

MERAK Systems Corporation

PRIVACY AND DATA PROTECTION POLICY

Scope

This document presents MERAK's Privacy and Data Protection policy which applies to all personal and operational information and/or data held on MERAK employees, subcontractors, and clients. All MERAK employees and subcontractors have read and understood this policy. Additionally, all MERAK employees and subcontractors have signed a statement asserting they will apply this policy.

Purpose

While exercising its right to collect, use, and disclose personal and operational information and/or data for legitimate business purposes, MERAK is committed to protect, in all countries where it does business, the personal and operational information and/or data concerning:

- Our employees
- Our subcontractors
- Our clients and their operations

The strict rules of conduct for information handling are maintained in order to decrease the likelihood of:

- Confidentiality breaches;
- Loss of privacy
- Loss of trust
- Legal liability

Principles for Information Handling Practices

MERAK is committed to protect the personal information of its employees and subcontractors with respect to staffing, employee management, compensation and benefits administration purposes.

MERAK may also collect personal and operational information and/or data on clients and client personnel, for example, in Information Technology and outsourcing contracts. All client personal and operational information and/or data collected by MERAK will comply with the policies and procedures established by the client and/or MERAK. As well, MERAK will always respect and act in compliance with all applicable legislation. Specifically, this policy is intended to comply with the Canadian government's new Personal Information Protection and Electronic Documents Act (PIPEDA), effective January 1, 2004.

Accountability

MERAK's Privacy Officer oversees the application of this policy and takes corrective action on violations and non-compliance. MERAK employees and subcontractors who have concerns regarding the privacy of their own, subcontractor, or client personal information should report their concerns as well as any weakness in the measures protecting such information to their manager (for client and subcontractor personal information) or to their local Human Resources representative (for employee personal information).

All employees and subcontractors must respect this Privacy and Data Protection Policy and, in doing so, respect the privacy of other MERAK employees, subcontractors, clients, and the client's privacy policies when working at a client site. All employees and subcontractors who hold and manage client personal and operational information and/or data, as a result of providing services to these clients, must protect such information and data.

Identifying Purpose of Collection

MERAK's Privacy officer must advise employees, subcontractors and clients why the personal information is being collected and how the information will be used. Individuals will be notified of any new purposes for the information and their consent will be obtained before using it.

MERAK respects the privacy of any visitors to www.meraksystems.com and recommends reading the privacy policy in conjunction with that website. MERAK does not share any personal information with third parties.

Consent for Collection

The employee's, subcontractor's, or client's written or electronic consent will be obtained for the collection of information, the use of information, and whenever a new use of the information is identified.

Limiting Collection

Only the information necessary will be collected for the identified purpose. MERAK does not collect personal information indiscriminately or deceive individuals about the reasons for collecting information.

Limiting Use, Disclosure, and Retention

MERAK will use and disclose information only for the purpose for which it was collected or when required by legislation (in the manner prescribed by the legislation in the jurisdiction where MERAK does business). Information will be retained only as long as necessary and all sensitive information will be disposed of in a secure manner.

Accuracy

MERAK will ensure the accuracy of the information collected by verifying with the individual and updating it periodically. MERAK employees and subcontractors must notify their local Human Resources of any changes or updates that will affect their personal records.

Safeguards

MERAK will protect personal and operational information and/or data according to its sensitivity and as required by any applicable legislation. Sensitive personal and operational information and/or data is to be protected from unauthorized use, disclosure, access, and modification. These safeguards apply to sensitive personal and operational information and/or data irrespective of the storage medium.

Such safeguards may take the form of locked filing cabinets or restricted access to information (physical, on a need-to-know basis, alarm systems or other electronic control devices, technological tools such as passwords, encryption, firewalls, software that renders anonymity, etc). The selection of safeguards will be done considering the sensitivity, amount, and format of the information or data needing protection.

Security measures around data protection are reviewed regularly to follow the company evolution or changes in the organization.

Individual Access

MERAK will provide employees, subcontractors and clients access to their own personal information held by MERAK so that they may know what information is retained. Provide the employees, subcontractors and clients an opportunity to verify the accuracy of their information and to correct any inaccuracies. Inform in writing, if access is refused, of the reasons why and the details for the appeal process.

No Expectation of Privacy

Subject to the applicable legislation, MERAK has the right to monitor any and all aspects of its information systems and infrastructures including, but not limited to:

- Visited Internet sites
- Instant messaging systems
- Chat groups
- News groups
- E-mail sent and/or received

Such monitoring may occur at any time, without notice, and without obtaining the user's permission.

Openness

In distributing this document, MERAK advises its employees, subcontractors, and clients about MERAK's practices and the application of this policy.

Recourse

A simple complaint procedure is in place for employees, subcontractors, and clients. Any violation in the handling of client personal or operational information and/or data, in the context of providing services to these clients, should be reported directly to the Manager responsible for the Business Unit safeguarding such information or data.

Sanctions for Violation

Violations of this policy may result in a disciplinary action which will be proportional to the seriousness of the behaviour concerned. Managers responsible for Business Units or corporate functions are responsible to decide on the proper course of action in case of a breach to this policy. MERAK appoints and maintains a designated Privacy and Data Protection Officer.

MERAK would appreciate your help in keeping your contact information current and complete. If you have any questions or concerns about the privacy of your personal information, or if your contact information has changed, please email info@meraksystems.com or call us at 519.767.1292.