

## Website Privacy Policy

### Access Point Information Canada Ltd. ("Access Point")

This Policy applies to the gathering and dissemination of personal information via Access Point's website located at [www.estratahub.com](http://www.estratahub.com) (the "Website"). By using the Website, you are consenting to the terms and conditions set forth in this Policy, including without limitation the collection, use and disclosure of your personal information by Access Point as outlined in this Policy. IF THIS POLICY IS NOT ACCEPTABLE TO YOU, DO NOT SUBMIT ANY OF YOUR PERSONAL INFORMATION. We may update this Policy from time to time and you are responsible for periodically reviewing the most current version of this Policy on the Website. Following any such update, your continued use of the Website or any subsequent submission by you of personal information will be deemed your conclusive acceptance of the updated Policy.

### OUR COMMITMENT

We are committed to protecting personal information in our care. We are committed to maintaining integrity and trust through this Policy and through our compliance with British Columbia's Personal Information Protection Act (the "Act") and all other applicable privacy laws, such as Canada's Information Protection and Electronic Documents Act ("PIPEDA"), if applicable.

### RESPONSIBILITY

We are responsible for all personal information under our control, even if it is not in our possession. We have developed policies and procedures to deal with the proper collection, use and disclosure of personal information. We have appointed the following person to answer any questions or to handle requests for access to personal information or complaints:

Name	Contact Information
Bob Dearborn	<a href="mailto:eStrataHubAdmin@eStrataHub.com">eStrataHubAdmin@eStrataHub.com</a>

### ELECTRONIC PERSONAL INFORMATION

We take all reasonable precautions to ensure that this Policy applies to personal information, collected, used or disclosed on the Website. We operate secure data networks protected by industry standard firewalls and password protection systems to ensure such personal information is kept safe from loss, unauthorized access, modification or disclosure. However, individuals should consider that no information transmission over the Internet is completely secure.

An individual providing us with an email address electronically through the Website is considered to have consented to our use, disclosure and collection of his/her personal information in strict accordance with this Policy.

We may use cookies on the Website. "Cookies" are small text files that recognize repeat visitors and track their visits to the Website. Specific browser manufacturers or providers should be consulted with respect to disabling cookies.

We may use clear gifs. "Clear gifs" are used to track the pages visited on the Website to help us improve the design and content of the Website. All of this information is considered confidential and is only available for our use.

We may monitor traffic patterns, Website usage and related Website information in order to optimize the Website.

The Website may contain links to third party sites, as well as other sites of our affiliates and subsidiaries. We are not responsible for the privacy policies of any third party sites and the

privacy policies of our affiliates and subsidiaries may differ from this Policy. Visitors are encouraged to read the privacy policies posted on the third party sites, as well as those posted on the sites of our affiliates and subsidiaries.

## **CONSENT**

We cannot collect, use, or disclose the personal information of an individual without the appropriate form of informed consent from that individual. Where the personal information is sensitive in nature, we will provide the individual in question with a clear written, oral or electronic description of our reason for collecting, using, or disclosing the information. We will not collect, use, or disclose the information until we have obtained written consent to do so from that individual. Where the personal information is not sensitive in nature and the purpose for our collection, use, or disclosure would be clear to a reasonable person, an individual will be deemed to consent to our collection, use, or disclosure of the information when the individual provides that information to us freely.

Unless required by law or otherwise authorized by the Act, or all other applicable privacy laws, we will not use or disclose personal information already collected for other purposes unless we obtain the consent of the individual to whom it belongs. Generally, we will seek consent to use and disclose personal information at the same time as we collect the information.

Subject to contractual or legal arrangements, individuals may withdraw or refuse consent provided that we are given reasonable notice. We will inform the individual of the consequences of withdrawing his/her consent, if any.

## **COLLECTION**

We will only collect personal information for the specific purposes that we have identified and that are reasonable in the circumstances. We will try to collect personal information directly from the individual concerned unless authorized by that individual to collect it from a third party or otherwise as permitted by the Act.

## **USE, DISCLOSURE AND RETENTION**

We will only use or disclose personal information for the specific purpose(s) for which it was collected. We may disclose the personal information:

- a. to a person who in our reasonable judgment is seeking the information as an agent of the individual;
- b. to a company or individual engaged by us, to perform functions on our behalf, such as research or data processing, or for the development, enhancement, marketing or provision of any of our products or services;
- c. to a credit reporting agency;
- d. to another entity as part of a merger, a sale of assets or all or part of a business, or any other corporate change or re-organization;
- e. to a public authority or agent of a public authority, if in our reasonable judgement, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
- f. when such use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- g. where the individual concerned consents to such use or disclosure;
- h. when such use or disclosure is required or authorized by law;
- i. when it is reasonable to expect that the use or disclosure with the consent of the individual would compromise the availability or the accuracy of the personal information and the collection, use or disclosure is reasonable for an investigation or a proceeding; and
- j. when we require legal advice from a lawyer.

We will retain personal information only as long as necessary to fulfill the purposes stated above, as required for legal or business purposes or as required by law. Subsequently, we will destroy, erase, or make anonymous such information. However, we will retain, for at least one year, personal information that has been used to make a decision about a client, customer or employee.

### **ACCURACY OF PERSONAL INFORMATION**

We will make reasonable efforts to ensure that personal information in our control is accurate and complete. Individuals may request corrections to their personal information. If we reject an individual's request for a correction, we will make a notation of such request and rejection on the individual's file or personal information.

### **SAFEGUARDING PERSONAL INFORMATION**

We will protect personal information in our control against loss, destruction or theft and against unauthorized access, disclosure, copying, use or modification. We use security safeguards that are appropriate to the sensitivity and format of the personal information in question.

### **ACCESS**

Upon reasonable written notice from an individual, we will, within 30 days or such period required or authorized by law, provide the individual with access to his/her personal information in our control and tell the individual what the information is being used for and to whom it has been disclosed.

We reserve the right to charge a reasonable fee for providing such access to personal information.

In certain situations, we may not be able to provide access to all personal information about an individual under our control. For example, we may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of an individual. Also, we may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a law.

If we refuse an individual's request for access, we will notify the individual in writing and will document the reasons for refusal, the relevant provision of the Act on which we rely and the remedies available to the individual.

### **COMPLAINTS**

An individual who has complaints about how his/her personal information is being handled by us may file a written complaint with our designated representative at the contact address listed above. Such complaint must clearly state the nature of the dispute and contain all necessary contact information for the complainant.

We will acknowledge receipt of a complaint, investigate such complaint and notify the complainant of the outcome of the complaint, including any relevant steps taken.

If a complaint has not been resolved to the satisfaction of an individual, he/she may seek redress from the Office of the British Columbia Information and Privacy Commissioner.