



P R I V A C Y P O L I C Y

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PART I. INTRODUCTION

CLICKOM Inc. respects each individual's right to personal privacy. We will collect and use information through our Web site only in the ways disclosed in this statement. This statement applies solely to information collected at www.clickom.ca web site.

PART II. DEFINITION

PERSONAL INFORMATION

Personal information means recorded information about an identifiable individual.

CONFIDENTIAL INFORMATION

Means any information or material relating to the business and affairs of CLICKOM Inc. or any of its affiliates, and that results in, or would reasonably be expected to result in, a change in the way CLICKOM conducts its business and/or may impact the value of any of its assets.

SERVICE

Means any of the business commitment or their outcome, as listed in the Master Service Agreement, and which would reasonably be expected by the Client.

CLICKOM

CLICKOM is used to refer to any of the followings: CLICKOM Inc. or the owner and publisher of this document.

CLIENT

Client is used to refer to any entity with whom CLICKOM has signed a service agreement.

THE POLICY

This document

PART III. PURPOSE OF THIS POLICY

This document, The Policy, sets out CLICKOM's policies and practices on management of personal information. The objectives of The Policy are:

- i. to disclose information in a timely, consistent and appropriate manner;
- ii. to securely disseminate confidential information pursuant to all applicable legal requirements;
- iii. to educate CLICKOM INC. staff members on the appropriate use and disclosure of personal information and Company confidential information;
- iv. to foster and facilitate compliance with applicable laws;
- v. to ensure complaints are handled in a timely and responsible manner;
- vi. to maintain public confidence regarding privacy protection while service is delivered.

PART IV. SCOPE OF THE POLICY: AUDIENCE

This Policy applies to all CLICKOM Inc. staff members and people engaging in any business or professional activity with, or on behalf of CLICKOM Inc. or any of its Subsidiaries.

PART V. INFORMATION COLLECTION

This section describes the type of information CLICKOM collects, the context of this process and the purpose for which such information is collected.

V.1 CONSENT

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information. CLICKOM Inc. will therefore invite you to agree for the collection of your personal information, prior to any service being delivered. By agreeing to provide personal information, you also agree that

- a) CLICKOM Inc. may collect, use and disclose your Personal Information in accordance with this policy; and
- b) You or your representatives are authorized to provide us with your Personal Information.

Notes Certain services can only be offered if you provide Personal Information to CLICKOM Inc. Consequently, those services will not be offered if you and your representative(s) choose not to provide CLICKOM with the required Personal Information. CLICKOM Inc will always inform you when personal information is required to ensure service delivery.

Your consent may not be required for other services such as surveys.
Your consent will not be requested to collect standard traffic information.

V.2 TYPE OF INFORMATION COLLECTED

PERSONALLY IDENTIFIABLE DATA

The personally identifiable information we ask you to provide may include the following:

- Name
- Address & Postal/Zip code
- Telephone, fax, cellular, etc. numbers
- Occupation or Professional designation
- E-mail address(es)
- Credit card number and expiration date (for online purchases or donations)
- Name of organization (where applicable)

TRAFFIC DATA

We may also automatically collect data specific to you, when you visit our web site. Please note that such information doesn't allow identifying you personally and is almost standard traffic data related to Internet browsing. This information may include the following:

The type of computer, browser and web services you are using. We may also know the date, time, and pages you visited. Collecting this information helps us design the site to suit your needs and to improve site security.

SURVEY INFORMATION

CLICKOM Inc may from time to time, conduct surveys aiming to improve customer service. In such cases, we will explicitly request additional and potentially identifiable personal information from our visitors, about themselves or other people [such as referrals or gift purchases, demographic data, education, etc.].

CLICKOM Inc. does not actively market to children, and will never knowingly ask individuals under eighteen (18) years of age, to divulge personal information. CLICKOM will securely discard information which was inadvertently collected from any individual under eighteen (18) years of age.

All information is collected through web forms and automatic logging files available on our corporate web site. Except for standard internet traffic data, the information is collected voluntarily.

V.3 ACCURACY

Personal information shall be accurate and as up-to-date as necessary to fulfill the purposes for which it is collected. CLICKOM Inc. will perform basic check, which will never alter data entered, to verify and confirm the accuracy of the data collected. It is however your responsibility to ensure that all information is entered correctly and accurately to ensure delivery of the proper service.

PART VI. INFORMATION SECURITY

VII STORING PERSONAL INFORMATION

Personal information is kept secured at all times. Here are few standards to which all staff must comply when handling personal information.

- i. Personal information and other confidential information repositories are located in a safe place to which access is restricted to individuals who need to know that information
- ii. Confidential and personal data should not leave CLICKOM Inc premises, unless this is required to provide the service(s) for which such information was provided.
- iii. All information leaving CLICKOM premises by either means, must be encrypted, password protected or under lock (for hard copy documents).
- iv. When not in use, hard copy personal information must be stored in lockable file cabinets (i.e. even in secure areas) and all electronic information must be password-protected.
- v. Documents and files containing confidential information should be identified as such

- vi. Confidential information should not be discussed in places where the discussion may be overheard, such as elevators, hallways, subways, restaurants, airplanes or taxis.
- vii. Transmission of documents by electronic means, such as fax or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions.
- viii. When copied, extra copies of documents containing confidential information should be shredded or otherwise securely destroyed.
- ix. All employees must maintain a clean desk policy.

VI.2 CIRCULATING OR DISCLOSING PERSONAL INFORMATION

CLICKOM Inc. request all its staff members to always consider what a reasonable person's expectation would be respecting use and disclosure of his or her personal information. Below are few elements to consider, when disclosing personal and confidential information:

- c) Disclose confidential information only when the disclosure is consistent with the purpose(s) for which it was collected
- d) Disclose confidential information to others only on a need to know basis where they require the information to perform their assigned duties and responsibilities.
- e) to a contractor only when a contract is in place requiring the contractor to meet personal information-handling and security standards
- f) Refer to the Manager of Communications, before disclosing any information to selected authority and to the media.

PART VII. INFORMATION USAGE

The purposes for which personal information is collected will always be identified at or before the time the information is collected. The information collected by CLICKOM Inc. will be used for the purpose of providing secured online e-commerce type of transactions, as those are specified in the Master Service Agreement signed with the client. However, the main purposes of collecting information are

- g) to allow identification and ensure legitimate service delivery
- h) to provide historical and factual data in the event of a dispute in regard to a service
- i) to provide historical and factual data in the event of complaint about service delivery
- j) to confirm with service delivery standard, when applicable.

The information we collect will not be used to create customer profiles based on browsing, donating or purchasing history.

We will not supplement information collected at www.clickom.ca web site with data from other sources [such as credit history to authorize purchases].

We may share data with the following third parties:

- k) mandated investigator in the event of a dispute or complaints, for the only purpose of identifying the cause[s] of the issue and applying appropriate correction[s]
- l) Any designated person to whom you have explicitly provide us with consent or a request to disclose you personal information.

If our policy on information collection or uses changes, we will advise you by posting an icon indicating that they are changes to our privacy policy. This icon will remain visible for approximately 30 days. Otherwise, we always invite our visitor and clients to visit our privacy policy online and, please inform us of any question or concern you may have after reading this document.

PART VIII. ACCESS AND AMENDMENT TO YOUR PERSONAL INFORMATION

VIII.1 ACCESS TO PERSONAL INFORMATION

Decisions and services are rendered based on the information in our databases. It is therefore important that your Personal Information be accurate and complete. We strongly encourage you, as a customer of CLICKOM, to periodically request access to your Personal file and to ensure the information we hold is complete and accurate. You may request access to your personal file at all time, by sending a request to our Privacy Office at privacyofficer@clickom.ca.

VIII.2 AMENDMENT TO PERSONAL INFORMATION

Should you identify any incorrect or out-of-date information in your file, please immediately request that correction(s) be made. Where appropriate, we will communicate those changes to other parties who may have unintentionally received incorrect information from us. However, before making any changes to your file, we will need to verify and confirm your identity. You will therefore be required to provide some personally identifying information.

Please submit your request to privacyofficer@clickom.ca.

PART IX. PRIVACY BREACH

A privacy breach occurs when personal information is inappropriately disclosed (for example, a letter containing an individual's personal information is sent in error to another individual).

A privacy breach must immediately be brought to the attention of the Privacy Officer, who will determine means to notify the person concerned.

PART X. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We are committed to properly secure the information we collect online. To help us accomplish this, we take the following steps:

- i. We employ internal access controls to ensure that the only people who see your information are those with a need to do so to perform their official duties;
- ii. We train relevant personnel on our privacy and security measures;
- iii. We physically secure the areas where we hold hard copies of the information we collect online;
- iv. We regularly back up the information we collect online to insure against loss;

- v. We use technical controls to secure the information we collect online as appropriate, including but not limited to: Secure Socket Layer (SSL), encryption, firewalls, password protections:
- vi. We periodically test our security procedures to ensure personnel and technical compliance.

Personal information that is no longer required is shredded or erased in a secure manner.

PART XI. PROBLEM RESOLUTION

If problems arise, please contact the Privacy Officer at CLICKOM Inc. by any of the means listed below:

privacyOfficer@clickom.ca

We are committed to respond to your request within the next business day.

PART XII. HOW YOU CAN PROTECT YOUR INFORMATION

We do our utmost to protect and safeguard your Personal Information. We believe there are measures you should take as well. The following is a list of things you can do to protect yourself against fraud and uninvited intrusion.

XIII.1 PASSWORD

Passwords are necessary to identify you and authenticate your permission to access your online accounts. The passwords you use are encrypted. Encryption is presently the most effective way to achieve data security. Just as it is important for us to employ strict procedures to safeguard your information, you also should take precautions in handling your passwords. When selecting a password, we suggest that you use a combination of letters and numbers and do not use words that can be easily associated with you such as the name of a family member, a pet or the street on which you live. We also suggest that you change your password regularly.

XIII.2 PERSONAL INFORMATION

You should not share personal information with others unless you clearly understand the purpose of their request and you know who you are dealing with.

XIII.3 YOUR ONLINE SECURITY

To make sure your connection to the protected areas of the CLICKOM websites is secure, look for either a 'closed lock' or an 'unbroken key' icon located at the bottom right hand side of your browser's task bar. You may also check the Address bar to determine if SSL (Secure Socket Layer) is active by looking at the beginning of the address. If it starts with "https" rather than the standard "http", then SSL is operating.

Empty your browser's cache after each session.