

**Fastrac Mail Services Ltd.
(Fastrac)**

Privacy Policy

And

Procedures

January 1, 2004

5-6782 Veyaness Road
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Tel: 250-652-9936

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Protecting Personal and Business Information

Fastrac Mail Services Ltd. is committed to fulfilling or exceeding the Privacy standards established by the Personal Information Protection Act (PIPA-BC) of British Columbia.

Ten Privacy Principles

Our Privacy Policy, practices and actions are governed by the Ten Privacy Principles:

1. Accountability
2. Identifying Purpose(s)
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Safeguards
8. Communication of Policies and Practices
9. Individual Access
10. Process for Challenging Compliance

These principles are the founding principles of the privacy legislation in Canada, including the Federal and BC Acts. It is against these principles that a business must “measure” their Privacy Policies and Practices.

1. Accountability –responsibility

Fastrac is responsible for maintaining and protecting personal information under its control.

This includes personal information, such as mailing lists and the nature of the mailings that our clients have entrusted to us.

In fulfilling our privacy obligations Fastrac has designated its President as its Privacy Officer, who is accountable for the company’s compliance with the 10 Privacy Principles.

In respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, Fastrac’s role is that of a mail service fulfillment house (third party facilitator). Our clients provide us with the Personal Information and we utilize this information as directed by our client. We do not collect nor have title to the mailing lists or similar materials provided to us by our clients.

2. Identify Purpose(s)

The purpose or purposes for which personal information is collected must be identified at or before the time the information is collected.

In respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, it is the respective client's responsibility to ensure that the purpose or purposes for which personal information is collected is identified at or before the time the information is collected.

3. Obtain Consent

The knowledge and consent of an individual are required, for the collection, use or disclosure of personal information except where required or permitted by law.

In respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, it is the respective client's responsibility to ensure that the appropriate privacy consent principles are met.

4. Limit Collection

The collection of personal information must be limited to what is necessary for the purposes identified by Fastrac. Information shall be collected by fair and lawful means.

In respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, it is the respective client's responsibility to ensure that the personal information provided to us is limited to what is necessary and that such information has been collected by fair and lawful means.

5. Limit Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, unless with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

With respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, we ensure that the use and disclosure of personal information provided to us, is used solely for the purpose as directed by our client. It is the respective client's responsibility to ensure that such use and/or disclosure is the purpose for which it was collected. We retain such personal information for a limited period to ensure that the purpose for which Fastrac is contracted is fulfilled, a period of approximately 3 months. We do not in any form whatsoever, sell or re-distribute mailing lists or similar information that has been provided to us by clients.

6. Accuracy

Personal information must be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

In respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, it is the respective client's responsibility to ensure that it is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. Fastrac verifies the address accuracy of mailing lists supplied to postal administration standards. This verification does not involve matching the addressee with the address except in limited situations (such as "move-checks" on databases for mailing to the United States, Canada and other destinations).

7. Security Safeguards

Personal information must be protected by security safeguards appropriate to the sensitivity of the information.

8. Openness Concerning Policies and Practices

Fastrac is required to make readily available to individuals specific information about its policies and practices relating to the management of personal information.

9. Individual Access

Upon request, individuals shall be informed of the existence, use and disclosure of their personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and to have it amended as appropriate.

In respect to personal information entrusted to us by our clients, such as mailing lists and nature of mailing materials, for such requests the individual shall be referred to the client from which the mailing lists and materials originated.

10. Challenging Compliance (Provide Recourse)

An individual shall be able to address a challenge concerning compliance with the principles to the designated individual or individuals accountable for Fastrac's compliance.

Questions or enquires with respect to the privacy principles outlined or about our practices should to be directed to:

Privacy Officer
Fastrac Mail Services Ltd.
5-6782 Veyaness Road
Saanichton, BC, V8M 2C2
Tel: 250-652-9936

Personal Information Collected and Use

As our focus is business to business the personal information that we collect is limited to:

A) Fulfillment client's mailing lists and related materials

Information entrusted to us by our clients, such as mailing lists and nature of mailing materials, which may include:

- Personal names and addresses
- Business names and address
- Knowledge of personal memberships

Such information is collected and used only for the purpose as directed by our client. For further information in respect to Privacy matters of personal information entrusted to us by clients please refer to the notations under the 10 Principles.

B) Clients

Business and personal information that we collect from clients may include:

- Business name and Contact person name
- Business address and business contact information
- Name of owner(s), officer(s) and director(s)
- Financial information

The information is only collected, used and disclosed in order to:

- Establish identification
- Understand needs for service and provide ongoing service
- Fulfill credit requirements (if applicable)
- Comply with legal requirements

C) Website

When users visit our website, information is not collected that can identify individuals, unless one chooses to be identified. When such information is provided it is limited to the purpose(s) identified at time of collection.

D) Staff

Personal Information obtained from staff is limited to information required for Fastrac to meet its obligations to pay employees and other reporting and payment requirements under legislation as Workman's Compensation, Canada Pension Plan, Employment Insurance and Income Tax.

All information provided to us is securely maintained and kept strictly confidential.

Right to Refuse

Clients may refuse to provide personal information to Fastrac and they may withdraw their consent at any time, subject to legal or contractual restrictions and reasonable notice. However, such action may limit Fastrac's ability to serve the respective client and/or meet its contractual obligations to the client.

Information disclosed to Third Parties

Fastrac keeps personal and business information confidential except under the following circumstances, as:

- Authorized by the respective client
- Required by law
- Permitted by law

Information shared with or accessible by

Fastrac, its management and employees are governed by and informed of the Company's Privacy policies, to ensure that personal and business information is collected, used, disclosed and secured appropriately. Client information and information provided in-trust to us by clients (e.g. mailing lists) is strictly confidential.

Employees and contract staff

In the course of business operations access to personal and business information is limited to staff who have a legitimate business purpose to do so ("need to know basis"). Further, staff and contract staff sign confidentiality agreements.

Subcontracting (outside service providers)

On limited basis we contract external organizations to perform specialized services such as "move-checks" on mailing lists to United States, Canada and other destinations.

For such specialized services Fastrac:

- limits the provision of information to what is required to perform such services
- bounds these parties to confidentiality and privacy agreements

Security

Fastrac maintains a secured environment to ensure that personal and business information is protected, based upon the sensitivity of the information. Mailing lists are archived for a period of 3 months unless expressly requested by the client to destruct immediately upon processing.

Web

No online business transactions are performed. We encourage all our clients to send us their mailing lists and related materials by secured means such as encryption.

Access and Correction

Clients have the right to access, verify and amend personal information that Fastrac maintains. Should adjustments be required Fastrac will make the appropriate adjustments and provide a copy of the corrected information to the client making the request within 30 days, in most cases, on receipt of the request.

For access and or changes the Privacy Officer should be contacted:

Privacy Officer
Fastrac Mail Services Ltd.
5-6782 Veyaness Road
Saanichton, BC, V8M 2C2

Tel: 250-652-9936

Depending upon the information requested there may be a minimal fee. Parties will be informed of the amount, if any, before the request is fulfilled.

Under circumstance specified in legislation request for access may be denied. If such occurs Fastrac will inform the party with 30 days of receipt of request and the potential recourse avenues available.

Complaint Handling Process

Fastrac is committed to fulfilling its obligations under the Personal Information Protection Act (BC), however if a misunderstanding occurs or a party is concerned that they may have been treated unjustly the process for resolving privacy concerns and disputes is:

1. Contact Fastrac's Privacy Officer:
The first step is to contact Fastrac's privacy officer:
Privacy Officer
Fastrac Mail Services Ltd.

5-6782 Veyaness Road
Saanichton, BC, V8M 2C2

Tel: 250-652-9936

Concerns and/or complaints should be clearly stated in writing.

2. Response from Fastrac's Privacy Officer

Fastrac's Privacy Officer will respond in writing to the complaint within 30 days.

3. Recourse

If a complainant is not satisfied with the response of Fastrac's Privacy Officer they have recourse via:

Office of the Information and Privacy Commissioner for British
Columbia
PO Box 9038, Strn. Prov. Govt.
Victoria, BC, V8W 9A4

Tel: 250-387-5629

Vancouver: 604-660-2421

Toll free: 1-800-663-1376

Fax: 250-387-1696

E-mail: Info@oipc.bc.ca

Web Site: www.oipc.bc.ca

Updating Privacy Policy

Should Fastrac's Policy Privacy be revised the revised Privacy Policy will be placed on our website within 30 days. Copies may also be obtained from Fastrac's office.

Further Resources

To assist you to understand Privacy and your rights under the BC Legislation we encourage you to review the Privacy Commissioner for British Columbia website:

www.mser.gov.bc.ca/FOI/POP

The PIPA (Personal Information Protection) Act hotline is:

Victoria: 250-356-1851

Vancouver: 604-660-2421

Toll free: 1-800-663-1376