

GLAHOLT LLP

BARRISTERS & SOLICITORS

Policy on the Collection, Use and Disclosure of Personal Information

Glaholt LLP (the "Firm") is a law firm based in Toronto, Ontario with clients across Canada. In keeping with our obligations as legal professionals, we are dedicated to maintaining high standards of confidentiality with respect to the information that has been provided to us. This Policy has been prepared to affirm our commitment to maintaining the privacy of our clients and others and to inform you of our practices concerning the collection, use and disclosure of information provided to the Firm.

Our legal professionals are governed, in part, by the Rules of Professional Conduct that govern them as members of the Law Society of Upper Canada. These obligations apply to all members, employees, contractors and agents who provide services in connection with our delivery of legal and other services to our clients. Other applicable laws and internal firm policies govern the protection of personal information of members, associates and employees of Glaholt LLP.

Professional Relationship. As a general rule, all information concerning the business and affairs of a person or organization acquired (1) for the purpose of determining whether the Firm will enter into a professional relationship or (2) in the course of a professional relationship shall be held in strict confidence and not revealed to anyone unless expressly or implicitly authorized by the person or organization concerned. A professional relationship develops when the Firm agrees to be retained to provide services to a particular individual or organization. In order to protect their own interests, individuals or organizations should not send confidential information to the Firm until they have had a direct discussion with a professional at the Firm regarding the retention of the Firm to provide legal services.

Despite this general rule, there are circumstances where disclosure may be justified or permitted or, where we are obliged to disclose information without consent. To illustrate, these circumstances could include:

- Where the information is known to the public;
- Where required by law or by order of a tribunal;
- Where we believe, upon reasonable grounds, that there is an imminent risk to an identifiable person or group of death or serious bodily harm;
- Where it is alleged that a member, associate or employee of the Firm is guilty of a criminal offence; civilly liable in a legal action or guilty of malpractice or misconduct;
- Where it is necessary to establish or collect fees.

In such circumstances, we will not disclose more information than is required.

Glaholt LLP collects only such information from individuals or organizations as is required for the purposes of providing our services to them. We do not sell, trade, barter or exchange any information obtained, including and especially any information obtained in the course of professional relationships.

Glaholt LLP endeavours to maintain the accuracy of any information in its possession on active matters. Information contained in documents where a file has been closed, is not actively updated or maintained.

In the event of any question concerning the management of their information, clients should first address such questions to the professional responsible for the matter. In the event a satisfactory response is not forthcoming, a client should address questions to John Margie, the Firm's Privacy Officer.

Glaholt LLP endeavours to maintain adequate physical, procedural and technical security with respect to our offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use, or modification.

Visiting Glaholt LLP's Web Site. A visitor to Glaholt LLP's Web site is not required to reveal any individually identifiable information, such as name, address, or telephone number. Nor is such information collected passively by electronic means.

Our Web server tracks general information about visitors such as their domain name and time of visit. The Firm's Web site also collects and aggregates information regarding which pages are being accessed as well as any information volunteered by visitors through feedback forms etc. This information is used internally, only in aggregate form, to better serve visitors by helping us to:

- Manage our site
- Diagnose any technical problems
- Improve the content of our Web site

Following its use, the information collected is not retained but, rather, discarded in a secure manner.

Any other information provided to us via the Glaholt LLP Web site is subject to the general rule described above. Questions about the collection of personal information via the Glaholt LLP Web site should be addressed to bb@glaholt.com.

Cookies. In browsing the Internet, you will encounter a technology called "cookies" which can be used to provide you with specific information from a Web site. A "cookie" is an element of data that a Web site can send to your browser, which may then store it on your system. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to block all cookies. The Firm's Web site does not currently use cookies.

Evolving Practices. This statement is in effect as of January 2004. Glaholt LLP will from time to time review and revise its privacy practices and this Policy. In the event of any amendment, an appropriate notice will be posted on www.glaholt.com. Policy changes will apply to the information and data collected from the date of posting and will not be applied to existing information held by Glaholt LLP without the consent of the person or organization concerned.

Questions. If you have questions or concerns regarding Glaholt LLP privacy practices, please contact a Glaholt LLP professional or send an e-mail message to bb@glaholt.com. The matter will be directed to the appropriate person within our Firm.