



PRIVACY POLICY

High Clouds Incorporated provides a broad range of services to our clients. We have a longstanding policy of protecting the privacy of our clients in the course of providing services to them. Our relationship with our clients is based upon trust and maintaining client privacy is, therefore, given the utmost priority.

The High Clouds Incorporated Privacy Policy is a formal statement of principles and guidelines that we have adopted for the protection of personal information, ("PI") we may collect from, for or on behalf of our clients. Our objective in developing this Privacy Policy is to promote responsible practices in the management of PI in accordance with the provision of the PI Protection and Electronic Documents Act, ("PIPEDA") and other similar legislation. This policy is organized according to the principles of the Canadian Standard's Associations Model Code, which forms the basis of that law.

1. Privacy Policy.

High Clouds Incorporated recognizes the importance of privacy and the sensitivity of PI. We understand that we have an obligation to keep confidential all PI we receive from our clients. We are committed to protecting any PI we hold. This Privacy Policy outlines how we manage your PI and safeguard your privacy.

2. Your Privacy Rights.

From January 1, 2014, all organizations engaged in commercial activities must comply with the PI Protection and Electronic Documents Act and the Canadian Standards Association Model Code for the Protection of PI which it incorporates. These obligations extend to High Clouds Incorporated. The Act gives you rights concerning the privacy of your PI.

High Clouds Incorporated is responsible for the PI we collect and hold. To ensure this accountability, we have developed this policy, and trained our staff about our policies and practices.

3. Why Does High Clouds Incorporated Need PI?

High Clouds Incorporated provides dispute resolution and educational services and products to a wide range of clients. We require some PI to provide these services to you; create and maintain clients lists; and produce direct marketing materials concerning our services and developments in the various communities in which we operate.

4. What PI do we collect?

PI is any information that identifies you, or by which your identity could be deduced. If we did not collect and use your PI we could not provide you with our services. PI that we collect includes, but is not necessarily limited to, the following:

- Your name, home address and home telephone and/or cell phone numbers;
- Your e-mail address;
- Your business name and contact information;
- Credit card information;



- Professional advisors – ie. Lawyer, accountant, manager;
- Banking information, (eg. from your client cheques.)

5. How do we collect your PI?

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect you PI directly from you at the start of your client relationship and through ongoing contact. Additional information may be obtained through course quotations or registrations, dispute resolution services or through questionnaires on issues relating to our business.

Sometimes we may obtain information about you from other sources, for example:

- Your professional advisors;
- From a government agency or registry;
- From you company or employer.

6. Consent.

In most cases, we shall ask you to specifically for consent, if we collect, use, or disclose your PI. Normally, we ask for your consent in writing but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us, for example when you provide us with PI when contracting us for work or in the course of work we do for you.

7. Use of Your Information.

We use your PI to provide our services to you and to include you in any direct mailings or information relating to our services that we believe would be of some interest to you. We also will use it for marketing activities such as notification of upcoming meeting, courses, seminars, conferences and products. If you tell us that you no longer wish to receive information about our services, seminars or about new developments, we will not send any further material

High Clouds Incorporated does not disclose your PI to any third party, to enable them to market their products and services. For example, we do not provide our client mailing lists to other organizations or businesses.

8. Disclosure of your PI.

Under certain circumstances, High Clouds Incorporated will disclose your PI:

- When we are required or authorized by law to do so, for example, if a court issues a subpoena;
- When you have consented to the disclosure;
- Where it is necessary to establish or collect fees;
- If we engage a third party to provide administrative services to us (such as an accounting service, mailing service or archival file storage) and the third party will be bound by our Privacy Policy;
- If we retain agents or consultants to assist us in completing research relation to our products and services.



- If the information is already publicly known.

In these instances we will only disclose such PI as is required in the circumstances.

9. Updating Your Information

Since we use your PI to provide our services to you, it is important that the information be accurate and up-to-date.

If during the course of your relationship any of your PI changes, please inform us so that we can make any necessary changes.

10. Is My PI Secure?

High Clouds Incorporated takes all reasonable precautions to ensure that your PI is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- Premises security;
- Employee training in the storage, safe guarding and use of PI;
- Restricted file access to PI;
- Deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access; and
- Internal password and security policies.

If we use the services of any third parties to process or store PI, we will enter into an agreement which requires them to protect this PI in a manner acceptable to us. In entering into these agreements we do not transfer any interest in this PI to them. This is done to ensure that the PI delivered to third parties is maintained at a level equivalent to that provided for the under this Privacy Policy.

11. Access to Your PI.

You may ask for access to any PI we hold about you.

Summary information is available on request. More detailed requests which archive or other retrieval costs may be subject to a reasonable fee.

We also reserve the right to confirm the identity of the person seeking access to PI before complying with any access requests. Please submit your access request in writing or e-mail to our privacy officer as identified in paragraph 18.

12. Correcting Errors.

If High Clouds Incorporated holds information about you and you can establish that it is not accurate, complete and up-to-date, we will take reasonable steps to correct it.

13. Can I be denied Access to My PI?

In most cases, a client of High Clouds Incorporated will have access to the PI we store about you. However, there may be rare occasions when your rights to access your PI are denied, for example the PIPEDA indicates that:



- Your rights to access your PI are not absolute;
- Denial of access is required or authorized by law.
- When granting you access would have an unreasonable impact on other people's privacy;
- When to do so would prejudice negotiation with you;
- To protect High clouds Incorporated's rights and property; or
- Where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we will endeavor to explain why.

14. Can I request anonymity?

Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name (for example, by accessing general information on our website).

15. Credit Bureaus

On occasion we may request information about you from the files of consumer agencies or file complaints with those agencies, such as where a member has failed to pay a debt owed to us.

16. Communicating with Us By E-Mail and/or Fax

You should be aware that e-mail and fax are not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information or requesting us to respond to you by e-mail.

17. Changes to this Privacy Policy

Since High clouds Incorporated regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time. These changes will be posted to our web-site as soon as is practical.

18. Requests for Information Access and/or Corrections

If you have any questions, or wish to access you're PI, please write to our Privacy Contact,

Ms Deborah Howes
34th Street Business Centre
3438 – 78 Avenue
Edmonton AB T6H 2X9
Phone: 780-466-8250
E-mail: dhowes@highclouds.ca

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec K1A 1H3

We may seek external advice, where appropriate, before providing a final response to individual complaints.



19. Employment Inquiries.

If you apply to High Clouds Incorporated for a job, we need to consider your PI, as part of our review process. We normally retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

20. Web Sites

Our website contains links to other sites, which are not governed by this Privacy Policy.

On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable PI.

Thank you for taking the time to review our Privacy Policy