longer required for the purposes for which it has been collected, such Personal Information will be made anonymous or destroyed as defined above.

When the company proposes to use personal information that has been collected for a purpose not previously identified, it will identify the new purpose before using such personal information. Unless the new purpose is required by law, or consent is otherwise not required pursuant to privacy legislation, the consent of the individual shall be obtained before the personal information is used for the new purpose.

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Personal Information – Accuracy and Safeguards

Personal information about clients' customers shall be updated only as and when necessary to fulfill the identified purposes or upon notification by the individual.

All Personal information will be treated as private and confidential and will be protected by security safeguards appropriate to the sensitivity of the information. Personal information about clients' customers maintained on computer systems will be protected by passwords, and access will be limited to those that work with the information to provide the services requested by the client. All Personal information about Canadian clients' customers will not be transmitted, stored or accessed outside of Canada.

Personal Information – Access

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. Upon request, we will inform the requesting party how we use their personal information and to whom it has been disclosed if applicable.

All enquiries regarding this policy should be sent directly to **STARDYNE TECHNOLOGIES** attention Privacy Office or email to privacy@stardynetech.com attention Privacy Office.