

PRIVACY POLICY FOR RENNIE MARKETING SYSTEMS

Our privacy policy includes provisions of the *Personal Information Protection Act* (BC) and the *Personal Information Protection and Electronic Documents Act* (Canada), (the "Applicable Law").

SUMMARY OF PRINCIPLES

1. Accountability

Rennie Marketing Systems is responsible for personal information under its control and shall designate one or more persons who are responsible for Rennie Marketing Systems' compliance with the principles contained in this privacy policy and for compliance with Applicable Law.

2. Identifying Purposes for the Collection of Personal Information

When required by Applicable Law, Rennie Marketing Systems shall identify the purposes for which personal information is collected at or before the time that the information is collected.

3. Consent for the Collection, Use or Disclosure of Personal Information

When required by Applicable Law, the knowledge and consent of a Protected Individual are required for the collection, use or disclosure of personal information.

4. Limiting the Collection of Personal Information

When required by Applicable Law, Rennie Marketing Systems shall limit the collection of personal information to that which is necessary for the purposes identified by Rennie Marketing Systems . Rennie Marketing Systems shall collect personal information by fair and lawful means.

5. Limiting the Use, Disclosure and Retention of Personal Information

Rennie Marketing Systems shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the Protected Individual or in accordance with Applicable Law. As required by Applicable Law, Rennie Marketing Systems shall retain personal information only as long as necessary for the fulfillment of those purposes.

6. Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

7. Security Safeguards

As required by Applicable Law, Rennie Marketing Systems shall protect personal information by security safeguards appropriate to the sensitivity of the information.

8. Openness Concerning Policies + Practices

Rennie Marketing Systems shall make readily available to Protected Individuals specific information about its policies and practices relating to the management of personal information.

9. Customer and Employee Access to Personal Information

As required by Applicable Law, Rennie Marketing Systems shall inform a Protected Individual of the existence, use, and disclosure of his or her personal information upon request and shall give

the individual access to that information. A Protected Individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance

A Protected Individual shall be able to address a challenge concerning compliance with the above principles or with Applicable Law to the designated person or persons accountable for Rennie Marketing Systems 's compliance with this privacy policy.

WHO AND WHAT OUR PRIVACY POLICY APPLIES TO

This privacy policy applies to personal information about Protected Individuals that is collected, used or disclosed by Rennie Marketing Systems and which is covered by Applicable Law.

This privacy policy does not apply to the following types of information:

- * an employee's or customer's name, title, business address (including business e-mail address) or business telephone number or business fax number;
- * other information that is not personal information protected by Applicable Law; or
- * other information about the customer or employee that is publicly available or which is specified by regulation under Applicable Law.

DEFINITIONS

“collection”: the act of gathering, acquiring, recording or obtaining personal information from any source, including third parties, by any means.

“consent”: voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Rennie Marketing Systems . Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

“customer”: an individual (in their capacity as an individual either personally, or through a business carried on as a sole proprietorship or partnership) who uses, or applies to use, Rennie Marketing Systems' products or services and the term ‘customer’ shall include a potential or prospective customer who has provided personal information to Rennie Marketing Systems.

“disclosure”: making personal information available to a third party.

“employee”: an employee of Rennie Marketing Systems .

“personal information”: personal information as defined by Applicable Law about a Protected Individual, but does not include aggregated information that cannot be associated with a specific individual. For a customer, such information includes a customer's credit information, billing records, service, and any recorded complaints. For an employee, such information includes information found in personal employment files, performance appraisals, and medical and benefits information, but does not include the employee's name, title, business address (including e-mail address) or business telephone or fax numbers.

“Protected Individual”: means an individual whose personal information is protected by Applicable Law. Those persons who are included in the definition of Protected Individual will vary depending upon which Applicable Law applies to Rennie Marketing Systems in the circumstances. Generally, the definitions will be the following.

Where the Applicable Law is the Personal Information Protection and Electronic Documents Act (Canada), "Protected Individual" will generally include:

- * an individual who is a customer of Rennie Marketing Systems; and
- * an individual whose personal information is collected, used or disclosed by Rennie Marketing Systems in the course of commercial activity.

Where the Applicable Law is the Personal Information Protection Act (British Columbia), "Protected Individual" will generally include:

- * an individual who is a customer of Rennie Marketing Systems; and
- * an individual whose personal information is collected, used or disclosed by Rennie Marketing Systems; and
- * an employee of Rennie Marketing Systems.

"third party": an individual or organization outside Rennie Marketing Systems .

"use": the treatment, handling and management of personal information by and within Rennie Marketing Systems.

OUR DETAILED PRIVACY POLICY

The following sections provide more detail on the summary of principles outlined above.

1. Accountability

1.1 The management of Rennie Marketing Systems is responsible for ensuring compliance with this privacy policy and with Applicable Law. Rennie Marketing Systems shall designate one or more persons to be accountable for compliance with this policy and with Applicable Law. Other individuals may be delegated to act on behalf of the designated person(s) or to take responsibility for the day-to-day collection and processing of personal information.

1.2 Rennie Marketing Systems shall make known, upon request, the name of the person or persons who have been designated to take responsibility for compliance with this policy and with Applicable Law.

1.3 Rennie Marketing Systems is responsible for personal information in its possession or control. Rennie Marketing Systems shall use appropriate means to provide a comparable level of protection while information is being processed by a third party.

1.4 Rennie Marketing Systems shall implement policies and procedures to give effect to this privacy policy.

2. Identifying Purposes for the Collection of Personal Information

2.1 Rennie Marketing Systems collects personal information only for the following purposes ("identified purposes"):

- * to establish and maintain responsible commercial relations with customers and to provide ongoing service;
- * to understand customer needs and preferences and to provide customers with information related to those needs and preferences;
- * to develop, enhance, market or provide products and services to customers including contacting customers for these purposes using any contact information that was provided to Rennie Marketing Systems;

- * to manage and develop Rennie Marketing Systems' business and operations, including personnel and employment matters; and
- * to meet legal and regulatory requirements.

2.2 When required by Applicable Law, Rennie Marketing Systems shall specify orally, electronically or in writing the identified purposes to the Protected Individual at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the Protected Individual to a designated person who shall explain the purposes.

2.3 Unless permitted by Applicable Law or required by other laws, Rennie Marketing Systems shall not use or disclose for any new purpose personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the Protected Individual .

3. Consent for the Collection, Use or Disclosure of Personal Information

3.1 In obtaining consent and when required by Applicable Law, Rennie Marketing Systems shall use reasonable efforts to ensure that a Protected Individual is advised of the identified purposes for which personal information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the Protected Individual .

3.2 Generally, and when required by Applicable Law, Rennie Marketing Systems shall seek consent to use and disclose personal information at the same time it collects the information. However, the Rennie Marketing Systems may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

3.3 Rennie Marketing Systems will require customers to consent to the collection, use or disclosure of personal information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes.

3.4 In determining, the appropriate form of consent, Rennie Marketing Systems shall take into account the sensitivity of the personal information and the reasonable expectations of Protected Individuals.

3.5 In general, the use of products and services or the acceptance of employment or benefits by a Protected Individual, constitutes implied consent for Rennie Marketing Systems to collect, use and disclose personal information for all identified purposes.

3.6 A Protected Individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Depending upon the circumstances, the withdrawal of consent may affect Rennie Marketing Systems' ability to provide products, services or employment to the Protected Individual . Protected Individuals should contact Rennie Marketing Systems for more information regarding the implications of withdrawing consent.

4. Limiting Collection of Personal Information

4.1 Rennie Marketing Systems collects personal information primarily from its customers and employees but may collect personal information in appropriate circumstances from other Protected Individuals.

4.2 Rennie Marketing Systems may also collect personal information from other sources including credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

5. Limiting Use, Disclosure, and Retention of Personal Information

5.1 Where Protected Individuals include customers, Rennie Marketing Systems may disclose a customer's personal information to:

- * a person who in the reasonable judgment of Rennie Marketing Systems is seeking the information as an agent of the customer;
- * another company involved in supplying the customer with services related to the services provided by Rennie Marketing Systems (including the developers of real estate projects for which Rennie Marketing Systems is providing marketing services);
- * a company or individual employed by Rennie Marketing Systems to perform functions on its behalf, such as research or data processing;
- * another company or individual for the development, enhancement, marketing or provision of any of Rennie Marketing Systems' products or services;
- * an agent used by Rennie Marketing Systems to evaluate the customer's creditworthiness or to collect the customer's account;
- * a credit reporting agency;
- * a public authority or agent of a public authority, if in the reasonable judgment of Rennie Marketing Systems, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; and
- * a third party or parties, where the customer consents to such disclosure, or where disclosure is permitted by Applicable Law, or where disclosure is required by other laws.

5.2 Where Protected Individuals include employees, Rennie Marketing Systems may disclose personal information about its employees:

- * for normal personnel and benefits administration;
- * in the context of providing references regarding current or former employees in response to requests from prospective employers; or
- * where the employee consents to such disclosure or where disclosure is permitted by Applicable Law, or where disclosure is required by other laws.

5.3 Only Rennie Marketing Systems' employees with a business need to know, or whose duties reasonably so require, are granted access to personal information about Protected Individuals.

5.4 Rennie Marketing Systems shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a Protected Individual, Rennie Marketing Systems shall retain, for a period of time that is reasonably sufficient to allow access by the Protected Individual, either the actual information or the rationale for making the decision.

5.5 Rennie Marketing Systems shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

6. Accuracy of Personal Information

6.1. Personal information used by Rennie Marketing Systems shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a Protected Individual.

6.2 Rennie Marketing Systems shall update personal information about Protected Individuals as and when necessary to fulfill the identified purposes or upon notification by the Protected Individual.

7. Security Safeguards

7.1 Rennie Marketing Systems shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures. Rennie Marketing Systems shall protect the information regardless of the format in which it is held.

7.2 Rennie Marketing Systems shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7.3 All of Rennie Marketing Systems' employees with access to personal information shall be required to respect the confidentiality of that information.

8. Openness Concerning Policies and Practices

8.1 Rennie Marketing Systems shall make information about its policies and practices easy to understand, including:

- * the title and address of the person or persons accountable for Rennie Marketing Systems' compliance with Rennie Marketing Systems' privacy policy and to whom inquiries or complaints can be forwarded;
- * the means of gaining access to personal information held by Rennie Marketing Systems; and
- * a description of the type of personal information held by Rennie Marketing Systems, including a general account of its use.

9. Customer and Employee Access to Personal Information

9.1 Upon request and as required by Applicable Law, Rennie Marketing Systems shall allow Protected Individuals a reasonable opportunity to review the personal information held by Rennie Marketing Systems. Personal information shall be provided within a reasonable time, and, if there is a charge for providing the information, the charge shall be a reasonable charge permitted by Applicable Law.

9.2 In certain situations, Rennie Marketing Systems may not be able to provide access to all the personal information that it holds about a Protected Individual. For example, Rennie Marketing Systems may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Rennie Marketing Systems may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If access to personal information cannot be provided, Rennie Marketing Systems shall provide the reasons for denying access upon request.

9.3 Upon request, Rennie Marketing Systems shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, Rennie Marketing Systems shall provide a list of organizations to which it may have disclosed personal information about the Protected Individual when it is not possible to provide an actual list.

9.4 In order to safeguard personal information, a Protected Individual may be required to provide sufficient identification information to permit Rennie Marketing Systems to account for the existence, use and disclosure of personal information and to authorize access to the Protected Individual's information. Any such information shall be used only for this purpose.

9.5 Rennie Marketing Systems shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the Protected Individual's file. Where appropriate, Rennie Marketing Systems shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.6 Protected Individuals can seek access to their personal information by contacting our Privacy Officer whose contact information is listed below.

10. Challenging Compliance

10.1 Rennie Marketing Systems shall maintain procedures for addressing and responding to all inquiries or complaints from Protected Individuals about the handling of personal information.

10.2 Rennie Marketing Systems shall inform Protected Individuals about the existence of these procedures as well as the availability of complaint procedures.

10.3 The person or persons accountable for compliance with Rennie Marketing Systems' privacy policy may seek external advice where appropriate before providing a final response to individual complaints.

10.4 Rennie Marketing Systems shall investigate all complaints concerning compliance with Rennie Marketing Systems' privacy policy. If a complaint is found to be justified, Rennie Marketing Systems shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A Protected Individual shall be informed of the outcome of the investigation regarding his or her complaint.

10.5 A Protected Individual may seek advice from the Office of the Privacy Commissioner (British Columbia) at 1 250 387 5629 and, if appropriate, file a written complaint with that office. However, the Protected Individual is encouraged to use Rennie Marketing Systems' internal information and complaint procedures first.

11. Additional Provisions

Our privacy policy is based on the ten principles of the Canadian Standards Association (CSA) Model Code for the protection of personal information which was published in 1996 as a National Standard of Canada.

If you have questions about our privacy policy, please submit them to our Privacy Officer whose contact information is as follows:

Telephone: 604 682 2088
Email: privacy@rennie.com

PRIVACY + COMPLAINT PROCEDURES FOR RENNIE MARKETING SYSTEMS

If you wish to make an information request or a complaint to Rennie Marketing Systems, please follow the procedures listed below. If you have questions about these procedures, please direct them to our Privacy Officer whose contact information is listed below.

Step 1: Submit your Request or Complaint

You can make an online request or complaint to our privacy officer by contacting our Privacy Officer. If you use e-mail to contact our Privacy Officer, you should be aware that e-mail is not a secure or confidential method of communication. By contacting our Privacy Officer with a request or complaint, you consent to the provision of your information to Rennie Marketing Systems for the purposes of processing your request or complaint. Your information will not be shared with anyone else.

Step 2: Confirmation of Request or Complaint

You should receive confirmation of your request or complaint from our Privacy Officer within 3 business days of submitting the request or complaint. If you do not receive confirmation, please contact our Privacy Officer by using the contact information listed below.

Step 3: Response

We will provide you with a response to your request or complaint within 30 calendar days of your original submission. If we are unable to provide you with a response within this time, we will contact you and notify you of the reasons and provide you with our expected response date. If we are unable to provide you with the information that you have requested, we will contact you and notify you of the reasons.

Step 4: Follow-Up

If you are not satisfied with our response, please contact our Privacy Officer using the contact information listed below. Our Privacy Officer will work with you and attempt to resolve any outstanding issues.

Step 5: Failure to Resolve Issues

If you are unable to resolve your outstanding issues with our Privacy Officer, you have a right to apply to the office of the relevant Privacy Commissioner: the Office of the Privacy Commissioner (British Columbia) at 1 250 387 5629 who can assist you with your request or complaint.

CONTACT INFORMATION FOR OUR PRIVACY OFFICER

You may contact our Privacy Officer as follows:

Telephone: 604 682 2088
Email: privacy@rennie.com