

Policy on Privacy of Customer Personal Information

Pharma Security Group Inc. ('PSG') is committed to protecting the privacy and security of your personal information obtained by reason of your customer relationship with PSG. The PSG Privacy Policy ("**Privacy Policy**") explains the types of customer personal information we collect, how it is used, and the steps we take to ensure your personal information is handled appropriately.

Who is PSG?

For purposes of this Privacy Policy, "PSG" means Pharma Security Group Inc. PSG also includes any successors or subsidiaries connected to its corporation.

What is personal information?

Personal information is information about an identifiable individual. Personal information includes such things as your name, address, age, income, date of birth, gender, financial information and credit records, as well as your opinions, preferences and purchase patterns.

Privacy Principles:

1 - We are accountable to you

PSG is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. To achieve this objective, PSG has developed and implemented this Privacy Policy.

2 - Why we collect your personal information

PSG identifies the purpose for which your personal information is collected. We do this before or at the time the information is actually being collected. We collect, use and disclose your personal information in order to:

- process your application for a product or provide a service;
- better understand your product and services needs and to offer relevant information, products and services to meet those needs;
- determine your interest and eligibility for, and where appropriate provide you with, products and services;
- administer the delivery of products and services to you;
- track and analyze your purchases, other transactions, shopping patterns, account activity, and payment history for marketing analysis purposes or making promotional offers to you;
- conduct surveys and analysis for research, statistical and product development purposes (information will be anonymously collected to the extent possible);
- verify your identity and protect against error and fraud;
- assess and update your credit-worthiness on an ongoing basis;
- process, service, analyze and audit your relationship with us, including collecting any money you owe us;
- support promotions and contest administration;
- perform tests to implement or modify systems;
- comply with legal and regulatory requirements; and
- achieve other purposes as may, from time to time, be permitted by law.

By providing your information to PSG, you consent to PSG using your personal information for the purposes outlined above.

3 - We obtain your consent to collect, use or disclose your personal information

PSG obtains your consent to collect, use or disclose your personal information, except as permitted by law. The method of obtaining consent depends on the circumstances and the sensitivity of the information. Consent may be oral or written, express or implied. Your express consent (verbal, written or electronic agreement) is obtained to collect, use or disclose sensitive personal information. Implied consent is obtained in circumstances where a customer relationship already exists, express consent has previously been given, or the purpose of using the personal information is reasonably apparent to you. You can change your consent preferences at any time by contacting PSG's Customer Service Department (refer to the **contact information** at the bottom of this document).

Benefits you receive through consent

We want to give you exceptional customer service and additional value which is facilitated by sharing your information within PSG and across our various businesses. This sharing enables us to notify current and new customers of products, services, rewards and special offers they might enjoy. These notices may be given to you by postal mail, e-mail, facsimile, telephone, text message, automatic dialing-announcing device or other form of telecommunication using the contact information that you provide to us.

"Opting-out" or withdrawing your consent

If you decide that you do not want to receive marketing offers for products and services, you may always withdraw or refuse your consent at any time by emailing us at info@pharmasecurity.com. Your request will be promptly processed but may not be in time to remove you from promotions already in progress. Please note that even if you have opted out of receiving marketing communications, we may still contact you for purposes of administering your account.

The consequences of withdrawing or refusing consent

If you decide to withdraw or refuse your consent, our ability to communicate with you will be diminished. For example, we will generally not be able to tell you about price discounts, rewards, customized balance transfer offers, contests, or other products and services that may be of value to you.

4 - We limit collection of your personal information

PSG collects only the information required to provide products and services to you. If the personal information we require is collected for a reason other than as outlined in this Privacy Policy, your consent will be obtained before or at the time the information is collected. PSG will collect personal information only by clear, fair and lawful means.

5 - We limit use, disclosure and retention of your personal information

PSG uses and discloses your personal information only for the purposes for which it was collected, except with your consent or as required by law. We assure you that we do not sell or rent personal information. We only provide your personal information within PSG and across our various businesses, and with third party service providers for the administration of certain promotional activities, and to ensure your needs are met. We may transfer your personal information to entities outside PSG, such as our vendors, suppliers and agents who assist us in serving you ("**Service Provider**"). When your personal information is transferred to a Service Provider, we require them to protect the information in a manner that is consistent with this Privacy Policy. Our Service Providers may be located outside of Canada and may be required to disclose your personal information under the laws of their jurisdiction. You may contact us for information about our policies and practices regarding Service Providers to whom we have transferred your personal information and their locations (refer to the **contact information** at the bottom of this document). PSG retains your personal information only as long as it is required for our business relationship or as required by law. In the unlikely event that PSG, any of its affiliated companies, brands or substantially all of any of their assets are acquired by an unrelated third party, your personal information may be one of the transferred assets. By providing your personal information to us, you agree that we may disclose your personal information, on a confidential basis, to any prospective transferee and its professional advisors for the purposes of their due diligence investigations, the completion of any such transaction and the continued operation of the acquired business.

6 - We keep your personal information accurate

We want to keep your personal information up to date, accurate and relevant for its intended use. We rely on you to let us know if your address, telephone number or other information changes, so that we may provide you with the best possible service.

7 - How we protect your personal information

The security of your personal information is important to us. We will protect your personal information with appropriate safeguards and security measures. All of our Service Providers are required under their contracts with us to maintain your confidentiality and may not use your information for any unauthorized purpose. When we are required by law to provide information, we take reasonable steps to verify the lawful authority for the collection and we disclose only the information that is legally required. We review our procedures and security measures regularly to ensure that they are properly administered and remain effective and appropriate for the sensitivity of the information.

8 - We are open about our privacy and security policy

We are committed to providing you with understandable and easily available information about our policies and practices related to management of your personal information.

9 - You can access your personal information stored by us

You have the right to request access to your personal information we have on record in order to ensure it is accurate. If there are discrepancies, your information can be updated as appropriate. To access your personal information, a request must be submitted in writing to us (refer to the **contact information** at the bottom of this document). We will respond to your request for access or information in a reasonable time. There may be times when we are unable to fulfill your request - for example, if providing access to your personal information would reveal confidential commercial or proprietary information or personal information about someone else (and we are unable to separate your data), or if we are prohibited by law from disclosing the information.

10 - We respond to your questions, concerns and complaints about privacy

PSG responds in a reasonable time to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures. We will investigate and respond to any concern you have regarding the handling of your personal information. In most cases, an issue can be resolved simply by telling us about it and discussing any issues.

Contact Information

- By calling our Customer Service Department at 1-866-345-2465
- By e-mail at info@pharmasecurity.com
- By mail at 1-8000 Bathurst Street, PO Box 30116, Vaughan, ON, L4J 0B8 Canada -
Re: Privacy Inquiries