

PASON SYSTEMS CORP. PRIVACY POLICY

Pason Systems Corp. ("**Pason**") is committed to protecting your privacy and maintaining the integrity of any identifiable information that we collect about our users ("**Personal Information**") through the www.Pason.com website and any related Pason websites (collectively, the "**Site**"). Pason believes that it is important that our users understand what Personal Information is collected and the following Privacy Policy explains Pason's privacy practices, describes the steps that Pason takes to keep your Personal Information confidential, to inform you about how and why Pason collects Personal Information and to provide you with Pason contact information should you have questions or concerns about our online Personal Information protection practices. We understand that you want control over how Pason collects, uses and discloses your Personal Information.

How Pason protects your Personal Information

Pason keeps your Personal Information and the business that you do with us in strict confidence. Your Personal Information is not sold and you have control over how Pason obtains, uses, and gives out Personal Information about you. You also have access to the Personal Information that Pason has about you and Pason respects your privacy when we market our products and services.

What type of Personal Information does Pason collect?

Pason collects various types of Personal Information. To access certain of our services (including but not limited to the DataHub), you will be asked to provide certain contact information (such as your name, e-mail address, address, postal code, telephone number, etc.). Should you wish to use the online job application features of this Site, you may also specifically be asked to provide your work experience, formal education, training, certifications, skill set, abilities and other work related information, etc.

How does Pason collect Personal Information?

Pason will only collect Personal Information that you have voluntarily provided to us. Pason will not collect any Personal Information about you without informing you ahead of time (either through this Privacy Policy or at the time Pason is requesting Personal Information from you) why and how Personal Information is being collected and how such Personal Information will be used or disclosed (if applicable).

The following are examples of how Pason may collect Personal Information:

- a) Online Job Applications - Users of the Site may search online for available positions at Pason and submit job applications online with respect to such openings. Users who use such service will be asked to provide a cover letter, a resume and provide particulars as to their work experience, proficiencies and work preferences.
- b) Promotional Events - From time-to-time Pason offers various promotions. When participating in these promotions, you may be asked to provide us with certain Personal Information. You are free at any time to have your Personal Information removed from our database or to have your name removed from our marketing distribution list on a go-forward basis.
- c) Clickstreaming - Clickstreaming is a technology that allows the Site operator to track the paths that surfers take as they access a website and look at the site's pages, and as they use links to other sites. Pason collects such information from visitors to the Site.

d) Web site traffic information – Pason monitors and analyses traffic information on the Site in order to determine which features and services are popular and useful to visitors, so that Pason can improve our services.

Lastly, our web servers also seek (as many websites do) to place a "cookie" (a small data file) on your computer's hard drive which allows the server to identify the computer when it visits again, in order to improve site navigation. This cookie is not used to obtain your name or any Personal Information, and the information that is tracked is used for internal purposes only. However, if you prefer not to accept cookies, you can set your browser to reject them or to alert you before one is placed.

The collection of Personal Information

Why does Pason collect your Personal Information? Pason collects Personal Information and uses it solely in order to: (i) understand your needs and eligibility for products and services; (ii) recommend particular products and services to meet your needs; (iii) provide ongoing services; (iv) improve service delivery; (v) answer your questions, queries or complaints; (vi) review and evaluate job applications filed online through the Site; (vii) provide you with information (e.g. through direct mail and/ or e-newsletters); (viii) protect you and us from error and fraud; and (ix), where required, cooperate with law enforcement authorities, to comply with a court order or to prevent a breach of any applicable law. Pason will infer your consent to the collection of Personal Information for these purposes through your use of the Site and Pason's systems.

We collect, use and disclose Personal Information only for purposes that a reasonable person would consider appropriate in the circumstances.

How Pason may disclose Personal Information

Pason does not sell to third parties any Personal Information that Pason collects. Pason will obtain your consent before Pason obtains, uses or discloses to other persons, information about you except as otherwise described in this Privacy Policy unless we are obliged to do so by law or to protect Pason's interests.

Pason may share the Personal Information that you provide with other companies hired to provide services for us. These companies - our third party vendors - are contractually bound to use Personal Information shared with them only to perform the services they have been hired to provide. Pason does not share, sell, or lease Personal Information about you to any other third-parties except as otherwise described in this Privacy Policy.

By choosing to provide Pason with your Personal Information as described in this Privacy Policy, you are further consenting to its use in accordance with the principles outlined in this Privacy Policy and as may be further outlined at the time of collection.

You may withdraw your consent after you have given it

The protection of your Personal Information is of critical importance to us. If you don't want Pason to use Personal Information collected about you for marketing or publicity purposes, please tell us at the time the information is collected. You can withdraw your consent any time after you have given it to us, provided there are no legal requirements to prevent this, by sending an e-mail to privacy@pason.com.

Please note, if you do not consent to certain uses of information, or if you withdraw your consent, Pason may not be able to provide you with a particular product or service. If so, Pason will explain the situation to you to help you with your decision.

Pason asks for your consent before sharing Personal Information with third parties

We may share Personal Information about you within Pason and with our third party vendors, however, Pason will not release it to anyone outside of Pason and such third party vendors without your consent.

There are some limited exceptions to the above rule. For example, Pason may collect, use or disclose Personal Information without your consent if Pason: i) must disclose information for legal reasons as we may be compelled to release information by a court of law, or other legal or regulatory authority. If so, our policy is to release Personal Information only to the extent that Pason is required to do so; ii) has to protect the interests of Pason as in certain circumstances, Pason may have to collect, use or release Personal Information for its protection. For example, Pason may do so to detect or prevent fraud.

Verifying and amending your Personal Information

You can check your Personal Information to verify, update and correct it, and to have any obsolete Personal Information removed. For the purpose of clarity, Pason will ask you to put your request in writing. There is no charge for verifying or correcting your Personal Information. Depending on the circumstances, there may be a charge if you want a copy of records, which Pason has already given you. We will let you know in advance if there is a charge.

It may not be appropriate for us to release certain information to you. Where information will not or cannot be disclosed, Pason will provide you with the reasons for non-disclosure.

If Pason has obtained Personal Information about you from other third parties, upon your request, Pason will let you know the third party that we received it from, subject to applicable law.

If you ask, Pason will endeavour to let you know the names of outside companies or organizations we have given Personal Information to. This may include Personal Information given to outside companies that Pason has used to do work for us, such as mailing houses.

Responding to your request

We will use commercially reasonable efforts to deal quickly with your request to see Personal Information, and always respond to you within thirty (30) days. If Pason needs to extend the time, or Pason has to refuse your request, Pason will tell you why, subject to any legal restrictions and Pason will notify you of the new deadline, the reasons for the extension, and your rights under applicable legislation respecting the extension.

Whenever possible, Pason will update any Personal Information obtained from any source. If a third party has given us Personal Information which you tell us is incorrect, Pason will give you the name and address of that party so that you can correct the Personal Information.

Additionally, there may be files that include Personal Information about you and other customers/users, or that have information confidential to Pason or are the property of Pason. As Pason must protect everyone's confidentiality and legal rights, Pason cannot make these files available to persons outside of Pason. However, Pason will make available to you any factual Personal Information about you contained in such files.

Security

Pason will maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

Pason keeps the Personal Information that we collect about you strictly confidential. Only authorized personnel have access to this Personal Information. Pason and its third party vendor personnel who have access to Personal Information receive special training regarding privacy protection.

If any employee of Pason or its third party vendors misuses Personal Information, Pason will consider such action as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses Personal Information - provided for the purpose of providing services to or for Pason – then Pason will consider this as a serious issue for which action may be taken, up to and including termination of any agreement between Pason and that individual or organization.

Pason's computer security specialists endeavour to build security into all our computer systems. This protects your Personal Information at all times, when it is stored in data files or handled by our employees. Pason's systems also protect your Personal Information when it is transmitted, for example, between our data processing centers, our stores and corporate offices.

Pason has taken steps to protect the confidentiality of your on-line viewing. When you visit the Site, the Site is able to recognize your Internet service provider, but does not identify you as an individual. Pason has also taken steps to ensure that any service providers and suppliers with whom we share any Personal Information are committed to maintaining the privacy of your Personal Information, as outlined in this Privacy Policy, and refraining from making any independent or unauthorized use of such Personal Information.

However, for greater clarity, Pason cannot guarantee that any Personal Information that you may choose to disclose via the Internet will not be intercepted by third parties. We assume no responsibility for Personal Information disclosed through the Internet, which is intercepted, diverted or otherwise accessed.

Retention and disposal

Pason keeps your Personal Information only so long as we need it for the products and services that you are using, to offer you products and services when you are a customer and for a reasonable time thereafter, or to meet any legal requirements. Pason has retention standards, which meet these requirements. Pason destroys your Personal Information when it is no longer needed, or we remove your name from the Personal Information.

Resolving your concerns

Pason is committed to upholding the Pason Privacy Policy. Since Pason is responsible for the Personal Information under its control, it has designated its Privacy Officer as accountable for Pason's overall compliance with privacy laws and with this Policy. Responsibility for ensuring compliance with the Pason Privacy Policy rests with our Privacy Officer, who may designate one or more persons to be accountable for its compliance. Other individuals within Pason may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and processing of Personal Information. Pason will dedicate such resources as are reasonably necessary to ensure these privacy

principles are adhered to, and shall review these resources periodically. If you have any questions, concerns or complaints about our Privacy Policy, or about how Pason is living up to it, please let us know right away by sending the Privacy Officer an email at privacy@pason.com or by sending the Privacy Officer a letter to the following address:

Pason Systems Corp.
6130 – 3rd Street S.E,
Calgary, Alberta, Canada T2H 1K4
Attention: Privacy Officer

Whatever the circumstances, resolving the problem for you is our primary concern. Providing legal action has not been taken on the matter, the Privacy Officer will further consider your concern and you will receive a response within thirty (30) business days. If you are not satisfied with the decision of Pason's Privacy Officer regarding your complaint, you can ask how your complaint can be further escalated.