

EVENTIVE MARKETING INC. PRIVACY POLICY

Our Commitment to Protecting Your Privacy

At Eventive Marketing Inc., respecting privacy is an important part of our commitment to our clients, our employees and the general public.

When you participate in events conducted by our organization, you can be confident that any personal information that you share with us will stay with us.

Any time you register as a participant for an event, whether in person or by telephone, mail or Internet, you can be assured:

- That your individual responses will be kept confidential.
- That your personal identifying information will never be sold to anyone.

Eventive Marketing Inc. maintains strict privacy standards as specified in our Privacy Policy, which are also consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada).

Eventive Marketing Inc. reviews its Privacy Policy regularly to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

If you have any concerns about how your privacy is protected at Eventive Marketing Inc., please contact our Privacy Officer by e-mail at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9.

Eventive Marketing Inc. Privacy Policy Scope and Application

The principles that form the basis of Eventive Marketing Inc.'s Privacy Policy are interrelated and Eventive Marketing Inc. shall adhere to the principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the Personal Information Protection and Electronic Documents Act (Canada), the commentary in Eventive Marketing Inc.'s Privacy Policy has been drafted to reflect personal information issues specific to Eventive Marketing Inc.

The scope and application of Eventive Marketing Inc.'s Privacy Policy are as follows:

- The Privacy Policy applies to personal information collected, used, or disclosed by Eventive Marketing Inc. in the course of commercial activities.
- The Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.

- The Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by Eventive Marketing Inc.:
 - Non-personally identifiable information;
 - The name, title, business address, telephone number, email address of an client and any other information relating to the registration of an event;
 - Other information about an individual that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act (Canada).

- The application of the Privacy Policy is subject to the requirements and provisions of the Personal Information Protection and Electronic Documents Act (Canada), the regulations enacted there under, and any other applicable legislation or regulation.

Definitions

Collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

Consent: Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Eventive Marketing Inc. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

Disclosure: Making personal information available to a third party.

Employee: An employee of or independent contractor to Eventive Marketing Inc.

Personal and Contact information: Information about an identifiable individual such as name, age, home address, title, business address or telephone number of a client, and does not include descriptive, factual information about an organization.

Client: A member of the public who provides personal information to Eventive Marketing Inc. in the course of a registration/program conducted by Eventive Marketing Inc. For example, a client is an individual who discloses personal information to Eventive Marketing Inc. in the course of an event being run by Eventive Marketing Inc. that may or may not include registration.

Third party: An individual or organization contracted by Eventive Marketing Inc.

Use: The treatment, handling, and management of personal information by and within Eventive Marketing Inc. or by a third party with the knowledge and approval of Eventive Marketing Inc.

Accountability

Eventive Marketing Inc. is responsible for personal information under its control and shall designate one or more persons who are accountable for Eventive Marketing Inc.'s compliance with the following principles.

Responsibility for compliance with the provisions of Eventive Marketing Inc. Privacy Policy rests with Eventive Marketing Inc. Privacy Officer who can be reached by email at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9. Other individuals within Eventive Marketing Inc. may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

Eventive Marketing Inc. is responsible for personal information in its possession or control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party. For purposes of managing a client's event, Eventive Marketing Inc. uses the services of on-line registration companies. Eventive Marketing Inc. does its due diligence when selecting these companies to ensure they meet approved information security policies. For further information on these third-party companies, please contact our Privacy Officer by e-mail at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9.

Identifying Purposes for Collecting Personal Information

Eventive Marketing Inc. shall identify the purposes for which personal information is collected at or before the time the information is collected.

Eventive Marketing Inc. collects personal information from the client only for the purposes of executing the event as requested by the client.

Upon request, persons collecting personal information shall explain this identified purpose or refer the individual to a designated person within Eventive Marketing Inc. who can explain the purpose.

When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the client will be acquired before the information will be used or disclosed for the new purpose.

Eventive Marketing Inc. may provide clients or other third parties with information from any event, in aggregate form.

Obtaining Consent for Collecting, Use or Disclosure of Personal Information

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

Participation by clients is always voluntary. When a client agrees to participate in an event, he/she gives consent by participating in the registration of aforementioned program.

In obtaining consent, Eventive Marketing Inc. shall use reasonable efforts to ensure that a client is advised of the identified purposes for which personal information will be used or disclosed. The identified purpose shall be stated in a manner that can be reasonably understood by the client.

Generally, Eventive Marketing Inc. shall seek consent to use and disclose personal information at the same time it collects the information. However, Eventive Marketing Inc. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, Eventive Marketing Inc. shall take into account the sensitivity of the personal information and the reasonable expectations of its clients.

Limiting Collecting, Use, Disclosure and Retaining of Personal Information

Eventive Marketing Inc. shall limit the collection of personal information to that which is necessary for the purpose identified by Eventive Marketing Inc. Eventive Marketing Inc. shall collect personal information by fair and lawful means.

We collect only the amount and type of information needed for the purpose identified to individuals.

Eventive Marketing Inc. will only collect personal information from external sources, such as client organizations, if individuals have consented to such collection.

Eventive Marketing Inc. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Eventive Marketing Inc. may disclose a client's personal information to a public authority or agent of a public authority if, in the reasonable judgment of Eventive Marketing Inc., it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; or to a third party or parties, where the client consents to such disclosure or disclosure is required or permitted by law.

Only Eventive Marketing Inc.'s employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about clients. Eventive Marketing Inc. shall keep personal information only as long as it remains necessary or relevant for the identified purpose or as required by law.

Depending on the circumstances, where a client may have to be re-contacted for purposes of clarifying responses to a registration, or to seek additional responses, Eventive Marketing Inc. shall retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

Eventive Marketing Inc. shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous. For information on our Information Security Policy, please contact our Privacy Officer by e-mail at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9.

Ensuring Accuracy of Personal Information

We will make reasonable efforts to ensure the client's personal information is accurate and complete where it may be used to make a decision about the client to another Third Party.

A client may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing to the Privacy Officer by email at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9.

If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any Third Party as is necessary for the intended purpose.

Securing Personal Information

Eventive Marketing Inc. shall protect personal information through security safeguards appropriate to the sensitivity of the information.

Eventive Marketing Inc. shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

Eventive Marketing Inc. shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purpose for which it is to be used.

All of Eventive Marketing Inc.'s employees with access to personal information shall be required to respect the confidentiality of that information.

Openness Concerning Policies and Procedures

Eventive Marketing Inc. shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

Eventive Marketing Inc. shall make information about its policies and procedures easy to understand, including:

- a) the title and address of the person or persons accountable for Eventive Marketing Inc.'s compliance with its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- b) the means of gaining access to personal information held by Eventive Marketing Inc.;
- c) a description of the type of personal information held by Eventive Marketing Inc., including a general account of its use; and
- d) a description of what personal information is made available to related organizations (e.g. Third Parties).

Providing Access to Personal Information

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer by email at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9.

Upon request, to the Privacy Officer, Eventive Marketing Inc. will confirm the existence and advise on the use of the client's personal information and to whom it has been disclosed if applicable.

We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

In certain situations, Eventive Marketing Inc. may not be able to provide access to all the personal information that it holds about a client. For example, Eventive Marketing Inc. may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Eventive Marketing Inc. may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a client may be required to provide sufficient identification information to permit Eventive Marketing Inc. to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

Eventive Marketing Inc. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Eventive Marketing Inc. shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Eventive Marketing Inc.'s compliance with Eventive Marketing Inc. Privacy Policy.

Eventive Marketing Inc. shall maintain procedures for addressing and responding to all inquiries or complaints from its clients regarding Eventive Marketing Inc.'s handling of personal information.

Eventive Marketing Inc. shall, on written request, inform its clients about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with Eventive Marketing Inc. Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

Eventive Marketing Inc. shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, Eventive Marketing Inc. shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The client shall be informed of the outcome of the investigation regarding his or her complaint.

Questions and Complaints: The Role of the Privacy Officer or designated individual

The Privacy Officer or designated individual is responsible for ensuring Eventive Marketing Inc. is in compliance with this policy and the Personal Information Protection Act.

Any complaints, concerns or questions regarding Eventive Marketing Inc.'s compliance should be made in writing to the Privacy Officer by e-mail at privacy@eventivemarketing.ca, or by mail at: 80 Travail Rd., Unit 1, Markham, ON L3S 3H9.

Please visit the Privacy Commissioner of Canada's website at www.privcom.gc.ca.