

Privacy Code

Our commitment to privacy: Metroland North Media, a division of Metroland Media Group Ltd. a wholly owned subsidiary of the Torstar Corporation, knows that protecting the privacy and confidentiality of your personal information is important to consumers. This Privacy Code governs **Barrie Advance, Alliston Herald, Orillia Today, Midland Mirror, Collingwood/Wasaga Connection, Stayner Sun, Wasaga Sun, Business Times, Goodlife Magazine, Onsite Magazine, Barrie Real Estate, Georgian Bay Real Estate, Orillia Real Estate, Midland Real Estate, Alliston Real Estate.** Collection, use and disclosure of personal information by us and our affiliates are governed by the *Personal Information Protection and Electronic Documents Act* (the “Act”), and any applicable provincial legislation. This Privacy Code explains what personal information is collected from its customers and how it is used. It also explains how you can ask questions, make suggestions, and complain about our privacy practices. This Privacy Code applies to personal information (see below) collected by us, including our websites. Be aware that our websites may contain links to other websites provided and maintained exclusively by third parties not subject to this Privacy Code. Please review the privacy policies on any external websites to determine their information handling practices.

For a listing of our affiliates, please go to www.torstar.com and click on Torstar Properties, or call Customer Service at 705.726.0573 x303 for information.

This Privacy Code is available to the public in electronic form located at www.simcoe.com and in paper form from 21 Patterson Rd., Barrie Ont, Canada L4N-7W6 Attn Privacy Office. If you have any additional concerns or questions, we encourage you to contact us and we will address your concerns to the best of our ability. **Please read this Privacy Code carefully, and check back periodically as we update it from time to time. By submitting your personal information to us, you signify your agreement to the terms and conditions of this Privacy Code.**

What is personal information? Personal information is any information about an identifiable individual. Personal information does not include the name, title, business address or telephone number of an employee of an organization. Information used solely for journalistic purposes is exempted from the Act.

We are responsible for personal information under our control. Our employees are informed about the importance of privacy and receive periodic information to update them about our Privacy Code and related policies. In addition, Torstar Corporation, our parent company, has appointed a Chief Privacy Officer to oversee personal information-handling practices of **Metroland North Media** and its affiliates.

Children: If you are under 18, be sure to obtain your parent or guardian’s permission before you send any personal information to us, or anyone else, over the Internet. We encourage parents to get involved with their children’s online usage and to be aware of the activities in which they are participating. **[NOTE: ADDITIONAL LANGUAGE SHOULD BE USED IN THE CASE OF ANY DELIBERATE COLLECTION OF PERSONAL INFORMATION FROM CHILDREN. SEE STAR POLICY.]**

What personal information do we collect, and why? We collect personal information for specific, limited purposes. Information is collected by fair and lawful means.

We collect personal contact information (for example, name, address, email address and telephone numbers) if you: sign up for a newsletter; subscribe to a newspaper; register on an online forum or website, or to attend a paid event; purchase any product from us; are a classified advertiser or auction participant; or provide it to us when you attend a trade or consumer show. This information is used to fulfill your request, provide targeted advertising and respond to your inquiries. From time to time it may be used to provide reward points or apply credit, as applicable in the circumstances.

We retain your subscriber ID and passwords so that upon request by you and receipt of identification we may remind you of them.

If you enter a contest or other promotion, we use your personal contact information to administer the contest

or promotion including contacting, announcing and promoting prizewinners.

We collect demographic information, as well as purchase history and a list of promotions offered to you (“history”), in order to gain a better understanding of your interests so that we may develop better products and services, and to determine eligibility for our products and services.

We may also use demographic, personal contact and history information from time to time to contact you about changes, enhancements or other notices related to goods or services you requested and which we provide. In addition, we may use this information to send you offers or information from us, our affiliates and from selected sponsors or advertisers (“Marketing Offers”). If you do not wish to receive Marketing Offers, you may opt-out at any time by following the procedure set out in our opt-out policy (see below).

We keep notes and special instructions on file for classified advertisers and subscribers to help us fulfill your request and provide customer service. We may tape or monitor your telephone calls with our customer service representatives for quality assurance purposes.

We collect credit card information if you: subscribe to a newspaper; register on a paid website; enter a paid contest; register to attend a paid event; purchase any product from us; are a classified advertiser or an auction participant. This credit card information is used for the purpose of fulfilling your order.

If you choose to opt-out of any use of your personal information in accordance with our opt-out policy, we keep your contact information on a list so that your request can be honoured. If you complain to any of our departments, we collect your contact information and the nature of your complaint, for the purpose of investigating and responding to you.

If you are a freelancer, or other service provider, we collect your social insurance number for tax reporting purposes and your contact information in order to pay you. We may also collect financial information from freelancers or other service providers and from advertisers (for example, banking details and credit history) to assess credit risk, sales data to prepare royalty reports and other information to help us evaluate your services.

If you use any of our websites, we may assign an internet cookie. An internet cookie is a small text file that a website stores on your internet browser and that can collect and store information. We use cookies to better understand how you use our websites, to make sure our ads and dynamic content are served correctly and to improve the performance of our websites. For example, a cookie may recall a set of preferences you have set for our website and record items that you have registered for. Storing cookies on your web browser allows us to present you with custom web pages and other content that are tuned with your preferences. For example, if you are a registered user, you may see a welcome page with your name on it. These activities are invisible to you, and are generally intended to improve your internet surfing convenience. Unless you have set your preferences so that you will be alerted when a cookie is being stored on your computer, you won’t know about it.

If you are concerned about cookies, it is possible to turn them off in your web browser preferences. However, please be aware that by disabling cookies, you may not be able to use all portions of our websites, particularly pages requiring registration.

We may place advertising or other links on our sites that originate from outside advertisers. If you view these ads, the advertisers may assign a cookie. We do not control these cookies, nor are we responsible for any marketing or other use of your name by these advertisers.

- We generally use your personal information for the purposes of: managing, administering, collecting or otherwise enforcing accounts; maintaining business records for reasonable periods of time and generally managing and administering our business; and meeting regulatory, legal, insurance, audit, security and processing requirements.

Occasionally, we ask our customers to complete market research surveys. Survey results are aggregated and shared with our advertisers, sponsors and affiliates in a manner that does not disclose personal information. Other than as permitted or required by law, purposes for the collection, use or disclosure of personal information, which are not set out in this Privacy Code, will be set out at the time of collection. You will be given a reasonable opportunity to opt-out of any additional purposes no later than the time of collection.

To whom do we disclose personal information, and why? We may disclose your personal information under the following circumstances:

In order to provide you with Marketing Offers (see above), we may disclose your personal contact information to affiliates and selected sponsors and advertisers. If you do not wish to receive Marketing Offers, you may opt-out at any time by following the procedure set out in our opt-out policy (see below). We may transfer your personal information to service providers acting on our behalf in order to perform

processing and other specialized services, for example, prize fulfillment of our contests, collection of overdue accounts, product delivery, or credit card processing.

We may disclose your personal information to our affiliates for internal audit, management, billing, administrative or other business purposes.

We may disclose your contact information on a confidential basis to our advertisers for the sole purpose of newspaper delivery verification.

When we need to disclose your personal information to unrelated parties, for example, if we find you have violated any stated terms of service or conditions of purchase, or if we need to comply with applicable laws and lawful governmental requests, other legal and regulatory authorities and other legal reasons.

We may disclose your personal information to parties connected with the contemplated or actual financing, insuring, sale, assignment or other disposal of all or part of our business or assets, including for the purposes of determining whether to proceed or continue with such transaction or business relationship or fulfilling any records or other reporting requirements to such parties. We will require such parties to treat your personal information in accordance with this Privacy Code and to use and disclose it only for the purposes for which it was collected.

Consent and opt-out policy. In general, we seek consent to use your personal information in accordance with our opt-out policy. Except as set out in this section, we obtain your express opt-in consent to use or disclose sensitive personal information.

If you do not wish to receive Marketing Offers, you may opt-out at any time by doing any of the following:

follow the instructions at the bottom of any email Marketing Offer you receive.

inform your telemarketer at the time you are called with a Marketing Offer.

call Customer Service at 1-800-387-0668 and request that your personal information not be used for Marketing Offers.

email Customer Service at privacy@simcoe.com and request that your personal information not be used for Marketing Offers.

Please allow a reasonable time (approximately 2-4 weeks) for processing of your request.

Generally, by providing us with your personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Privacy Code, if applicable, or otherwise at the time of collection. We reserve the right to use and disclose your personal information without consent where required or permitted by law, for example, if we have reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law, in order to protect or defend our legal interests, or to comply with applicable laws and lawful governmental requests.

Safeguards: We maintain personal information in a combination of paper and electronic files. We take technical, contractual, administrative and physical security measures to protect your personal information. When you provide credit card information to use, we work to help protect the security of your credit card information by using industry standard secure sockets layer (SSL) encryption technology.

Please be aware that email is not a secure medium, and any personal information you send to us by email could be intercepted. If your communication is very sensitive, or includes information such as your credit card number, you should not send it electronically unless the email is encrypted or your browser indicates that the access to our website is secure. Materials posted to online forums such as bulletin boards or chat rooms are public, not secure and may be viewed by anyone. Any personal information you post may be collected and used by anyone and may result in unsolicited messages from other internet users.

How to access and correct your personal information. We provide you with the means to access, update, edit or delete certain subscriber or registration information you have provided at any time by going to the appropriate page on www.simcoe.com and changing or deleting such information as desired. Alternatively, you may call Customer Service at 705.726.0573 x303 and we will make the changes upon receipt of appropriate evidence.

We will give you access to the information we retain about you within a reasonable time, upon written request, satisfactory identification and proof of entitlement. In some cases, we may not provide access to

personal information in our possession or control. If we deny your request, we will advise you in writing of the reason for the refusal and you may challenge our decision.

How to challenge our privacy practices. We encourage you to contact us with any questions or concerns you have about your privacy or this Privacy Code. If you have a question concerning our Privacy Code, would like a copy, or if you have a complaint, please contact Customer Service at:

**21 Patterson Rd. Barrie
Ontario, L4N-7W6
705.726.0573 x303
fhaller@simcoe.com**

Customer Service can successfully deal with many issues. If you prefer, or if after contacting Customer Service, your concerns or questions have not been resolved to your satisfaction, you can contact Torstar Corporation's Chief Privacy Officer in writing as follows:

Chief Privacy Officer Torstar Corporation One Yonge Street, 6th floor Toronto ON M5E 1P9 Fax: (416) 869-4183

This Privacy Code was last updated on March 7, 2007.