

GFI Systems Inc.

Personal Information Protection Policy

GFI Systems Inc. is committed to safeguarding the personal information entrusted to us by our clients, or collected by us pursuant to agreements with our clients. We manage personal information in accordance with the *Personal Information Protection Act* (Alberta) and the *Personal Information Protection and Electronics Documents Act* (Canada).

This Policy outlines the principles and practices we follow in protecting your personal information. This Policy applies to GFI Systems Inc. and its subsidiaries. This Policy and any applicable government privacy legislation applies to the collection, use and disclosure of your personal information. We want you to know:

- (a) Why we collect your personal information;
- (b) How we use and disclose your personal information in establishing and maintaining your relationship with us and in accordance with client agreements;
- (c) How we keep your personal information confidential; and
- (d) How you can inquire about the personal information we hold about you.

What is Personal Information?

We collect personal information about you in order to provide our clients with services they request. Personal information means information about an identifiable individual. It includes information that you provide to us or that we collect from other sources. For example, personal information includes your: name and address, age and gender, personal financial records, identification numbers including your social insurance number, personal references, employment information, location data, and employment records. It does not include business contact information used for business purposes.

What Personal Information Do We Collect?

The personal information we collect about you depends on the nature of your relationship with us. We collect only the personal information that we need for the purposes of providing services to our clients.

We normally collect client information directly from our clients and through technical means. We may collect your information from other persons with your consent or as authorized by law.

We inform our clients before or at the time of collecting personal information about individuals, of the purposes for which we are collecting the information. Our clients are responsible for ensuring that consent from identifiable individuals is received in relation to the collection where

required by law. If you have any questions, please ask. If a new purpose for using your personal information develops, we will ask for your consent prior to using your personal information.

Location Information

We collect information about the location of our clients' vehicles and equipment, and provide that information to our clients for their internal use. That information is not associated with an identifiable individual unless the client associates the relevant location information with such person. The use of location information collected and made available to our clients in relation to an identifiable individual should be discussed with the relevant client requesting services from GFI Systems Inc.

Using and Disclosing Your Personal Information

We need certain personal information in order to conduct business with you and provide services to you. We may use your personal information for the following purposes:

- To process and deliver a service offered by us;
- To determine the suitability of services for you;
- To determine your eligibility for certain services;
- To deliver the services to a client; and
- To comply with legal requirements.

GFI Systems Inc. may store personal information and related data outside of Canada, including in the United States. Some jurisdictions outside of Canada do not have laws that provide privacy protections substantially similar to those in Canada. GFI Systems Inc. remains responsible for ensuring that personal information remains subject to the standards set out in this policy.

Accessing Your Personal Information

If you want to review or verify your personal information please contact our privacy officer. We will forward you an access request form that will provide us with the information we need in order to search for and provide you with the personal information we hold about you. We may charge you a fee for your request, however, we will provide you with an estimate in advance.

There are a few instances where we will not be able to provide some of the personal information we hold about you. These include, but are not limited to, situations where the information contains references to other persons, the information is subject to solicitor-client or litigation privilege, the information is no longer retained by us, or the information cannot be disclosed for legal reasons. If we are unable to provide you with access to your personal information, we will explain the reason why.

Keeping Your Personal Information Accurate

We are committed to maintaining the accuracy of personal information for as long as it is being used for the purposes we have identified. To help keep your personal information up-to-date, we encourage you to notify us of any changes. Notification of changes to your address and telephone number will help us provide you with the best possible service. If, upon review of your personal information, you discover any inaccuracies, please contact us. We may ask that you put your request for a correction in writing.

Protecting Your Personal Information

Our employees are responsible for maintaining the confidentiality of personal information to which they have access. As a condition of employment, our employees are required to sign a Confidentiality and Non-Disclosure Agreement binding them to this responsibility which governs their actions, even after they are no longer employed by GFI Systems Inc.

We keep our employees informed about our policies and procedures for protecting personal information and reinforce the importance of complying with them. Our employees are also required, as a condition of employment, to conform to these policies and procedures.

We endeavour to maintain adequate physical, procedural and electronic security with respect to our offices and information storage facilities so as to prevent unauthorized access, use, or disclosure of your personal information.

Retention of Your Personal Information

We keep your personal information for as long as we need it in order to meet the purposes for which it was collected. The length of time we retain your personal information varies, depending on the nature of the relationship between us and our clients, the type of service we are providing and any regulatory or legal requirements we may be required to meet.

Summary

We take our responsibility to respect and protect your personal information seriously.

If you have any questions about this Privacy Policy or our privacy practices, or if you would like to review your personal information, please contact us.