

Introduction

Effective January 1, 2004, private sector organizations must follow a code for the protection of personal information in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA).

A full list of SaltWire Network Inc. publications is available by visiting <u>saltwire.com</u>.

Customer Personal Information Defined

Personal information includes any factual or subjective information about an identifiable individual. For SaltWire Network Inc. publications' purposes this includes but is not limited to name, address, telephone number, comments, transactions, credit information, Visa, MasterCard or banking information.

Personal information does not include that which is collected for journalistic purposes or that information that may be contained in a business card, such as the name, title, business address and telephone number of an employee of an organization.

Ten Principles of Fair Information Practices

There are ten (10) principles of fair information practices. These principles form the ground rules for the collection, use and disclosure of the personal information of our customers. As a private sector organization, we are responsible for the protection of personal information and the fair handling of that information at all times.

The ten (10) principles that SaltWire Network Inc. publications must follow are:

1. Accountability

SaltWire Network Inc. publications are responsible for personal information that is under its control. The individual responsible for SaltWire Network Inc. publications' compliance with respect to the principles of fair information practices is Sheryl Grant, Senior Director of Digital Content. SaltWire Network Inc. publications are responsible for personal information in its possession, including information that has been sent to a third party for processing. SaltWire Network Inc. publications shall use contractual means to provide a comparable level of protection while the information is being processed by a third party.

2. Identifying Purposes

SaltWire Network Inc. publications shall identify the purpose for which personal information is collected at or before the time that the information is collected. In compliance with the Openness principle and the Individual Access principle, purposes for which personal information is collected include but are not limited to:

- To communicate delivery information to a newspaper carrier;
- To process payment of a Classified advertisement, a newspaper subscription in either hard-copy or on-line version, archived information in CD-ROM form, reprinted newspaper photographs;
- To communicate subscription renewal or other information to the customer.
- In accordance with the Limiting Collection principle, only that information necessary to fulfill the identified purposes shall be collected.

The identified purpose should be specified to the individual from whom the information is collected at or before the time the personal information is collected.

This may be done orally or in writing.

When collected personal information is to be used for a new purpose not previously identified, the new purpose shall be identified prior to use of the information. Unless the new purpose is required by law, consent of the individual is required before the information can be used for that purpose.



Whoever is collecting the personal information should be able to explain the collection purpose to the individual from whom the information is collected.

3. Consent

Consent and knowledge of the individual is required, except where inappropriate, for the collection, use and disclosure of their personal information.

Except for purposes provided for in exceptions to consent, personal information may not be collected, used, or disclosed without knowledge and consent of the individual.

A reader who enters a newspaper contest would reasonably expect that his or her relevant contact information would be collected and used to identify the reader if and when he or she was selected as a contest winner. The reader would not reasonably expect that this information would be used for a purpose other than the administration of the contest without the reader's knowledge and consent.

A newspaper subscriber would reasonably expect that SaltWire Network Inc. publications, in addition to using the individual's name and address for mailing and billing purposes, would also contact the subscriber to solicit the renewal of his or her subscription.

Exceptions to consent include:

- If it is clearly in the individuals interest and consent is not available in a timely manner;
- If knowledge and consent would compromise the availability or accuracy of the information and collection is required to investigate a breach of an agreement or contravention of a provincial or federal law;
- For journalistic, artistic or literary purposes;
- If the information is publicly available;
- To collect a debt the individual owes to a SaltWire Network Inc. publication;
- To comply with a subpoena, warrant or court order;



- To a government body that suspects the information relates to national security or the conduct of international affairs or for the purpose of administering any provincial or federal
- In an emergency where an individual's life, health or security are threatened.

 Consent may be obtained orally when information is collected over the telephone, in writing or in person.

We collect, use and disclose your personal information with your consent or as permitted or required by applicable law. Your consent may be express or implied, depending on the circumstances and applicable laws. If you provide personal information about another person to us, we assume you have the valid consent of that individual to enable us to collect, use or disclose such information in accordance with this Privacy Policy.

Any electronic communication that we may send to you, whether on our behalf or on behalf of our third party business partners, will include instructions on how to unsubscribe from any such future communications as per Canada's Anti-Spam Legislation (CASL).

4. Limiting Collection

SaltWire Network Inc. publications will limit collection of personal information to that which is necessary for the purpose of collection and shall do so using fair and lawful means.

SaltWire Network Inc. publications shall not collect personal information indiscriminately. SaltWire Network Inc. publications will not deceive or mislead customers about the reasons for collecting their personal information.

The amount and type of information gathered will be limited to that which is necessary in order to fulfill the identified purpose.



5. Limiting Use, Disclosure and Retention

SaltWire Network Inc. publications shall not use or disclose personal information for any purpose other than that for which the information was collected unless consent is provided by the customer or the use or disclosure is authorized by the Act.

Use of Personal Information

The information shall not be used for purposes other than those made known at the time of collection of the personal information. Personal information that has been collected during the course of past activities does not need to be recollected. In order to continue to use or disclose it, however, consent is required. Customers must be notified about what is done with their information, to whom it is disclosed and they must be given the option to object to these ongoing uses or disclosures.

Disclosure of Personal Information

Personal information may be disclosed only for the purpose for which it was collected. SaltWire Network Inc. publications may disclose the contact information of their customers to a third party for the following purposes:

- To facilitate newspaper delivery;
- To encourage subscription renewal;
- To prepare bulk mailings of information to customers pertinent to their newspaper delivery or newspaper subscription;
- To third party service providers communicating with customers, on behalf of SaltWire
 Network Inc. publications, regarding their subscription account status.
- Such third parties shall be contractually bound to protect this personal contact information in accordance with the policies and procedures of SaltWire Network Inc. publications.

SaltWire Network Inc. publications will not sell, lease or trade the personal information of their customers to third parties unless express consent is obtained from the customer.



Retention of Personal Information

A customer is no longer a customer seven years past their most recent business transaction and their personal information will be destroyed in accordance with the Safeguards principle.

6. Accuracy

SaltWire Network Inc. publications will keep personal information as accurate, complete and upto-date as is necessary and will take into account its use and the interests of the customer.

Personal information will not be routinely updated and will be updated only when necessary in order to fulfill the identified purpose or upon request by the customer.

Unless there are clearly set out limits, frequently used information will be kept as accurate and upto-date as is necessary for the identified purpose.

7. Safeguards

Personal information of customers shall be protected regardless of its format. SaltWire Network Inc. publications shall safeguard the information from unauthorized access, disclosure, copying, modification, loss or theft.

If necessary to transport personal information, it shall be contained in a sealed envelope and transported personally. Interoffice mail distribution is not acceptable.

Credit cardholder data received by regular mail shall be processed in a restricted area and only authorized staff may access this data.

Credit cardholder data may be received by fax machine to a fax machine located in a restricted area with limited authorized access. Authorized staff must be accountable for all documents containing cardholder information.



Telephone orders that include credit card payment are permitted; however, telephone representatives must not record the credit cardholder information in any form other than that necessary to process the payment. If recorded in hardcopy form, the form must be appropriately destroyed upon processing of the payment.

Personal information shall be stored in locked cabinets or password protected electronic files at all times unless it is being used for an identifiable purpose.

No personal information shall be left unattended at any time that it is not contained within a locked cabinet or password protected electronic file.

Personal information may be kept only as long as necessary to satisfy the purpose for which it was collected.

All hard-copy reports or documents containing customer information shall identify the customer only by an account number.

Destruction of Personal Information

All hard-copy forms, records, papers or other document containing personal information shall be shredded once the information is no longer required for an identified purpose.

All computerized records containing personal information shall be purged once the information is no longer required for an identified purpose.

Access to Personal Information

Access to customer personal information is on a "need-to-know" basis only. Personal information that has no relevance to the transaction is to be masked or removed when copies of information is provided to others.



8. Openness

SaltWire Network Inc. publications shall make its privacy policy understandable and easily available to its customers.

The following information will be readily available on the saltwire.com website:

- The name, title and address of SaltWire Network Inc. publications' privacy compliance officer;
- A copy of SaltWire Network Inc. publications' Privacy Policy;
- The name, title and address of the person to whom access to information requests should be sent:
- The procedure for a customer to gain access to their personal information;
- A description of that personal information which is made available to third parties and the purpose for which it is disclosed.

9. Individual Access

Upon request, the customer shall be informed of any personal information we have about them as well as its use and disclosure. An opportunity shall be extended to correct or amend any personal information if its accuracy and completeness is challenged or incorrect.

Except when SaltWire Network Inc. publications are required by law to not disclose personal information to the individual, should a customer request a copy of their personal information, the request shall be complied with within thirty days. The 30-day response time limit may be extended if: responding to the request within the original 30 days would unreasonably interfere with SaltWire Network Inc. publications' business activities; if additional time is necessary to convert the personal information to an alternate format; or, if additional time is necessary to conduct consultations. If an extension to the original 30 days is required, SaltWire Network Inc. publications will notify the customer of their right to complain to the Privacy Commissioner of Canada.



Access to a customer's personal information shall be provided at minimal or no cost. If cost is necessary, the customer will be advised of the approximate cost prior to processing the request. In order to ensure that information within a customer record is easily understood, any acronym, abbreviation or code used within the customer's personal information shall be explained to the customer.

Where appropriate, amended customer information will be forwarded to any third party that has access to the information.

If it is necessary to refuse access, the customer will be informed in writing and will be advised of reasons and any possible recourse.

SaltWire Network Inc. publications must refuse access to personal information in the following circumstances:

- If it would reveal personal information about another individual that cannot be removed unless consent is provided by the other individual or if a life-threatening situation exists;
- If a SaltWire Network Inc. publication had disclosed information to a government body
 for law enforcement or national security reasons and that body has instructed a
 SaltWire Network Inc. publication to refuse access or to not reveal that the information
 has been released;
- Solicitor-client privilege;
- If it was collected without the individual's knowledge or consent to ensure its availability and accuracy and the collection was required to investigate a breach of an agreement or contravention of a provincial or federal law;
- If the information was generated in the course of a formal dispute resolution process.

10. Challenging Compliance

A customer may address a challenge concerning compliance with the principles of the Personal Information Protection and Electronic Documents Act (PIPEDA) to SaltWire Network Inc. publications' privacy compliance officer.



The customer shall be made aware of SaltWire Network Inc. publications' Privacy Policy and that it is in place for protection of their personal information. The customer shall be offered a copy of this policy.

The customer shall be provided with the name, title and address of the person accountable for SaltWire Network Inc. publications' privacy policies and practices. This person is presently Sheryl Grant, Senior Director of Digital Content, SaltWire Network Inc., P O Box 610, Halifax, NS, B3J 2T2. Phone: (902) 426-2811, Fax: (902)426-0449, Email: sgrant@herald.ca.

All complaints shall be investigated and the customer will be advised of the outcome. If a complaint is justified, SaltWire Network Inc. shall take appropriate steps to resolve the complaint including but not limited to amendment of SaltWire Network Inc. publications' policies and procedures.

In the event the complaint is not resolved to the customer's satisfaction, the customer may have recourse to additional remedies through the Office of the Privacy Commissioner of Canada, 112 Kent Street, Place de Ville, Tower B, 3rd Floor, Ottawa, Ontario, K1A 1H3, or toll-free at 1-800-282-1376, www.priv.gc.ca/.

Collection and Use of Cookies

A cookie is a small text file, which often includes an anonymous unique identifier, that is sent to the user's web browser from a website's computers and is stored on the user's computer's hard drive. Cookies cannot be used to run programs or deliver viruses to a user's computer.

SaltWire Network Inc. publications may use cookies to:

• Improve the operation and performance of their respective websites to make them easier and more convenient to use. For example, cookies help SaltWire Network Inc. publications to provide more personalized services by recalling user preferences on subsequent visits (e.g. relevant advertising). Cookies also allow SaltWire Network Inc. publications to save passwords and preferences for a user so that the user will not have to re-enter them on the next visit to a SaltWire Network Inc. publication website;



- Measure aggregate user traffic and demographic statistics related to SaltWire Network Inc. publications and advertisements (e.g. number of users, average time spent, average age and similar statistics). This information helps SaltWire Network Inc. publications to better understand when to update, change or offer new services and provides SaltWire Network Inc. publications with details as to the performance of Third Party advertisements and content. This information may be reported, in aggregate form only, to SaltWire Network Inc. publications' current and prospective sponsors, advertisers and business partners. No Personal Information will be disclosed in such reports;
- Display advertisements. SaltWire Network Inc. publications and Third Party advertising providers may use cookies when serving advertisements on SaltWire Network Inc.'s publication websites. Anonymous data based on cookies and user IP Addresses may be used to deliver advertisements that are likely to be of interest to the applicable users ("Interest-based Advertising"). In some cases, advertisements from Third Party advertisers are delivered to users (in conjunction with SaltWire Network Inc. publications) by such Third Party advertisers, or by separately contracted advertising providers on their behalf, and not by SaltWire Network Inc. publications; as such, the Third-party advertisers' use of cookies is subject to their own privacy policies, not that of SaltWire Network Inc. publications, and users should consult the privacy policies of such Third Party advertisers.

Most browsers are initially set up to accept cookies. If a user prefers, the user can reset his/her browser either to notify the user when the user has received a cookie, or to refuse to accept cookies. The user should understand that while SaltWire Network Inc. publications do not require a user to use cookies, certain aspects of their websites will not function properly if a user sets his/her browser to not accept cookies.

