

THE POMPONIO & CO. PRIVACY PROTECTION PLEDGE

At POMPONIO & CO., we respect your privacy. That is why we have developed The POMPONIO & CO. Privacy Code of which the objective is to specify POMPONIO & CO.'s guidelines for the collection, use and disclosure of your personal information.

The POMPONIO & CO. Privacy Code was developed to comply with the relevant portions of the *Personal Information Protection Act* (British Columbia), and the *Personal Information Protection and Electronic Documents Act* (Canada). We have drafted The POMPONIO & CO. Privacy Code to facilitate our compliance with this new legislation and to demonstrate our commitment to protecting your personal information.

We have also developed The POMPONIO & CO. Privacy Protection Pledge. We want you to understand the purposes for which we collect personal information. We also want to make certain that we have your consent to continue to collect, use and disclose your personal information for those purposes.

The following is a brief synopsis of our privacy practices:

Why do we need to collect your personal information?

If you are a POMPONIO & CO. client, POMPONIO & CO. may have collected some basic information about you. We respect your privacy, which is why we collect personal information only for the following purposes:

POMPONIO & CO. will collect, use or disclose personal information only to provide professional services to you. Each engagement letter includes an explanation of why we require information, what use will be made of it and with whom it may be shared in order to provide our professional services.

Your personal information may be disclosed internally and with other contracted professionals for the purpose of determining compliance with applicable professional standards, POMPONIO & CO. internal policies, or in the performance of quality reviews. Personal Information may also be shared internally in order to allow us to offer services or products that may be of interest to you.

When do we disclose personal information?

There is a variety of circumstances where we may need to disclose some personal information about our clients. Here are some examples:

POMPONIO & CO. will obtain a client's consent prior to using their personal information for a purpose not previously identified to them.

However, we may use personal information without consent where for the purpose of acting in respect of an emergency that threatens the life, health or security of an individual. We may also disclose personal information without consent:

- to comply with a subpoena, a warrant or an order made by a court or other body with appropriate

- jurisdiction or to comply with rules of conduct required by regulatory bodies.
- to a government institution that has requested the information, identified its lawful authority, and indicates that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial or foreign law; or suspects that the information relates to national security or the conduct of international affairs; or is for the purpose of administering any federal or provincial law.
 - to an investigative body or government institution on our initiative when we believe the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or we suspect the information relates to national security or the conduct of international affairs.

How do we protect your personal information?

In order to protect your personal information, POMPONIO & CO.:

1. will not collect, use or disclose your personal information for any purpose other than those identified above, except with your further consent;
2. will protect your personal information with appropriate security safeguards;
3. will protect the confidentiality of your personal information when dealing with other organizations;
4. will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above; and
5. will honour any request you may make for access to your personal information.

What are your choices?

We would like to have your consent to continue to collect, use and disclose your personal information for the purposes identified above. However, you do have choices and can refuse or withdraw your consent as follows:

1. You may refuse to provide your personal information to us.
2. You may also withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

However, in either case, this may limit our ability to serve you.

If you have any questions or concerns about our personal information management system, please contact the POMPONIO & CO. Privacy Officer at 1-250-478-3230 or via info@pomponio.ca. Otherwise, we will assume that we have your consent to collect, use and disclose your personal information for the purposes identified above and in a manner consistent with The POMPONIO & CO. Privacy Code.

Please visit the Office of the Privacy Commissioner of Canada's web site at <https://www.priv.gc.ca/en/>.

