

**Altitude Holding Group Inc.  
CUSTOMER PRIVACY STATEMENT**

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**OUR COMMITMENT TO PRIVACY**

Altitude Holding Group Inc. ("Altitude") is committed to controlling the collection, use and disclosure of the personal information provided by its customers.

The Altitude Privacy Policy is modeled after the *Canadian Standards Association Model Code for the Protection of Personal Information* and is compliant with federal and provincial privacy laws including the federal *Personal Information Protection and Electronic Documents Act*. A summary of the ten principles of fair information practices adopted in the Altitude Privacy Policy is included at the end of this Privacy Statement.

Any time you do business with Altitude, or with anyone acting as an agent on our behalf, you are protected by the rights and safeguards contained in the Altitude Privacy Policy. (Click here to download the full Altitude Privacy Policy in pdf format)

**WHAT IS PERSONAL INFORMATION?**

"Personal information" is personally identifiable information such as your name, residential address and e-mail address and includes information about your product and service subscriptions and usage, credit information and billing records, service and recorded complaints.

Personal information is collected by Altitude only when you specifically and knowingly choose to provide it to us such as when you subscribe to an Altitude product or service. We may also receive personal information from our business partners and other third parties provided that such third parties confirm to us that they have obtained your consent to the disclosure of your personal information.

Publicly available information, such as a public directory listing of your name, address, telephone number and electronic address, is not considered personal information.

**COLLECTION AND USE OF PERSONAL INFORMATION**

Altitude collects and uses your personal information primarily for the purpose of providing you with the products and services you have requested from us.

Your personal information is used to communicate with you about your account and to provide you with information related to Altitude services. Your personal information would be used to contact you or to send you e-mail materials and other mailings about products and services that might be of interest to you. You always have the option, however, to tell us to exclude you from offers for other products or services.

If you enter a contest or other promotion offered by a Altitude or on an Altitude website, your personal information will be used to administer the promotion, including the use of your name and selected other information for the purposes of contacting, announcing and promoting the winners of the promotion.

Altitude may also contact you from time to time to conduct market research and surveys in an effort to continually improve our product and service offerings.

**Unless you specifically authorize us to release your personal information, or release is required or permitted by law, Altitude will not sell, lease or trade your personal information to other third parties.**

Anonymous or "non-personal" information gathered by Altitude through our websites may be used for technical, research and analytical purposes. Information collected through surveys, existing files and public archives may be used by Altitude to analyze markets and to develop or enhance service offerings.

Altitude will only ask for information about you that we need and will only ask for it when we need it. When we ask you for the information, we will explain to you why we need it and what we are going to do with it.

We will seek your prior consent to the collection, use and disclosure of the information as required by applicable privacy legislation. Subject to legal and contractual requirements, you can refuse to consent to our collection, use or disclosure of information about you. You may also withdraw your consent to any further collection, use or disclosure of information about you at any time by giving us reasonable notice. If our intended disclosures or uses of information change, we will notify you accordingly.

Your personal information will not be used for any other purpose without your consent.

**DISCLOSURE**

To enable us to more efficiently provide the products and services you have requested from us, Altitude may share your personal information with selected third parties who are acting on our behalf as our agents, suppliers or service providers. Such third party service providers are provided only with such information as is necessary in the circumstances. Information provided to third parties may be used only for the purpose stipulated and is subject to strict terms of confidentiality.

## **USE OF COOKIES**

Altitude uses a browser feature called a "cookie" to collect information anonymously and track user patterns on Altitude websites. A cookie is a small text file that is placed on your hard disk by a website. "Cookies" contain a unique identification number that identifies your browser, but not you, to our computers each time you visit one of our websites. Cookies tell us which pages of our websites are visited and by how many people.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on our websites.

## **ACCURACY**

Altitude will try to ensure that information about you is accurate, complete and up-to-date. However, please inform Altitude of any change of name, address or other information. In the event you have questions about the accuracy of factual information we have collected about you, you will have access to that information in order to verify and update it. If we have disclosed inaccurate information about you to a third party, we will be pleased to contact the third party in order to correct the information.

## **SECURITY**

Altitude is committed to protecting your privacy. Security measures, such as locked cabinets, restricted access and the use of passwords and encryption have been adopted to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Our employees have been trained to respect your privacy at all times and those employees with access to your personal information shall use your personal information strictly in accordance with the Altitude Privacy Policy and any laws applicable.

## **ACCESS**

If you have any questions about the collection, use or disclosure of your personal information by Altitude, or if you simply want to know whether we have any of your personal information on file, you may contact your local Privacy Compliance Officer. Except in limited circumstances, as specifically provided by applicable privacy legislation, Altitude can tell you whether they hold personal information about you. They can tell you the source of the information, allow you access to your personal information and find an account of the use that has been made or is being made of the information and the third parties to which it has been disclosed.

Altitude will only refuse access to information about you in those circumstances permitted or required by applicable privacy legislation. If Altitude refuses access to you, it will provide you with the reasons for its refusal upon request. Exceptions may include information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege. Altitude will respond to your requests for access in accordance with applicable privacy legislation.

## **QUESTIONS OR CONCERNS**

If you have any questions or concerns about the personal information about you held by Altitude or about the compliance by Altitude with the Altitude Privacy Policy, please contact your local [Privacy Compliance Officer](#). Contact information for your local Privacy Compliance Officer may be found on our website or by contacting Altitude.

Altitude has procedures in place to receive and respond to complaints or inquiries about its handling of personal information. They will describe the complaint procedures to anyone who makes inquiries or lodges complaints.

If you are not satisfied with the response from your local Privacy Compliance Officer after making a complaint, you may have recourse to additional remedies under applicable privacy legislation. For further information, please contact the federal Privacy Commissioner or your provincial Privacy Commissioner, as applicable. Contact information is available by contacting Altitude.

## **TEN PRINCIPLES OF FAIR INFORMATION PRACTICES**

**PRINCIPLE 1 - ACCOUNTABILITY** Altitude is responsible for the personal information under its control and shall designate one or more individuals who shall be accountable for the company's compliance with the procedures and principles set out in the Altitude Privacy Policy.

**PRINCIPLE 2 - IDENTIFYING PURPOSE** Altitude will identify the purpose for which personal information is collected at or before the time the information is collected. The purposes for which information is collected, used or disclosed by Altitude must be those that a reasonable person would consider are appropriate in the circumstances.

**PRINCIPLE 3 - CONSENT** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where consent is not required by privacy legislation as, for example, where the collection, use or disclosure of personal information is solely for journalistic, artistic or literary purposes.

**PRINCIPLE 4 - LIMITING COLLECTION** Altitude shall limit the collection of personal information to that which is necessary for the purposes identified by the company. Personal information shall be collected by fair and lawful means.

**PRINCIPLE 5 - LIMITING USE, DISCLOSURE AND RETENTION** Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of the purposes for which it was collected.

**PRINCIPLE 6 - ACCURACY** Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

**PRINCIPLE 7 - SAFEGUARDS** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

**PRINCIPLE 8 - OPENNESS** Altitude shall make readily available to its customers and employees specific information about its policies and practices relating to the management of personal information.

**PRINCIPLE 9 - INDIVIDUAL ACCESS** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information except where Altitude is permitted or required by law not to disclose personal information to the individual customer or employee. An individual customer or employee shall be able to challenge the accuracy and completeness of the information disclosed to him or her and have it amended as appropriate.

**PRINCIPLE 10 - CHALLENGING COMPLIANCE** An individual customer or employee shall be able to address a challenge concerning compliance with the principles in the Altitude Privacy Policy to his or her designated Privacy Compliance Officer.