

DATALATCH WEBSITE PRIVACY POLICY

DataLatch ("**DataLatch**"), a division of Mutsuddi Consulting Inc., is committed to maintaining the privacy of the personal information of our customers, members and those individuals who interact with this website (the "**Website**") and its related services (the "**Services**"). This Privacy Policy describes how DataLatch collects, uses and discloses the personal information that it collects from or about you through the Website or the Services.

Consent

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

By using our Website and the Services, you signify your consent to the collection, use and disclosure of your personal information as explained in this Privacy Policy. If you do not agree with the contents of this Privacy Policy, you should not use our Website or the Services. You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer in writing using the contact information set out below. Please note that if you withdraw your consent to certain uses of your Personal Information then we may no longer be able to provide you with certain of our products or services. We assume that, unless you advise us otherwise, that you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

Privacy Policy Effective for Canada

It is DataLatch's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities of DataLatch that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact our Privacy Officer for more information.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

What Personal Information Do We Collect?

Our web server may collect information related to your visit to our Website and your use of the Services, including your IP address and device event information such as crashes, system activity, hardware settings, the date and time of your request and the referral URL. This information may be used to monitor the performance of the Website and the Services and for business purposes such as improving our Website and the Services in order to provide you with a better user experience.

We collect and maintain different types of personal information in respect of the individuals with whom we interact, including information that you submit to our Website. This includes:

- contact and identification information, such as your name, address, telephone number and e-mail address;
- credit card and payment information;
- product and service related information concerning the products and services that we provide to you; and
- business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to you.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. This information may include contract terms, financial information and other information for the purpose of market analysis and strategic planning. We may also collect information related to our media, investor and public relations activities and information related to our interactions with financial and other analysts and advisors.

As a general rule, DataLatch collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Please note that in some cases we may collect your personal information without your knowledge or consent where we are required or permitted by applicable law or regulatory requirements to do so.

Why Do We Collect Your Personal Information?

We collect personal information to enable us to manage, maintain, and develop our business and operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

How Do We Use and Disclose Your Personal Information?

We may use and disclose your personal information:

- for the purposes described in this Privacy Policy; or
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When do We Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, including: third parties that provide services to us or on our behalf; third parties that assist DataLatch in the provision of services to you; and third parties whose services we use to conduct our business.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- to protect the rights and property of DataLatch;

- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent.

How Do We Use Cookies?

When you visit the Website, we may place a "cookie" on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our Website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the Website so that we can better understand your use of our Website so that we can customize and tailor the Website to better meet your needs. Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (i) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (ii) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access a number of web pages found on the Website.

Links to Third Party Websites

Our Website may contain links to other websites that may be subject to less stringent privacy standards. DataLatch cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. DataLatch is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

Protecting Personal Information

DataLatch endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. **DATALATCH DOES NOT ACCEPT ANY LIABILITY FOR PERSONAL INFORMATION SUBMITTED TO US VIA THE INTERNET, NOR FOR YOUR OR ANY THIRD PARTIES' USE OR MISUSE OF PERSONAL INFORMATION.**

The security of your personal information is important to us. Please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Updating Your Personal Information

It is important that the personal information DataLatch holds about you is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes. In some circumstances we may not agree with your

request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer using the contact information set out below. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer using the contact information set out below.

Please also note that there are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer using the contact information set out below. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

Privacy Officer
c/o DataLatch, a division of Mutsuddi Consulting Inc.
Manulife Place, Suite#3400,
10180 -101ST NW, Edmonton, Alberta, Canada T5J 3S4
Email: legal@datalatch.ca

Revisions to this Privacy Policy

DataLatch may, from time to time, make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our Website, and we encourage you to refer back to it on a regular basis. Any changes will be noted by a change in the date of the policy. This Privacy Policy was last updated on April 15, 2015.

Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon DataLatch any obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.