



PRIVACY POLICY

Canadian Privacy Policy Nor-Don Collection Network Inc.

Introduction

Nor-Don Collection Network Inc., ('NCN') has prepared this policy to inform you of its practices regarding the collection, use and disclosure of the personal information about identifiable individuals. We take measures to safeguard the privacy and confidentiality of personal and confidential information. Adhering to strict confidentiality and privacy guidelines as outlined in the Personal Information Protection and Documents Act (Canada) and the various Provincial Privacy Acts, is the cornerstone of our commitment to protecting the privacy of our employees, clients and their customers.

Scope

This policy applies to the operations of NCN and its subsidiaries across Canada and across all business units.[1]

Personal information means any information, recorded in any form, about an identifiable individual. Personal information does not include anonymous or aggregated information. Anonymous or aggregated information is information that cannot be associated with or traced back to an identifiable individual.

Consent

Except where permitted or required by law, NCN will endeavour to obtain the consent of each individual and/or company providing personal information to NCN for the collection, use or disclosure of such personal information by NCN.

Corporate Responsibility

NCN is a Canadian owned and operated collection agency specializing in providing its customers with various debt collection services. NCN's customers include major financial institutions, retailers, governments and their agencies, telecommunication firms, utilities and other firms that are in the practice of granting credit to its customers.

NCN therefore owes a duty of care to its customers and by extension to our customers' customers. The information to which NCN is granted access to by its customers is of a highly confidential nature as is the information that is acquired during the execution of its business activities. For these reasons, NCN has developed and applied specific privacy and confidentiality policies in order to manage and safeguard this information.

Our Employees Responsibilities

Each one of our employees is responsible for maintaining the confidentiality of all personal information to which he/she is granted access to. NCN employees are trained upon hiring about their duties in this regard and are required to sign a confidentiality agreement binding them to these responsibilities. In addition, all employees are required to review and acknowledge an understanding of the Personal Information Protection and Documents Act, applicable Provincial Privacy Legislation as well as other regulatory guidelines.

NCN continually coaches and trains our employees with respect to ongoing compliance as well as understanding developing issues in the realm of privacy and confidentiality. NCN employees are also required, as a condition of employment, to conform to these policies and procedures.

Privacy Principles Regarding the Collection, Use and Disclosure Activities of NCN

- NCN gains access, through its customers, to sensitive information which information is required for NCN to provide debt collection services to its customers.
- NCN limits the amount and type of personal information it collects. NCN will only collect information required for its business operations;
- NCN will only use information for the reasons it was collected and will not willfully disclose this information to third parties unless duly authorized to do so or as required by law;
- NCN will store all information in its care in a secured fashion, whether electronic or paper based. NCN will restrict access to those employees who specifically and lawfully require the information for the purposes of performing their duties;
- NCN will maintain personal information for as long as NCN believes it is necessary to fulfill the purpose for which it was collected and as required by applicable laws. NCN will proceed to securely dispose of any information that is no longer of value to NCN in its completion of its business activities;
- NCN will take all reasonable steps so that customer information is accurately maintained, complete and up to date as is necessary to fulfill the purposes for which this information is to be used;
- NCN will take reasonable measures so that customer information is protected by the appropriate security safeguards as required by the sensitivity level of the information maintained;
- NCN customers may, upon written request, have access to their personal information maintained by NCN. The written request must contain sufficient detail to enable NCN, with reasonable effort, to identify the information in respect of which the written request is made. ;
- Customers may challenge NCN's compliance with the privacy policy. It is at the written request of the customer that we will undertake to investigate and respond in writing to any customer complaint.
- NCN will not sell any customer information;
- NCN will be receptive and open to customer concerns regarding our policies and procedures that apply to the management of the customer information

Privacy Contact

Nor-Don Collection Network Inc. has appointed a Chief Privacy Officer who oversees privacy governance including policy, dispute resolution, education, communications and escalation. NCN's Privacy Officer reports to the Chief Executive Officer and Board of Directors. The Chief Privacy Officer can be contacted at Nor-Don Collection Network Inc., 325 Milner Avenue, Suite #1111, Toronto, Ontario, M1B 5N1, directly by phone at 647-436-2610, fax 416-412-6165 or email jburke@ncn.ca.

If you have concerns or questions regarding NCN's privacy policy, or wish to access or correct your personal information, please contact the privacy officer as set out above.

In Summary

NCN considers privacy and the protection of confidential information to be a cornerstone of its business practices. NCN will continue to develop review and monitor its policies and procedures to ensure compliance with all applicable legislation, customer requirements and general common sense and commits to treating the individuals, whose information has been entrusted to NCN with care and dignity.

I have hereby read and acknowledge my duties under NCN's Privacy Policy as detailed above.

Employee's Signature

Date

[1] Any reference to NCN is to include all business units and subsidiary operations. Any reference to customers means NCN's customers and/or that of our customers' customers.