

[LEGAL BUSINESS UNIT NAME]
Privacy Policy
(the "Privacy Policy")

Updated: January 19, 2012

Gardewine Group Inc. and its related companies (collectively, "**Gardewine**") consider matters relating to the protection of your personal information and your privacy to be extremely important. **Gardewine** has created and implemented this Privacy Policy so that you understand how your personal information may be utilized and how it is protected. **Gardewine** encourages you to review this Privacy Policy. By providing personal information to us and by dealing with **Gardewine**, we will assume that you have consented to the collection, use and disclosure of your personal information in accordance with the terms set out in this Privacy Policy unless you advise us otherwise. If you have questions regarding this Privacy Policy or our privacy practices then please contact our Privacy Officer, whose contact information is set out at the bottom of this Privacy Policy.

Our Commitment

Except as otherwise provided in this Privacy Policy, **Gardewine** will not sell, rent, loan, trade, lease, transfer or otherwise disclose your personal information, including e-mail addresses, to any third party.

Amendments to this Privacy Policy

Gardewine reserves the right to amend this Privacy Policy from time to time. The first paragraph of this Privacy Policy indicates when the Privacy Policy was last amended. Please check back regularly for changes.

Definitions

In this Privacy Policy, the following term has the following meaning:

"**Personal information**" means information about you. Personal information does not include information that cannot be attributed to you. For example, information of an aggregate or anonymous nature is not personal information under this Privacy Policy and, therefore, is not subject to the terms of this Privacy Policy.

Consent

When you voluntarily provide information for a specific purpose, we will assume your implied consent to the collection, use or disclosure of your personal information for that particular purpose. If we wish to use your personal information for a different use or disclosure, we will generally obtain your additional consent.

Changing Consent

You may change or withdraw your consent at any time on reasonable notice, subject to pre-existing legal and contractual obligations, by sending an e-mail to the Privacy Officer. However, if you withdraw certain consents, it may limit the manner in which you can make use of **Gardewine**'s services. For clarity, your ability to change or withdraw consent is not absolute. **Gardewine** reserves the right to continue handling your personal information in those circumstances required or permitted by law despite a change or withdrawal of consent.

Collection

When obtaining your consent we will inform you of the uses and disclosures that we wish to make of your personal information unless those uses and disclosures are readily apparent at the time we collect the personal information or are set out in this Privacy Policy.

Use

Except as otherwise provided in this Privacy Policy, we will obtain your explicit or implied consent to use your personal information in a particular manner. Set out below are certain circumstances where we may use your personal information without obtaining your further consent. These are:

- using identification information and contact information, such as your name, address, telephone number and e-mail address so that we can identify you and deliver the services that you request and to communicate with you regarding those services;
- using information relating to your preferences so that we are able to deliver our services to you in accordance with those preferences;
- using customer relationship information such as your service requests, comments and feed back to assist us in delivering services in accordance with your wishes;
- using personal information for the purpose for which it was provided and certain other activities that are reasonably ancillary to that purpose. For example, if you apply for a job, we will review the information provided to assess your suitability for the job. As well, we will use your contact information to contact you if we need further information or if we would like to set up an interview;
- using your postal and/or e-mail address to provide to you information about **Gardewine's** services and other items (including the services of third parties) that **Gardewine** believes that you may be interested in notwithstanding that your address may have been provided for a different purpose;
- analyzing your personal information to assist us in developing and enhancing our services and our website; and
- analyzing your personal information to assist us in conducting market analysis and strategic planning.

Except as otherwise provided in this Privacy Policy, **Gardewine** will not use your personal information for any other purpose.

Disclosure

Except as otherwise provided in this Privacy Policy, we will obtain your explicit or implied consent prior to disclosing your personal information to a third party. Set out below are certain circumstances where we may disclose your personal information without obtaining your further consent. These are:

- In the event **Gardewine** transfers or is considering transferring control of any or all of its operations or services to another organization, **Gardewine** reserves the right to transfer and disclose your personal information to that organization. However, **Gardewine** will require that the organization agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose your personal information as **Gardewine** is similarly entitled under this Privacy Policy;

- In the event **Gardewine** amalgamates with another organization, **Gardewine** reserves the right to permit that amalgamated organization to continue to use and disclose your personal information. However, **Gardewine** will require that the amalgamated organization agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose your personal information as **Gardewine** is similarly entitled under this Privacy Policy; and
- **Gardewine** may work with other organizations towards some common purpose consistent with the objectives of **Gardewine**. In that case, it may be necessary for **Gardewine** to disclose your personal information to these organizations. However, **Gardewine** will require that these organizations agree that they will only use and disclose your personal information as necessary for the common purpose and that they will adhere to the terms of this Privacy Policy.

Service Providers

Gardewine may engage certain service providers. Those service providers may provide services to **Gardewine** to assist **Gardewine** in its activities. Other service providers may provide services directly to you at the request of **Gardewine**. As such, it may be necessary for **Gardewine** to disclose your personal information to these service providers. However, **Gardewine** will take steps to ensure that these service providers will only use and disclose your personal information as necessary to provide the services and that they will adhere to the terms of this Privacy Policy or their own similar privacy policy. As well, some of these service providers may assist **Gardewine** in the collection of your personal information. **Gardewine** will ensure that they will not use or disclose your personal information for any other purpose and that they will adhere to the terms of this Privacy Policy or we will require that they have a similar privacy policy.

Other Collection, Use and Disclosure

As well, privacy legislation permits or requires the collection, use and disclosure of personal information without the knowledge or consent of the individual in some specific and limited circumstances. We reserve the right to collect, use and disclose your personal information in these limited circumstances without your knowledge or consent. **Gardewine** may monitor your use of its services to ensure the proper use and operation of those services. As well, we may collect, use and disclose your personal information without your knowledge or consent when that personal information is relevant to an actual or potential legal proceeding or when we are required or permitted to do so by court order, applicable law or regulatory requirements.

Use of the Website

In order to use some of the features of **Gardewine**'s website, **Gardewine** may require that you provide some personal information. [Our web server collects the domain names, IP addresses and routing information of visitors. This information is aggregated for the purposes of measuring the number of visits, average time spent on the website, pages viewed, and other similar purposes. **Gardewine** uses this information to measure the use of our website and to improve the content of our website.] A technology called cookies may be used on certain pages of our website. A cookie is a tiny element of data that a website can send to your browser, which may then be stored on your hard drive so the website can recognize you when you return. Cookies allow us to provide you with tailored information and to provide services to you via the Internet. If your browser permits, you may set your browser to notify you when you receive a cookie or to reject cookies altogether. (See the documentation provided with your Internet browser for more information on cookies and how to disable them.)

Accuracy and Completeness

When we collect, use or disclose personal information, we will make a reasonable effort to ensure that it is accurate, up to date and complete. To do so, we may need to request additional information from you or have you verify your information. If your personal information does change, we would appreciate it if you could inform us of those changes in order that your personal information in our possession remains accurate.

Retention and Destruction

For legal and business purposes we may retain your personal information for as long as it is reasonably needed. Upon expiry of the appropriate retention period, bearing in mind our reasonable legal and business requirements, your personal information will either be destroyed in a secure manner or made anonymous. You should be aware that there are legally required minimum retention periods, which **Gardewine** must and does observe.

Security of Personal Information

Gardewine recognizes its obligation to protect personal information in its possession and will make reasonable arrangements to secure that personal information against unauthorized access. These measures will be reasonable in the circumstance and may include providing access to only those individuals with a need to know the information, locked doors and/or filing cabinets and other physical and electronic security measures as well as contractual measures, such as non-disclosure or confidentiality agreements.

Requests for Access to Personal Information

On your written request we will provide you with:

- access to your personal information (if any) under our custody or control;
- information about the purposes for which your personal information under our custody or control has been and is being used by us; and
- the names of persons to whom, and the circumstances in which, your personal information has been and is being disclosed by us.

All requests may be subject to reasonable fees and disbursements. Where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to personal information. As well, all requests must be in writing. We will also require sufficient information and detail from you in order to verify your identity and to properly locate the information.

Your ability to access your personal information is not absolute. **Gardewine** reserves all rights to not provide access to personal information in the circumstances permitted by law.

Requests for Correction of Personal Information

We will correct errors or omissions in your personal information where that information is in our custody or control. We require that all such requests be in writing and signed by you. We may require sufficient information and detail from you in order to verify your identity, properly locate the information and provide a response. If you make such a request, we will either:

- correct the personal information and, if reasonable to do so, send correction notifications to any third party to whom we disclosed the incorrect information; or

- decide not to correct the personal information but we will annotate the personal information that a correction was requested but not made.

Corrections or amendments will rarely, if ever, be made to opinions, including expert or professional opinions, as opposed to factual information, which may be corrected if in error.

Limited Nature of this Privacy Policy

Nothing contained in this Privacy Policy is intended to create a contract or agreement between **Gardewine** and you and you may not rely on it as such.

Contacting or Communicating With Us

If you:

- have any questions with respect to our privacy policies or practices;
- have any questions with respect to our handling of your personal information;
- wish to request access to or correction of your personal information under our care or control;
or
- are dissatisfied with our handling of your personal information or any response we may have given,

please contact our Privacy Officer at:

Attention: Privacy Officer

Address: **Gardewine Group Inc.**

121A-31 Southridge Drive

Okotoks, Alberta

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Fax: 403-995-5296

E-mail: cdelay@mullen-group.com