

PRIVACY POLICY - QUADRUS DEVELOPMENT INC.

Introduction

Quadrus is committed to providing exemplary professional services and to establishing and maintaining responsible and ethical relationships. Privacy and the protection of personal information in our possession are cornerstones of Quadrus relationships. This document sets out Quadrus' primary privacy policy (the "Policy") and illustrates our commitment to comply with applicable privacy legislation.

Scope and Application

This Policy applies to Quadrus' collection, use and disclosure of Personal Information and other privacy obligations.

Activities involving the collection, use and disclosure of Personal Information by Quadrus are conducted in Alberta, Canada and therefore Quadrus is subject to the exclusive application of one or both of relevant Alberta provincial privacy legislation and Canadian federal privacy legislation, depending on the circumstances. By providing or consenting to the provision by others of an individual's Personal Information to Quadrus the individual consents to and accepts the exclusive application of one or both of relevant Alberta provincial privacy legislation and Canadian federal privacy legislation to the Personal Information, depending on the circumstances.

Definitions

Throughout this Policy the following words and phrases shall have the following meanings:

Business Contact Information – means an individual's name, position names or titles, business telephone numbers, business addresses, business emails, business faxes and other similar business information that is used by Quadrus for the purpose of contacting that individual in that individual's capacity as an Employee or official of an organization.

Employee – means an individual employed by an organization and includes an individual who performs a service for or in relation to or in connection with an organization as an apprentice, volunteer, participant or student, or under a contract or an agency relationship with the organization.

Personal Employee Information – means in respect of an individual who is an Employee or a potential Employee, personal information reasonably required by an organization that is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer relationship between the organization and the individual.

Personal Information – means information about an identifiable individual but does not mean the Business Contact Information of that individual.

Privacy Principles

Quadrus embraces and our Policy is substantially expressed through, the following ten privacy principles (collectively the “Principles”):

ACCOUNTABILITY
IDENTIFYING AND PROVIDING NOTICE OF PURPOSE
CONSENT
LIMITING COLLECTION
LIMITING USE, DISCLOSURE AND RETENTION
ACCURACY
SAFEGUARDS
OPENNESS
INDIVIDUAL ACCESS
CHALLENGING COMPLIANCE

1. Accountability

1.1 Quadrus is responsible for the Personal Information in its custody or under its control and has developed and follows policies and practices that are reasonable for Quadrus to meet its obligations under applicable privacy legislation including:

1.1.1 we have reviewed and will continue to conduct ongoing reviews of our Personal Information holdings and handling

practices for compliance with the Principles and applicable privacy legislation;

- 1.1.2 we have developed and implemented privacy policies and procedures, including this Policy, in relation to the Principles and applicable privacy legislation;
 - 1.1.3 we inform Quadrus staff of and train Quadrus staff on relevant Quadrus privacy policies and practices;
 - 1.1.4 we publish this Policy on our website and make relevant information about other Quadrus privacy policies and practices available on request.
- 1.2 Quadrus has appointed a designated individual as its Privacy Officer immediately responsible for compliance with this Policy.
 - 1.3 Quadrus shall identify the Privacy Officer upon request where required by this Policy or applicable privacy legislation.

2. Identifying and Providing Notice of Purpose

- 2.1 Quadrus shall identify and document the purposes for which Personal Information is collected, where required by applicable privacy legislation.
- 2.2 When Personal Information collected by Quadrus is to be used for a purpose not previously identified, the new purpose shall be identified and documented by Quadrus, where required by applicable legislation.
- 2.3 Before or at the time Quadrus collects Personal Information from an individual or organization, Quadrus shall notify that individual verbally or in writing of the purpose for which such Personal Information is collected and the Quadrus point of contact to field questions from that individual about such collection, unless such notice is not required or permitted not to be provided by applicable privacy legislation.

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- 2.4 Before or at the time Quadrus collects Personal Information about an individual from an organization (for which obtaining consent to such collection is required by applicable privacy legislation) Quadrus shall notify that organization of the consent of that individual to the collection of such Personal Information.
 - 2.5 Before or at the time Quadrus collects Personal Information about an individual from an organization (for which obtaining consent to such collection is not required by applicable privacy legislation) Quadrus shall, where required by applicable privacy legislation, provide sufficient notification to that organization of the purpose for such collection so as to allow such organization to make a determination on whether disclosing such Personal Information would be in compliance with applicable privacy legislation.
 - 2.6 Before or at the time Quadrus collects Personal Employee Information from a Quadrus Employee for purposes related to the employment relationship with Quadrus, Quadrus shall notify that individual of the collection of and purpose for which such Personal Information is collected, unless such notice is not required or permitted not to be provided by applicable privacy legislation.
 - 2.7 Examples of Personal Information collected by Quadrus includes:
 - 2.7.1 names and contact information of individuals who contact Quadrus in a capacity other than a commercial capacity (for example, when an individual out of a personal interest requests that Quadrus provides the individual with information technology material that Quadrus might elect to make publicly available);
 - 2.7.2 information on the educational background and business or information technology related skills and experience of individuals and representatives of entities with whom or which Quadrus has or is pursuing a business relationship ("Quadrus Contacts");

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- 2.7.3 Business Contact Information of a Quadrus Contact used by Quadrus other than solely for the purpose of contacting the Quadrus Contact in the capacity as an Employee of an organization (for example, when a Quadrus Contact out of a personal interest requests that Quadrus provides the Quadrus Contact with information on Quadrus sponsored user groups in the information technology community);
 - 2.7.4 personal preferences of Quadrus Contacts (for example, special dietary requirements or preferences of Quadrus Contacts);
 - 2.7.5 financial and credit information on Quadrus Contacts who are responsible for compensating Quadrus for products and services provided by Quadrus;
 - 2.7.6 the history of involvement of Quadrus Contacts in the provision of products and services to or by Quadrus;
 - 2.7.7 Personal Employee Information.
- 2.8 Examples of the purposes for which Personal Information collected by Quadrus is collected, used and disclosed includes:
- 2.8.1 to provide products and services offered by Quadrus;
 - 2.8.2 to develop, improve and market products and services offered by Quadrus;
 - 2.8.3 to establish, conduct and maintain a business relationship involving Quadrus;
 - 2.8.4 to learn about and understand the needs of past, current and prospective customers of Quadrus in order to develop and provide informational materials and/or meetings relating to information technology to such customers or others in the business or information technology community;

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- 2.8.5 for accounting, financial and record keeping purposes related to the business operations of Quadrus;
 - 2.8.6 to compile statistics and conduct analytics of a nature that does not personally identify an individual;
 - 2.8.7 for establishing, managing and terminating a volunteer, consulting or employment relationship with Quadrus;
 - 2.8.8 to comply with legal and regulatory obligations.

3. Consent

- 3.1 Before collecting Personal Information from an individual or a third party about that individual, Quadrus shall obtain the consent from that individual for the collection, use and disclosure of such Personal Information, unless such consent is not required or permitted not to be obtained by applicable privacy legislation.
- 3.2 Quadrus' obtaining consent to the collection, use and disclosure of Personal Information, where required by applicable privacy legislation, can be achieved by:
 - 3.2.1 obtaining the written or oral or (where permitted under applicable privacy legislation) implied consent of the individual from or in respect of whom such Personal Information is being collected; or
 - 3.2.2 providing an individual, where permitted by applicable privacy legislation, with reasonably understandable notice that Quadrus intends to collect, use and disclose Personal Information about that individual for a particular purpose and:
 - 3.2.2.1 giving that individual a reasonable opportunity to decline or object to such collection, use or disclosure;
 - 3.2.2.2 not receiving within a reasonable time, a response from that individual declining or objecting to such collection, use or disclosure; and

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- 3.2.2.3 having regard to the level of sensitivity of such Personal Information, if any, it is reasonable for Quadrus to collect, use and disclosure such Personal Information for the particular purpose.
- 3.3 Consent to the collection, use and disclosure of Personal Information is deemed and thus not required to be obtained by Quadrus, where:
- 3.3.1 an individual voluntarily provides Personal Information to Quadrus for a particular purpose;
 - 3.3.2 it is reasonable that such individual would voluntarily provide such Personal Information to Quadrus for that purpose; and
 - 3.3.3 applicable privacy legislation deems such circumstances to constitute consent.
- 3.4 Where consent is required for the collection, use and disclosure of Personal Information, an individual may withdraw or vary such consent on giving Quadrus with reasonable notice of such withdrawal or variation and Quadrus shall:
- 3.4.1 advise such individual of the consequences of such withdrawal or variation unless reasonably obvious; and
 - 3.4.2 except to the extent such withdrawal or variation would frustrate the performance of a legal obligation between Quadrus and a party to such legal obligation:
 - 3.4.2.1 in the case of a withdrawal of consent, stop collecting, using or disclosing such Personal Information; and
 - 3.4.2.2 in the case of a variation of consent, abide by such variation or stop collecting, using or disclosing such Personal Information.

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- 3.5 Quadrus shall not, as a condition of supplying our products or services, require an individual to consent to the collection, use or disclosure of Personal Information beyond what is necessary to provide those products or services.
- 3.6 Quadrus shall not obtain or attempt to obtain consent for the collection, use or disclosure of Personal Information by providing false or misleading information or using deceptive or misleading practices.
- 3.7 There are certain circumstances identified by applicable privacy legislation in which Quadrus is not required or permitted not to obtain consent for the collection, use or disclosure of Personal Information. By way of example only, Quadrus is not required to obtain consent to the collection, use or disclosure of Personal Information where:
- 3.7.1 the collection of Personal Information is required by applicable legislation;
 - 3.7.2 the collection of Personal Information is from a public body that is authorized or required by applicable legislation to disclose the Personal Information to Quadrus;
 - 3.7.3 the Personal Information is publicly available;
 - 3.7.4 a reasonable person would consider that the collection of the Personal Information is clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent; or
 - 3.7.5 the Personal Information is Personal Employee Information.
- 3.8 Quadrus may collect, use and disclosure Personal Employee Information about an individual without that individual's consent where:
- 3.8.1 the individual is an Employee of Quadrus or the collection of Personal Employee Information is for the purpose of recruiting a potential Employee;

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- 3.8.2 the collection is reasonable for the purposes for which the Personal Employee Information is collected;
 - 3.8.3 the Personal Employee Information consists only of Personal Information that is related to the employment or volunteer work relationship of the individual; and
 - 3.8.4 in the case of an Employee, Quadrus has prior to such collection provided the Employee with reasonable notification that the Personal Employee Information is going to be collected and the purposes for which the Personal Employee Information is going to be collected.

4. Limiting Collection

- 4.1 Quadrus shall collect Personal Information only for purposes that are reasonable and only to the extent that is reasonable for meeting the purposes for which the Personal Information is collected, unless otherwise required or permitted by applicable privacy legislation.

5. Limiting Use, Disclosure and Retention

- 5.1 Quadrus shall use and disclose Personal Information only for purposes that are reasonable and only to the extent that is reasonable for meeting the purposes for which the Personal Information is used or disclosed, unless otherwise required or permitted by applicable privacy legislation.
- 5.2 Quadrus may retain Personal Information for legal or business purposes only for as long as is reasonable, unless otherwise required or permitted by applicable privacy legislation.
- 5.3 Quadrus shall destroy, erase, write-over or make anonymous Personal Information which it is no longer permitted to retain by applicable privacy legislation.

6. Accuracy

- 6.1 Quadrus shall make reasonable efforts toward ensuring that Personal Information collected, used or disclosed by or on behalf of Quadrus is accurate and complete, unless otherwise required or permitted by applicable privacy legislation.

7. Safeguards

- 7.1 Quadrus shall protect Personal Information in Quadrus' custody or control by making reasonable security arrangements respecting the Personal Information appropriate to the sensitivity of the Personal Information.
- 7.2 Security arrangements that Quadrus may take, as appropriate, include:
- 7.2.1 physical arrangements such as locking and restricted access to areas containing Personal Information and shredding applicable Personal Information on disposal;
 - 7.2.2 administrative arrangements such as training Quadrus staff about the protection of and confidentiality obligations related to Personal Information; and
 - 7.2.3 technical arrangements such as using firewalls and anti-virus programs on computers, using screensavers on computers, using password protection and access restriction protocols, using encryption technology and eliminating Personal Information on disposed computers.

8. Openness

- 8.1 Quadrus shall publish this Policy on its website and shall make relevant information about other Quadrus privacy policies and practices available on request.

9. Individual Access

- 9.1 Upon receipt of an appropriate written request from an individual for access to, copies of, or the right to examine a record containing, Personal Information about the individual, Quadrus shall, after taking into consideration what is reasonable, provide that individual with:
- 9.1.1 reasonable assistance with the individual's request;
 - 9.1.2 information of a logistical nature respecting Quadrus' response to the individual's request, as required by applicable privacy legislation;
 - 9.1.3 access to the individual's Personal Information that is contained in a record under the custody or control of Quadrus, unless refusal to provide such access is required or permitted by applicable privacy legislation (the "Accessible Personal Information");
 - 9.1.4 the purposes for which Accessible Personal Information has been used and is being used by Quadrus;
 - 9.1.5 the names of the persons to whom and circumstances in which the Accessible Personal Information has been and is being disclosed;
 - 9.1.6 where requested by the individual, a copy of the Accessible Personal Information or a copy of or right to examine the record or parts of the record containing the Accessible Personal Information;
 - 9.1.7 a record created by Quadrus in respect of the individual's request and Accessible Personal Information, unless not required or permitted not to by applicable privacy legislation; and
 - 9.1.8 information on the individual's right to request a review of Quadrus' response by a legislatively appointed privacy

commissioner, where permitted by applicable privacy legislation.

9.2 There are certain circumstances identified by applicable privacy legislation in which Quadrus is not required or permitted not to provide an individual with access to, copies of, or the right to examine a record containing, the individual's Personal Information. By way of example only, Quadrus is not required to provide an individual with access to, copies of, or the right to examine a record containing, the individual's Personal Information where:

9.2.1 the Personal Information is protected by legal privilege;

9.2.2 the disclosure of the Personal Information would reveal confidential commercial information and Quadrus is not reasonably able to sever the Personal Information from the confidential commercial information;

9.2.3 the Personal Information was collected for an investigation or legal proceeding;

9.2.4 the disclosure of the Personal Information could reasonably be expected to threaten the life or security of another individual and Quadrus is not reasonably able to sever the Personal Information from the possibility of such threat;

9.2.5 the disclosure of the Personal Information could reasonably be expected to reveal Personal Information about another individual and Quadrus is not reasonably able to sever the requested Personal Information from the other Personal Information.

9.3 In circumstances in which Quadrus is not required or permitted not to provide an individual with access to, copies of, or the right to examine a record containing, the individual's Personal Information, Quadrus shall provide the individual with a written response containing the reasons for such refusal, the provisions of applicable privacy legislation on which such refusal is based and information on the individual's right

to request a review of Quadrus' response by a legislatively appointed privacy commissioner, where permitted by applicable privacy legislation.

- 9.4 Quadrus may, where permitted by applicable privacy legislation, charge an individual requesting access to, copies or the right to examine, the Personal Information of the individual in the custody or control of Quadrus, a reasonable fee and deposit for access to, copies of or the right to examine accessible Personal Information and in such cases Quadrus shall give the individual a prior written estimate of such total fee.
- 9.5 Upon receipt of a written request from an individual to correct an error or omission in the Personal Information about the individual that is in the control of Quadrus, Quadrus shall, where there is such an error or omission:
- 9.5.1 correct the Personal Information as soon as reasonably possible or where permitted by applicable privacy legislation determine not to correct the Personal Information and annotate the Personal Information with the correction that was requested but not made; and
 - 9.5.2 send a notification containing the corrected Personal Information to each organization to which Quadrus has disclosed the Personal Information, if Quadrus is reasonably able to do so.
- 9.6 A written request by an individual to obtain access to, copies of, or the right to examine a record containing, the individual's Personal Information, or for a correction to an individual's Personal Information, must set out sufficient detail to enable Quadrus, with reasonable effort, to identify the Personal Information in respect of which such written request was made.

10. Challenging Compliance

10.1 An individual who believes that Quadrus has not complied with this Policy or applicable privacy legislation has the right to make a written complaint about the matter to Quadrus. Complaints shall be addressed to the Privacy Officer:

10.1.1 by letter to Quadrus' head office at 640 - 8th Ave SW, Suite 400, Calgary, Alberta, Canada T2P 1G7;

10.1.2 or by email to privacyofficer@quadrus.com.

10.2 Quadrus shall:

10.2.1 cause an internal investigation into a complaint to be conducted by an officer of Quadrus with appropriate authority to investigate and address the complaint, unless an investigation is not required by applicable privacy legislation;

10.2.2 respond to the complainant within a reasonable time conforming to requirements under applicable privacy legislation;

10.2.3 inform the complainant of the outcome of the investigation regarding the reviewable complaint; and

10.2.4 if a reviewable complaint is found by Quadrus to be justified, Quadrus will endeavour to take appropriate steps to resolve the complaint including, if necessary, amending this Policy or our other privacy policies and procedures.

10.3 A complaint must be in writing and provide Quadrus with full details of the circumstances of the complaint, the names of parties known to be involved, copies of relevant available documentation and reasons why the complainant believes there has been a breach of this Policy or applicable privacy legislation.

10.4 There are certain circumstances identified by applicable privacy legislation in which Quadrus is not required or permitted not to investigate a complaint by an individual. By way of example only, Quadrus is not required to investigate a complaint if:

10.4.1 the complaint is trivial, frivolous, vexatious or made in bad faith; or

10.4.2 the investigation would unreasonably interfere with Quadrus' operations because of the repetitious or systematic nature of the complaint.

10.5 An individual has the right to make a complaint to the applicable legislatively appointed privacy commissioner or ask such privacy commissioner to review a decision made by Quadrus. Individuals are encouraged to first use Quadrus' internal complaint procedure outlined in sections 10.1 – 10.3 of this Policy.

Website Use

Visitors to the Quadrus website are not required to provide Personal Information and are not personally identified. IP addresses of computers are recorded as a standard operative function of our server and related software. Quadrus may monitor traffic patterns, site usage and related site information to diagnose server problem and administer and modify our website. Links on our website to other sites shall not be governed by this Policy unless otherwise specifically stated.

When an individual voluntarily provides Quadrus with Personal Information through an email to contact information on our website:

- the individual consents to and accepts the exclusive application of one or both of relevant Alberta provincial privacy legislation and Canadian federal privacy legislation to the Personal Information, depending on the circumstances
- the consent of that individual will be deemed to the collection, use and disclosure of the Personal Information by Quadrus in accordance with this Policy.

Please note that while Quadrus implements security protocols as described in this Policy, the transmission of data over the internet by an individual to Quadrus is not secure and the individual accepts all risks associated with that transmission of Personal Information.

Policy Evolution

This Policy and other Quadrus privacy policies and procedures may evolve and change over time without advance notice, including due to changes in applicable privacy legislation. Quadrus will post changes to this Policy on our website so that individuals continue to be aware of Quadrus' commitment to protecting and utilizing Personal Information in accordance with applicable privacy legislation.