



## **GENERAL PRIVACY POLICY**

*Approved by Board: September 23rd, 2020*

## **RIO2 LIMITED**

### **GENERAL PRIVACY POLICY**

**Effective**

#### **Our Commitment**

Rio2 Limited and any subsidiaries if applicable (collectively, “Rio2” or “we”) are committed to maintaining the security, confidentiality and privacy of your personal information. This document describes our general privacy policies.

#### **Scope of Policy**

This policy applies to personal information about individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities.

This policy does not impose any limits on our collection, use or disclosure of the information exempted under applicable privacy legislation, including business contact information and certain publicly available information.

#### **Changes**

We may change this Policy at any time by posting the revised policy on our website. Please check our website regularly for these changes.

#### **Accountability**

We have designated a Privacy Officer who is accountable for our compliance with this policy. The Privacy Officer’s contact information is below.

#### **Purposes**

When collecting personal information, we will state the purpose of collection and will provide, on request, contact information for the Privacy Officer who can answer questions about the collection.

We may collect various information from you, including your name, address, phone number, e-mail address, , preferred means of communication, your interaction with our website, social media sites and mobile applications (including information such as IP addresses, browser type, language, access times, referring website, etc.), and other information you provide to us.

We collect, use and disclose your personal information for the following purposes:

- to authenticate your identity;
- to operate, customize and improve our website, social media sites, mobile applications, advertisements;
- to provide newsletters, electronic messages and information you request from us;

- to manage or transfer our assets or liabilities, for example in the case of an acquisition, disposition or merger;
- to protect us, yourself and others from fraud and error and to safeguard our business interests;
- to comply with legal and regulatory requirements; and
- for other purposes we may inform you about from time-to-time.

We may transfer your personal information across provincial or national borders to fulfil any of the above purposes (including both the necessary and the optional purposes), including to service providers located in the United States and other jurisdictions outside of Canada who may be subject to applicable disclosure laws in those jurisdictions. You may contact our Privacy Officer (whose contact information is provided below) to obtain information about our policies and practices regarding our use of service providers outside of Canada, or to ask questions about the collection, use, disclosure or storage of personal information by our off-shore service providers.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is authorized or required by law.

We may work with other companies to provide services on our behalf, such as website hosting services, and news delivery services. Those service providers will be permitted to obtain only the personal information they need to deliver the service in question, and they will be required to maintain the confidentiality of that information.

### **Cookies**

We may use cookies to collect your personal information. Cookies are unique identifiers which are used to customize your website, mobile application or social media site experience. Most web browsers automatically accept cookies, but you can usually change your browser to prevent or notify you whenever you are sent a cookie. This gives you the chance to decide whether or not to accept the cookie. A cookie does not tell us who you are, your email address, or any other personal information. We use the information it provides to help us improve our website, mobile application, social media site and our services, and to provide our visitors with a better visit. Even without accepting a cookie you can still access many of the features on the site. There may, however, be limitations on your use of some site functions.

### **Consent**

We will not sell or rent your personal information to third parties, and we will obtain your consent to collect, use or disclose personal information except where we are authorized or required by law to do so without consent. For example, we may collect, use or disclose personal information without your knowledge or consent where:

- the information is publicly available, as defined by statute or regulation;
- we are obtaining legal advice; or

- we reasonably expect that obtaining consent would compromise an investigation or proceeding.

Other exceptions may apply.

Your consent can be express, implied or given through an authorized representative such as a lawyer, agent or broker.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify us that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those purposes) or otherwise.

You may withdraw consent at any time, subject to legal, contractual and other restrictions, provided that you give reasonable notice of withdrawal of consent to us. On receipt of notice of withdrawal of consent, we will inform you of the likely consequences of the withdrawal of consent, which may include our inability to provide certain services for which that information is necessary.

Any material, information or other communication (including questions, comments and suggestions) you transmit to us through our website, social media sites or other online sites, or mobile applications will be considered non-confidential and non-proprietary. We may forward your communications and other personal information to any of our offices or affiliates throughout the world in connection with any products or services you request, or in connection with any communications you wish to have with us, and you consent to us doing so.

#### **Limits on Collection**

We will not collect information indiscriminately and will limit collection of information to that which is reasonable and necessary for the above purposes. We will also collect information as is otherwise authorized by law.

#### **Limits on Using, Disclosing and Retaining Personal Information**

We will only use and disclose your personal information for the purposes set out above and as authorized by law.

We will keep personal information used to make a decision affecting you for at least one year after using it to make the decision, unless otherwise permitted or required by law.

We will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

We will take due care when destroying personal information so as to prevent unauthorized access to the information.

## **Accuracy**

We will make a reasonable effort to ensure that personal information we are using or disclosing is accurate and complete. In some cases, we rely on you to ensure that certain information, such as your address or telephone number, is current, complete and accurate.

If you demonstrate the inaccuracy or incompleteness of personal information, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, we will annotate the personal information under its control with a note that the correction was requested but not made.

## **Safeguards**

We protect the personal information in our custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

We will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services to you. However, confidentiality and security are not assured when information is transmitted electronically.

## **Providing Access**

Upon written request and authentication of identity, we will provide you with your other personal information under our control, information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed. We will make the information available within 30 days or provide written notice where additional time is required to fulfil the request.

In some situations, we may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation or where disclosure of the information would reveal confidential commercial information that, if disclosed, could harm our competitive position. We may also be prevented by law from providing access to certain personal information.

Where an access request is refused, we will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

## **Links to other Websites**

Our website, social media sites and mobile applications may contain links to websites of third parties. We are not responsible for the privacy practices or the content of those other websites.

## **Complaints**

Upon your request, we will provide information regarding our complaint procedures.

Any inquiries, complaints or questions regarding this policy or our compliance with privacy legislation should be directed in writing to our Privacy Officer as follows:

Kathryn Johnson  
Privacy Officer  
Rio2 Limited  
Telephone: 604-762-4720  
Email: [kathryn.johnson@rio2.com](mailto:kathryn.johnson@rio2.com)