

W.O. STINSON & SON LTD.

Policy On The Collection, Use and Disclosure Of Personal Information

"PRIVACY POLICY"

By providing us with Personal Information, you agree and consent that we may collect, use and disclose your Personal Information in accordance with this Privacy Policy. If you do not agree with these terms, you are requested not to provide us any Personal Information. Unfortunately, certain services can only be offered if you provide Personal Information. Consequently, if you choose not to provide us with any required Personal Information, we may not be able to offer you those services.

1. Objective & Scope of Policy

W.O. Stinson & Son Ltd. is committed to respecting your privacy and we have prepared this Policy Statement to inform you of our policy and practices concerning the collection, use and disclosure of Personal Information.

This Policy Statement governs Personal Information collected from and about individuals who are or may become Clients of W.O. Stinson & Son Ltd. and those other third parties with whom we work with or who may provide us with Personal Information. This policy does not cover business contact information, corporate information or aggregated data from which the identity of an individual cannot be determined. We retain the right to use aggregated data in any way that we determine is appropriate.

In the event of questions about: (i) access to your Personal Information; (ii) our collection, use, management or disclosure of Personal Information; or (iii) this Policy Statement; please contact our head office 613-822-7400.

2. What is Personal Information?

Personal Information means any information, recorded in any form, about an identified individual, or an individual whose identity may be inferred or determined from such information. However, Personal Information does not include business contact information, such as name, position or title, business address, business phone numbers, business fax number or business e-mail address.

3. Why We Collect Your Personal Information?

We use Personal Information provided to us verbally or in writing in order to:

- Establish credit accounts for clients;
- Process orders;
- Provide products and services to clients;
- Where necessary, collect amounts outstanding from clients; Manage our relationship with clients;
- Respond to requests for information;
- Meet any legal or regulatory requirement; and
- Such other purposes consistent with the foregoing.

Our use of Personal Information is limited to these purposes. Unless permitted by law, no personal information is collected, without first obtaining the consent of the individual to the collection, use and dissemination of that information. Personal Information is collected, to the extent possible, directly from the individual concerned. However, W.O. Stinson & Son Ltd. may collect and use personal information from external sources, including references you have

provided, credit bureaus and other groups or companies where collection is necessary for the purposes described above.

4. With Whom Your Personal Information May Be Shared?

We may disclose your Personal Information to organizations or individuals that perform services on our behalf. Using contractual or other arrangements, we ensure that agents, contractors or third party service providers, who may receive Personal Information in the course of providing services to us, agree to use and hold such information solely for the purposes indicated by us.

If you apply for credit with W.O. Stinson & Son Ltd. any Personal Information you provide may also be disclosed and shared with credit reporting agencies, credit bureaus or to any person or corporation with whom you have or propose to have financial relations.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where we are obliged to disclose information without consent. Such circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or other governmental tribunal;
- Where we believe, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect monies owing to W.O. Stinson & Son Ltd.;
- Where it is necessary to permit us to pursue available remedies or limit any damages that W.O. Stinson & Son Ltd. may sustain; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, we will not disclose more information than is required.

5. Accuracy of Your Personal Information

We endeavor to ensure that any personal information provided and in our possession is as accurate, current and complete as necessary for the purposes for which we use that information. We rely on our clients to keep their personal information accurate, complete and up to date. If we become aware that personal information is inaccurate, incomplete or out of date we will revise the personal information and, if necessary, use our best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.

6. How Long We Retain Your Personal Information?

We keep personal information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the product or service and the nature of the information. This period may extend beyond the end of your relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date. When personal information is no longer required for our purposes, we will destroy, delete, erase or convert it into an anonymous form.

7. How We Protect Your Personal Information?

We endeavor to maintain adequate physical, procedural and technical security with respect to our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information.

We further protect Personal Information by restricting access to it to those employees that the management of W.O. Stinson & Son Ltd. has determined need to know that information in order that we may provide our services.

If an employee misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses personal information - provided for the purpose of providing services to or for W.O. Stinson & Son Ltd.- this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between W.O. Stinson & Son Ltd. and that individual or organization.

W.O. Stinson & Son Ltd. permits the reasonable right of access and review of Personal Information held by us about an individual.

8. Access to Your Personal Information

If an individual believes any Personal Information concerning him or her is not correct, that person may request an update of that information by sending a request to the person indicated in Section 1 of this Policy. We reserve the right not to change any Personal Information but will append any alternative text the individual concerned believes appropriate.

We reserve the right to decline access to Personal Information where the information requested:

- a) Would disclose (i) personal information, including opinions, about another individual or about a deceased individual; or (ii) trade secrets or other business confidential information that may harm W.O. Stinson & Son Ltd. or the competitive position of a third party or interfere with contractual or other negotiations of W.O. Stinson & Son Ltd. or
- b) A third party;
- c) Is subject to solicitor-client or litigation privilege;
Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or
- d) Value of the information;
- e) Does not exist, is not held, or cannot be found;
Could reasonably result in (i) serious harm to the treatment or recovery of the individual concerned, (ii) serious emotional harm to the individual or another individual, or (iii) serious bodily harm to another individual;
- f) May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions; or
- g) Any other grounds under applicable legislation.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

Where information will be disclosed, we will endeavor to provide the information in question within a reasonable time.

We will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, we will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information.

To guard against fraudulent requests for access, we will require sufficient information to allow us to confirm the identity of the person making the request before granting access or making corrections.

9. Amendment of Our Practices and This Policy

This statement is in effect as of January 14, 2006. We will from time to time review and revise our privacy practices and this Policy Statement. In the event of any amendment, an appropriate notice will be communicated to clients and others in an appropriate manner. Policy changes will apply to the information collected from the date of the revised Policy Statement as well as to existing information held by W.O. Stinson & Son Ltd.