



## Stratacon's Commitment to Privacy and Security

We respect and protect your privacy. If you have privacy questions or concerns, please contact Stratacon at the number or mailing address listed on the website.

### *Introduction*

Stratacon Inc. ("Stratacon") is committed to keeping personal information accurate, confidential, secure and private. The Stratacon Privacy Code is an embodiment of this commitment and applies to Stratacon and its subsidiaries. This Privacy Code is based on the Personal Information Protection and Electronic Documents Act (PIPEDA), and the Alberta Personal Information Protection Act (PIPA), and on the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information (CAN/CSA-Q830-96). A copy of the PIPEDA is available at [www.privcom.gc.ca](http://www.privcom.gc.ca).

This Privacy Code describes the principles Stratacon will use to protect the privacy of personal information in its possession or control. In order to ensure that this Privacy Code is kept up to date, we reserve the right to change this Privacy Code from time to time. Any changes will be effective 30 days following Stratacon providing you with notice. Notice of changes to the Privacy Code may be distributed through statements, newsletters and/or posted on the Stratacon web site. If you access your account after the effective date of the change, you automatically accept the change.

### *Definition Of Terms Used In This Privacy Code*

#### *Personal Information*

Information about an identifiable individual, but does not include the name, title or business address or business telephone number of an employee of an organization.

#### *Privacy Officer*

The person at Stratacon who is responsible for ensuring the protection of individuals' personal information. The Privacy Officer may be contacted by mail at the address listed on the website.

### *Stratacon's Accountability*

Stratacon is accountable for all personal information in its possession or control. Stratacon has designated one or more persons to be accountable for compliance. Senior management of Stratacon will have ultimate accountability for protecting personal information. Senior management has delegated the day-to-day management of procedures involving personal information protection to one or more persons.

Stratacon's Privacy Officer is responsible for overall personal information protection and Stratacon's compliance with this Privacy Code. Stratacon will allow the following categories of Stratacon employees to access individuals' personal information:

- Sales and Service Personnel;
- Marketing Personnel;
- Security Personnel;
- Audit Personnel;

- IT Personnel;
- Operations Personnel;
- Legal Personnel.

Human Resources Personnel will have access to information about Stratacon employees.

#### *Identifying The Purposes of Collecting Personal Information*

Stratacon will identify the purposes of collecting personal information, before or when consent is provided. Except as noted below, when an individual or business requests a product or service, Stratacon will make the individual aware of the purposes for which Stratacon is requesting the personal information. If Stratacon identifies other purposes for which the personal information may be used, Stratacon will seek the individual's consent prior to starting these uses. Stratacon will explain that it is the individual's right to refuse permission for Stratacon to use personal information for any such other purposes.

Stratacon will clearly identify the purposes for which it is collecting personal information in writing, verbally (either in person or over the telephone), or by any other means it communicates with individuals.

Individuals can ask for information about the purposes for which Stratacon collects personal information when they phone or visit Stratacon, or write to the Privacy Officer.

Unless additional purposes are identified to an individual before or at the time of collection, Stratacon will collect information for the following purposes:

- To help identify new clients;
- to determine the suitability of products or services or the eligibility of an individual or business for products and services;
- to set up and manage products and services that meet an individual's needs;
- to offer products and services to meet those needs;
- to provide ongoing service; and
- to meet legal and regulatory requirements.

Stratacon takes care to explain purposes, which are not as obvious as others. The purposes for collecting a name or address are obvious and do not need to be explained, but the purposes for collecting other information may not be as self-evident.

Stratacon may collect, disclose and use personal information for some or all of the following purposes:

- references are used to verify information on an application;
- personal information is used by Stratacon to determine eligibility for products and to notify the clients of such products by website, mail, e-mail or phone;
- information may be collected and used to investigate specific patterns for the purpose of detecting unauthorized or illegal activities; and
- Personal information is used to establish your identification and protect you and Stratacon from error and fraud.
- To aid in collection of outstanding or delinquent accounts.

#### *Obtaining Consent*

Stratacon will obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly, implicitly or through an authorized representative.

Stratacon will collect, use or disclose personal information without an individual's consent only in limited circumstances as permitted, or required by law.

Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time.

Stratacon will obtain consent before or when it collects, uses or discloses personal information. Generally, Stratacon will seek consent to use and disclose personal information at the same time it collects the information. In some circumstances, Stratacon may identify a new purpose and seek consent to use and disclose personal information after it has been collected. Stratacon will explain to individuals in plain language how personal information will be used or disclosed before they give their consent.

Consent to the collection, use and disclosure of personal information can be expressed, implied, or given through an authorized representative of the individual. Individuals can express consent verbally, such as when information is collected over the telephone, in writing, such as when completing and signing an application or electronically, such as when applying through a computer. Individuals can imply their consent, for example, by using a Stratacon product or service. In such a case, Stratacon may assume that the individual consents to the use of the personal information.

Stratacon may collect, use or disclose personal information without the individual's knowledge and consent only in limited circumstances as permitted by law.

- Stratacon may collect, use and disclose personal information without the individual's knowledge or consent if it is clearly in the individual's best interests to do so and consent can not be sought in a timely manner. An example of such a circumstance is when an individual is seriously ill.
- Stratacon may collect, use and disclose personal information without individuals' knowledge or consent in certain circumstances where the information is publicly available. An example would be the name, address and phone number of a subscriber to a telephone directory that is available to the public where the subscriber can refuse to have their personal information appear in the telephone directory.

Subject to certain legal or contractual restrictions and reasonable notice, an individual may refuse or withdraw consent at any time. Refusing or withdrawing consent for Stratacon to collect, use or disclose personal information could mean that Stratacon cannot provide the individual with a product, service or information of value to the individual. Stratacon, however, will not unreasonably withhold products, services or information from individuals who refuse to give consent or who withdraw consent.

Stratacon is required by law to collect certain types of personal information in order to verify the identity of its clients. If an individual does not allow Stratacon to collect and use this information, or if the client later attempts to withdraw their consent, Stratacon may not be able to open an account or maintain the account on behalf of that client.

#### *Limits On The Collection Of Personal Information*

Stratacon limits the amount and type of personal information it collects. Stratacon will collect personal information only for purposes it has already identified to the individual or as permitted by law. Stratacon will collect personal information using procedures which are fair and lawful. Stratacon will collect only the amount and type of information needed for the purposes documented by Stratacon and identified to the individual.

Stratacon will collect personal information about an individual primarily from that individual. Except as permitted by law, Stratacon will only collect personal information from external sources if individuals have consented to such collection.

#### *Limits On Using, Disclosing And Keeping Personal Information*

Stratacon will use or disclose personal information only for the reasons it was collected, unless consent is given to use or disclose it for another reason. Under certain exceptional circumstances, Stratacon may have a legal duty or right to disclose personal information without the individual's knowledge or consent. Stratacon will keep personal information only as long as necessary for the identified purposes.

Stratacon may disclose personal information without consent when required or permitted by law. Examples of such disclosure include:

- Subpoenas, search warrants and other court and government orders; and
- disclosure of personal information to a lawyer (or, in Quebec, a notary or an advocate) who represents Stratacon.

In any of the circumstances referred to in Principle 5.1, Stratacon will protect the interests of its clients by making sure that:

- orders or demands appear to comply with the laws under which they were issued, and
- Stratacon does not comply with casual requests for personal information from government or law enforcement authorities.

Stratacon may notify individuals that an order or demand has been received, if the law does not prohibit such notification. Stratacon may notify individuals by telephone, or by letter to the client's known address.

Stratacon may want to use personal information in its possession or control to market products and services to individuals, either directly through Stratacon or through its subsidiaries or affiliates.

When an individual or business applies for a product or service and provides information, Stratacon may use this information to market other Stratacon products and services to the individual.

#### *Keeping Personal Information Accurate*

Stratacon will keep the personal information in its possession or control accurate, complete, current and relevant, based on the most recent information available to Stratacon. Individuals may challenge the accuracy and completeness of personal information about them and have it amended as appropriate.

Stratacon will also rely on individuals to keep certain personal information relating to them accurate, complete and current. If an individual demonstrates to Stratacon that personal information relating to them is inaccurate, incomplete, out of date or irrelevant, Stratacon will revise or delete the personal information. If necessary, Stratacon will disclose the revised personal information to any third parties to whom Stratacon disclosed wrong or outdated information in order to permit them to revise their records.

### *Safeguarding Personal Information*

Stratacon will protect personal information with safeguards appropriate to the sensitivity of the information. Stratacon will safeguard personal information in its possession or control from loss or theft and from unauthorized access, disclosure, duplication, use or modification.

The safeguards employed by Stratacon to protect personal information will vary depending on the sensitivity, amount, distribution, format and storage of the personal information. Stratacon stores most of your information electronically. Stratacon will give the highest level of protection to the most sensitive personal information.

Stratacon will safeguard personal information in its possession or control through security measures. For example:

- physical security, such as secure locks on filing cabinets and restricted access to offices;
- organizational security, such as controlled entry in data centres and limited access to relevant information; and
- electronic security, such as passwords, personal identification numbers and encryption.

Stratacon will inform employees regularly about Stratacon policies and procedures for protecting personal information and will emphasize the importance of complying with them. As a condition of employment, employees will be required to conform to Stratacon's personal information policies and procedures.

Stratacon may transfer personal information to third parties for processing, including data processing services, and collection. Stratacon will require these third parties to safeguard all personal information in a way that is consistent with Stratacon measures and/or as regulated by law.

Stratacon will use care when disposing of or destroying personal information in order to prevent unauthorized access to the information.

### *Making Information About Policies And Procedures Available To Individuals*

Stratacon will be open about the procedures used to manage personal information. Individuals will have access to information about these procedures through Stratacon's web site. The information will be available in a format that is easy to understand.

### *Access To Personal Information*

When an individual requests it, Stratacon will advise what personal information Stratacon has in its possession or control about the individual, what it is being used for and to whom it has been disclosed. When an individual requests it, Stratacon will give the individual access to personal information about them which is in the possession or control of Stratacon. In certain exceptional situations, Stratacon may not be able to give individuals access to all of the personal information

about them. In some cases, Stratacon may not provide access to personal information that is in its possession or control. This may occur when:

- providing access to personal information would be likely to reveal personal information about a third party;
- providing the personal information could result in a threat to the security of another individual;
- disclosing the information would reveal confidential commercial information;
- the personal information is protected by solicitor-client privilege;
- the information is the result of arbitration or other formal dispute resolution process; or
- the information has been collected for the purposes of a legal investigation.

If Stratacon denies the individual's request for access to personal information, Stratacon will advise the individual of the reason for the refusal. The individual may then challenge Stratacon's decision.