



Global Public Affairs Privacy Policy

Approved: June 2015 | Revised: September 2015

PRIVACY AT GLOBAL

Global Public Affairs (Global) recognizes the importance of protecting personal information and an individual's right to privacy.

PRIVACY LAWS AND LEGISLATION

All private information that Global obtains from any person, including clients, partners, company individuals and candidates will be accompanied by disclosure for the reason of collection, consent for its use, and a guarantee that the information will be safeguarded and only used for the purposes of original collection.

Every individual has a right to view anything written about him or her, whether that information is located in the company personnel files, or in an email, subject to the exceptions provided by law, namely that the information is prohibitively costly to provide, or it contains references to other individuals (third parties) or the information is protected or cannot be disclosed by law.

The *Personal Information Protection and Electronics Documents Act* (PIPEDA) is the Canadian Federal legislation act currently in place. Unless a province has developed its own privacy act, it is automatically governed by the PIPEDA. Privacy legislation can be compared to the *Employment Standards Act* in that a company with multiple offices across the country needs to be aware of provincial differences. At this time, Quebec, Alberta and British Columbia are the only provinces with their own privacy legislation, which are also a part of Global.

INTENT

Protecting the privacy and confidentiality of personal information is an important aspect of the way Global conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to Global's daily operations.

Global strives to protect and respect personal information of its clients, employees, business partners, and so on in accordance with all applicable regional and federal laws. Each staff member of Global must abide by this organization's procedures and practices when handling personal information.

GUIDELINES

Applicability

This Privacy Policy informs everyone of Global's commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within Global's possession and control.

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as Global's, business address, business telephone numbers, name(s) of owner(s), executive officer(s), and director(s), job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing Global to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

- Implied consent is granted by the individual when he/she signs the application or form. This allows Global to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or



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insurance companies) in the process of assessing the eligibility of an individual, client, job applicant, or business partner.

Appropriate Use

Global collects and uses personal information solely for the purpose of conducting business and developing an understanding of its clients, and only obtains information with consent from the individual to which the information belongs.

Global hereby asserts that personal information will only be used for the following purposes:

- to provide public affairs and communication services
- to administer client accounts
- to establish and manage client relationships through promotion
- to evaluate client satisfaction
- to provide you with information about our services and about developments with Government stakeholders, to invite you to our functions and to communicate with you generally
- for identity and credential verification
- municipal, provincial and federal requirements
- to employees who require the information to perform their job duties, and to those otherwise authorized by law

Exceptionally, Global may use personal information without the individuals consent in specific circumstances where:

- Global is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal, under the purview of the appropriate authorities.
- An emergency exists that threatens an individual's life, health, or personal security.
- The personal information is already publicly available.
- Disclosure is required to investigate a breach of contract.

SECURITY AND STORAGE

Global will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy. Global currently has a retention policy in place in order to retain such documents in a safe and secure manner. Documents are stored in fire proof, securely locked cabinets, and once a file has moved into the non-active status, the file is stored in a secure storage facility on our premises until shredded. This process his professional managed by our in house corporate operations team.

Global vows to protect personal information with the appropriate security measures, physical safeguards, administrative measures, and electronic precautions. Global maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, location. Please note that no method of transmitting or storing information is completely secure. While we take appropriate measures to protect your personal information, there is always a risk that it may be lost, intercepted or misused.

Global's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases. Active files are kept in locked filing cabinets. Routers and servers connected to the Internet are protected by a firewall, and are further protected by virus attacks or "snooping" by sufficient software solutions. Personal information is not transferred to volunteers, summer students, interns, or other non-paid staff by e-mail or any other electronic format.



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TRANSPARANCY

Global's Web site will include our privacy policy and disclose our personal information practices, with information on our technical privacy such as the following:

- Personally identifiable information about the individual that is collected from the Web site or through affiliate sites.
- Information about the organization collecting the data.
- How the data will be used.
- With whom the data may or may not be disclosed.
- The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under Global's possession and control.

Our Web site may contain links to other sites, but Global is not responsible for the privacy practices of other organizations' sites. While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information. Any registration or order form asking site visitors to enter personal or financial information will be protected by SSL encryption. Site visitors are given the choice to opt out of having their personal information used at the point where the information is gathered.

In some cases, we may collect non-personally identifiable information. Examples of this type of information include the type of internet browser you are using, the type of computer operating system application software, and peripherals you are using and the domain name of the site from which you linked to our site. We use such information on an aggregated basis to do such things as operate and enhance our website. We may share non-personally identifiable information with third parties for advertising, promotional and other purposes.

We reserve the right to utilize cookie technology. A cookie is a small data file that certain sites write to your hard drive when you visit them. A cookie file can contain various types of information, including a user name that the site uses to track the pages you've visited. We may use cookies to enhance your experience on this site, to determine user traffic patterns and for other purposes. Most browsers are initially set up to accept cookies: however, you can reset your browser to refuse all cookies or indicate when a cookie is being sent or you can flush your browser of cookies from time to time. However, if you choose to disable your cookies setting or refuse to accept a cookie, you may not be able to access certain portions of the site.

ACCESS

Global will grant all individuals access to their personal information upon presentation of a written request to the contact information provided below. If an individual finds errors of fact with his/her personal information, please notify our Chief Operation Officer using the contact information below, as soon as possible to make the appropriate corrections.

Should Global deny an individual's request for access to his/her personal information, we will advise in writing of the reason for such a refusal. The individual may then challenge the decision.

CONTACT INFORMATION, QUESTIONS OR CONCERNS

If you have any questions or concerns or wish to obtain further information about our personal information policies and procedures, or wish to access your personal information or change any consent regarding our use or disclosure of your personal information, please contact our Chief Operating Officer at globalpublic@globalpublic.com or you can call #613-783-6084. We will treat all privacy concerns seriously. We will investigate any concern and seek to resolve it within a reasonable time.

Sincerely,

Global Public Affairs