

PORTER HETU INTERNATIONAL PRIVACY POLICY

WHEREAS PORTER HETU INTERNATIONAL INC. ("PHI") recognizes the importance of privacy and the sensitivity of personal information.

AND WHEREAS PHI's members are committed to protecting your personal information. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

AND WHEREAS effective January 1, 2004, all businesses engaged in commercial activities must comply with the Canadian government's Personal Information Protection and Electronic Documents Act ("PIPEDA") and the Canadian Standards Association Model Code for the Protection of Personal Information that PIPEDA incorporates. This obligation extends to all Canadian businesses including PHI. PIPEDA gives you rights concerning the privacy of your personal information.

AND WHEREAS "*Personal information*" includes information about an individual, but does not include the name, title, business address, phone number or email address of an employee of an organization.

AND WHEREAS PHI's privacy policy incorporates the 10 internationally recognized principles on which PIPEDA is based.

Principle # 1: Accountability

PHI is responsible for the personal information under our control and has designated a Privacy Officer who is accountable for compliance with our Privacy Policy. We also require that comparable protection of personal information is in place with any third parties used by us to process such information.

Principle # 2: Identifying Purposes

The purposes for which we collect personal information will be identified at or before the time the information is collected. These purposes presently include:

- a) Day to day operations,;
- b) Communication with members

Any new purposes will be identified prior to use for those purposes. Your

consent will be obtained for the new uses, except where such uses are required by law.

Principle # 3: Consent

Your knowledge and consent are required for the collection, use or disclosure of personal information, except where inappropriate.

We will specify the reasons for collection, use or disclosure. Your consent may be obtained, depending on the particular information and circumstances, orally or in writing, implied or expressed. Where information is sensitive we will obtain express consent.

Principle # 4: Limiting Collection

The collection of personal information will be limited to the amount and type necessary for our purposes. The information will be collected by fair and lawful means. Wherever possible we will collect your personal information directly from you in the ordinary course of conducting our business.

Principle # 5: Limiting Use, Disclosure and Retention

Your personal information shall not be used or disclosed for purposes other than those for which it was collected, except with your consent or as required by law.

We use your personal information to provide and market our services to you and to administer your account with us. If you advise us that you no longer wish to receive information about our services we will not send any further material.

PHI does not disclose your personal information to any third party to enable them to market their products or services. For example, we do not provide our client mailing lists to suppliers or other clients.

Whenever we disclose your personal information to third parties for the purpose of providing services to us, we require such parties to maintain levels of confidentiality and security that are equivalent to our own practices.

Your personal information shall be retained only for as long as is necessary to complete the purposes for which it was collected, or as long as required by law. Personal information that is no longer required is discarded or destroyed using methods that protect your privacy (e.g. by paper shredding and/or deletion of electronic files).

Principle # 6: Accuracy

The personal information managed by PHI shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is being used.

If any of your personal information changes, we require details of those changes for our own uses and for the uses of third parties to whom such information is disclosed.

Principle # 7: Safeguards

PHI takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure.

Among the steps taken to protect your information are:

- a) Premises security;
- b) Restricted file access to personal information;
- c) Deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access;
- d) Internal password and security policies.

Principle # 8: Openness

PHI will make available specific information about its policies and practices relating to the management of personal information.

Updated versions of PHI's Privacy Policy are posted on our website at www.porterhetu.com. Any queries about this can be directed to PHI's Privacy Officer as indicated below:

Privacy Officer
Attention: Maria Vincelli
PORTER HETU INTERNATIONAL
5800, Monkland Avenue, 2nd Floor
Montréal (Québec)
H4A 1G1
Phone: (514)369-7529

Principle # 9: Individual Access

Upon request, PHI will provide you with details of the existence, use and disclosure of your personal information and will provide you with reasonable access to that information.

You will be able to amend any of the information for accuracy and completeness. For access to your personal information contact the Privacy Officer by the means indicated in section 8 above.

Principle # 10: Challenging Compliance

You will be able to address your concerns regarding PHI's compliance with the above principles to our Privacy Officer. We will take the steps necessary to resolve the issue, including amending our Privacy Policy and practices, if necessary.

If we are not able to resolve your concern, or if you have any other concerns about PHI's Privacy Policy and procedures, you may contact the Officer of The Privacy Commissioner of Canada, or, if applicable, the provincial Privacy Commissioner. PHI's Privacy Officer will provide you with this contact information upon request.