

ISSUES INK PRIVACY CODE

Issues Ink's *Privacy Code* honours all applicable laws that protect your privacy, including the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA). Our *Privacy Code* is designed to comply with the privacy principles in Schedule 1 of PIPEDA. We have adopted this *Privacy Code* to explain our responsibilities with respect to your information.

PRIVACY PRINCIPLES

1. Accountability

Issues Ink is responsible for all personal information under our control. Our Chief Privacy Officer is to oversee our firm's compliance with the principles described in this *Privacy Code*. Each person is responsible for all personal information in his/her control. The Chief Privacy Officer will assist in training employees to comply with this *Privacy Code*.

2. Identifying Purposes

Issues Ink collects, uses, retains, and discloses information about our clients for the following purposes:

- to provide services or products that may be of interest to you in the process of running our business;
- to administer the billing and collection in the aspect of our relationship to you;
- to evaluate our performance;
- to respond to complaints against us that relate to the services we have provided to you;
- to meet legal, professional, and regulatory requirements;
- to carry out any other purpose that you have expressly or implicitly authorized.

3. Consent

Issues Ink will proceed to collect, use, retain, and disclose your information as a client as necessary for the purposes identified above and subject to your specific instructions. If you wish to expand, narrow, or withdraw your authorization to collect, use or disclose your information, Issues Ink will record your request and honour it, provided we have reasonable notice and can do so lawfully.

4. Limiting Collection

Personal information will ordinarily be collected directly from you and will be limited to what is necessary for the purposes identified in 2. above. We may also obtain information from third parties when you have expressly authorized us to do so.

5. Limiting Use, Disclosure, and Retention

We will share information about you among members of our staff and/or to third parties to the extent that is reasonably necessary to carry out the purposes identified above. We may disclose information about you to third parties when you have expressly authorized us to do so. We will not disclose more information about you than the legitimate purpose requires.

Issues Ink will retain your information as required by law, or for a period of time that is reasonably necessary for the purposes identified above.

6. Accuracy

It is important that we maintain the accuracy of any information in our possession. If any of your information changes, or if you discover any errors, please inform us immediately so we can take the appropriate actions.

7. Safeguards

Issues Ink endeavors to take reasonable measures to ensure that your information is secure from unauthorized access.

8. Openness

Issues Ink shall make readily available to individuals specific information about its policies and practices relating to the management of personal information. This information will be available to the public in an easily understood manner.

9. Individual Access

Upon request, we will ordinarily disclose to you, as a client, what information we have about you. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate. If Issues Ink denies an individual's request for access, we will state the reasons for the denial. Issues Ink will use its best efforts to respond to your request within thirty days. We will let you know if any charges apply in retrieving this information.

10. Challenging Compliance

SUBSCRIPTIONS

There will be no refunds for cancellations of magazine subscriptions.

If you have concerns about confidentiality and privacy, we want to know about them. Clients should address questions, concerns, or complaints involving privacy matters to the Privacy Officer at issues@issuesink.com.

Updating this *Privacy Code* – we reserve the right to make reasonable changes to our *Privacy Code* from time to time. Substantial changes will only come into effect after they have been posted for a reasonable period on our web site.

Effective January 1, 2004

Updated August 1, 2009