

Subject: Privacy Policy
Effective Date: July 1, 2008

The Company respects the privacy rights of our employees and has always been committed to protecting all personal information our possession or control. We have adopted this Privacy Policy to guide how we collect, use and disclose the personal information we require in the course of fulfilling our professional responsibilities and operating our business. This Privacy Policy applies to all subsidiaries and affiliates.

While the Company has always taken the privacy and confidentiality of our employees very seriously, we have developed this Privacy Policy to clearly define our ongoing commitment to protecting privacy rights. Certain of the practices discussed in this Policy reflect requirements set out in both federal and provincial privacy legislation. Our goal is to respond to the requirements of the law, and to be responsive to our employees who expect us to demonstrate our commitment to respecting their privacy and protecting their personal information.

Personal information is information about an identifiable individual. It includes information such as age, income, opinion, home location and family. It does not include the name, title, business address or telephone number of an employee of an organization.

Principle 1 – We are accountable for the personal information in our possession.

The Company is accountable for all personal information in our possession or control. This includes any personal information that we receive directly, for example, from individual employees, as well as individual's personal information that we may receive indirectly. We have established policies and procedures aimed at protecting personal information. The Chief Financial Officer will oversee privacy issues for the Company. We have also educated our employees about our Privacy Policy and their role in protecting your personal information.

Principle 2 – The Company will inform you why we are collecting your personal information when the information is collected.

We collect personal information from our employees in order to pay them, comply with laws, provide them with benefits, and administer performance management tools and to improve on programs, policies and employee relations. In certain cases, we may also aggregate employee personal information to provide business metrics and evaluate the effectiveness of our HR programs. In these circumstances, the information is not identifiable with any individual.

We also collect personal information from individuals seeking employment with the Company.

When we collect personal information, we inform you of the reasons why we require such information, what use will be made of it and with whom it may be shared.

Principle 3 – The Company will use and disclose your personal information only for the purposes for which we have your consent. We will keep personal information only as long as necessary to accomplish these purposes.

Use of Personal Information

If we intend to use your personal information for a purpose not previously identified to you, we will obtain your prior consent.

However, we may use personal information without consent where for the purpose of acting in respect of an emergency that threatens the life, health or security of an individual. We may also disclose personal information without consent as permitted or required by applicable federal and provincial privacy laws including:

- to comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction or to comply with rules of conduct required by regulatory bodies
- to a government institution that has requested the information, identified its lawful authority, and indicates that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial or foreign law, or suspects that the information related to national security or the conduct of international affairs; or is for the purpose of administering any federal or provincial law
- to an investigative body or government institution on our initiative when we believe the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or we suspect the information related to national security or the conduct of international affairs.

Retention of personal information

The Company retains personal information about current and past employees in accordance with employment laws and standards.

Principle 4 – The Company will endeavor to keep accurate the personal information in our possession or control.

In order to provide you with appropriate benefits, the personal information that we collect about you must be accurate, complete and current. From time to time, you may be asked to update your personal information. You are encouraged to advise us of any changes to your personal information.

Principle 5 – The Company protects your personal information with safeguards appropriate to the sensitivity of the information.

We protect your personal information by using physically secure facilities, industry standard security tools and practices, and clearly defined internal policies and practices. Security measures are in place to protect the loss, misuse and alteration of the information under our control. Personal information collected is stored in secure operating environments that are not available to the public (e.g., locked rooms and filing cabinets). To prevent unauthorized electronic access to personal information, we maintain information collected in a secure environment.

We are responsible for all personal information transferred to third parties for processing. We require third party processors to respect the confidentiality of personal information and all legal requirements under applicable federal and provincial privacy legislation, and to agree to contractual requirements that are consistent with our Privacy Policy. These third party processors are prohibited from using personal information except for the specific purpose(s) for which we supply it to them.

Approval of Privacy Policy

Jan Horejsi, Director

Date

Clifford M. James, President and CEO

Date