

Northstar Website Privacy Policy – Global

Overview

At NORTHSTAR RESEARCH PARTNERS, respecting privacy is an important part of our commitment to our clients, respondents and the general public.

All personal information derived through the course of a research project shall remain confidential - individual responses will be kept confidential and never linked to personal identifying information without the express permission of a respondent. Personal identifying information will never be sold to anyone. Respondents are free to choose whether or not to participate in a survey, free to choose not to answer any specific questions and free to discontinue participation at any time. Further, NORTHSTAR RESEARCH PARTNERS' field suppliers maintain a Do Not Contact (DNC) list that will exclude from future research (for the specified period of 3 years) any individual who indicates that they do not wish to be contacted for future research.

The NORTHSTAR RESEARCH PARTNERS Privacy Policy is a statement of principles and guidelines describing the level of protection of personal information provided by NORTHSTAR RESEARCH PARTNERS to its clients, respondents and the general public. The objective of the NORTHSTAR RESEARCH PARTNERS Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada).

NORTHSTAR RESEARCH PARTNERS will continue to review its Privacy Policy to make sure that it is relevant and remains current with changing industry standards, technologies and laws. NORTHSTARHUB.COM

Detailed Northstar Research Partners Privacy Policy Scope and Application

The ten principles that form the basis of The NORTHSTAR RESEARCH PARTNERS Privacy Policy are interrelated and NORTHSTAR RESEARCH PARTNERS shall adhere to the ten 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 The NORTHSTAR RESEARCH PARTNERS Privacy Policy has been drafted to reflect personal information issues specific to NORTHSTAR RESEARCH PARTNERS.

The scope and application of The NORTHSTAR RESEARCH PARTNERS Privacy Policy are as follows:

- The NORTHSTAR RESEARCH PARTNERS Privacy Policy applies to personal information collected, used, or disclosed by NORTHSTAR RESEARCH PARTNERS in the course of commercial activities.
- The NORTHSTAR RESEARCH PARTNERS Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.
- The NORTHSTAR RESEARCH PARTNERS Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by NORTHSTAR RESEARCH PARTNERS:
 - (a) non-personally identifiable information;
 - (b) the name, title, business address and/or telephone number of an employee of an organization; (c) 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 NORTHSTAR RESEARCH PARTNERS Privacy Policy is NORTHSTARHUB.COM

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 NORTHSTAR RESEARCH PARTNERS. 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 NORTHSTAR RESEARCH PARTNERS.

personal information: Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization, and does not include descriptive, factual information about an organization.

respondent: A member of the public who provides personal information to NORTHSTAR RESEARCH PARTNERS in the course of a survey conducted by NORTHSTAR RESEARCH PARTNERS. For example, a respondent is an individual who discloses personal information to NORTHSTAR RESEARCH PARTNERS in the course of quantitative or qualitative marketing or social research.

third party: An individual or organization outside of NORTHSTAR RESEARCH PARTNERS.

use: The treatment, handling, and management of personal information by and within NORTHSTAR RESEARCH PARTNERS or by a third party with the knowledge and approval of NORTHSTAR RESEARCH PARTNERS.

The Ten Principles of Privacy

Principle 1 - Accountability

NORTHSTAR RESEARCH PARTNERS is responsible for personal information under its control and shall designate one or more persons who are accountable for NORTHSTAR RESEARCH PARTNERS' compliance with the following principles. Responsibility for compliance with the provisions of the NORTHSTAR RESEARCH PARTNERS Privacy Policy rests with the NORTHSTAR RESEARCH PARTNERS Privacy Officer. Other individuals within NORTHSTAR RESEARCH PARTNERS 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. NORTHSTAR RESEARCH PARTNERS 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.

Principle 2 - Identifying Purposes for Collection of Personal Information

NORTHSTAR RESEARCH PARTNERS shall identify the purposes for which personal information is collected at or before the time the information is collected. NORTHSTAR RESEARCH PARTNERS collects personal information from the public only for the following purposes: (a) to conduct quantitative or qualitative marketing and social research; (b) to understand respondent opinions to establish suitability for further quantitative and qualitative marketing and social research; and (c) to meet legal and regulatory requirements. Further reference to "identified purposes" mean the purposes identified in this Principle. NORTHSTAR RESEARCH PARTNERS shall specify orally, electronically or in writing the identified purposes to the respondent at or before the time personal information is collected in a survey. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within NORTHSTAR RESEARCH PARTNERS who can explain the purposes. NORTHSTARHUB.COM 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 respondent will be acquired before the information will be used or disclosed for the new purpose. NORTHSTAR RESEARCH PARTNERS may provide clients or other third parties with information from any survey in aggregate form. In aggregate form it is impossible to identify an individual respondent's personal information.

Principle 3 - Obtaining Consent for Collection, 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 respondents in survey research is always voluntary. When a respondent agrees to participate in a survey, he/she gives consent to the interview by participating. Generally, any personal information collected in the course of an interview is not disclosed to third parties. However, occasionally, a client sponsoring a research project may want to contact respondents directly. In these cases, NORTHSTAR RESEARCH PARTNERS always explains the reason for the disclosure to the respondent and obtains express permission from the respondent before making any such disclosure. A respondent is always free to choose whether or not to participate in a survey, free to choose not to answer any specific questions and free to discontinue participation at any time. In obtaining consent, NORTHSTAR RESEARCH PARTNERS shall use reasonable efforts to ensure that a respondent is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the respondent. Generally, NORTHSTAR RESEARCH PARTNERS shall seek consent to use and disclose personal information at the same time it collects the information. However, NORTHSTAR RESEARCH PARTNERS 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, NORTHSTAR RESEARCH PARTNERS shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents.

Principle 4 - Limiting Collection of Personal Information

NORTHSTAR RESEARCH PARTNERS shall limit the collection of personal information to that which is necessary for the purposes identified by NORTHSTAR RESEARCH PARTNERS. NORTHSTAR RESEARCH PARTNERS shall collect personal information by fair and lawful means. In conducting surveys, NORTHSTAR RESEARCH PARTNERS limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to individuals.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

NORTHSTAR RESEARCH PARTNERS shall not use or disclose personal information on NORTHSTARHUB.COM. NORTHSTAR RESEARCH PARTNERS 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.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. Personal information used by NORTHSTAR RESEARCH PARTNERS shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a respondent. NORTHSTAR RESEARCH PARTNERS shall update personal information about respondents and employees as necessary to fulfill the identified purposes or upon notification by the individual.

Principle 7 - Security Safeguards

NORTHSTAR RESEARCH PARTNERS shall protect personal information by security safeguards appropriate to the sensitivity of the information. NORTHSTAR RESEARCH PARTNERS 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. NORTHSTAR RESEARCH PARTNERS shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used. All of NORTHSTAR RESEARCH PARTNERS' employees with access to personal information shall be required to respect the confidentiality of that information. NORTHSTARHUB.COM

Principle 8 - Openness Concerning Policies and Procedures

NORTHSTAR RESEARCH PARTNERS shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information. NORTHSTAR RESEARCH PARTNERS shall make information about its policies and procedures easy to understand, including: (a) the title and address of the person or persons accountable for NORTHSTAR RESEARCH PARTNERS' 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 NORTHSTAR RESEARCH PARTNERS; (c) a description of the type of personal information held by NORTHSTAR RESEARCH PARTNERS, including a general account of its use; and (d) a description of what personal information is made available to related organizations (e.g. subsidiaries).

Principle 9 – Individual Access to Personal Information

Upon request, NORTHSTAR RESEARCH PARTNERS shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate. Upon written request to the Privacy Officer, NORTHSTAR RESEARCH PARTNERS will inform an individual of the existence, use and disclosure of his/her personal information and shall be given access to that information. In certain situations, NORTHSTAR RESEARCH PARTNERS may not be able to provide access to all the personal information that it holds about a respondent. For example, NORTHSTAR RESEARCH PARTNERS 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, NORTHSTAR RESEARCH PARTNERS may not provide access to information if disclosure would reveal confidential commercial information. NORTHSTARHUB.COM In order to safeguard personal information, a respondent may be required to provide sufficient identification information to permit NORTHSTAR RESEARCH PARTNERS 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. NORTHSTAR RESEARCH PARTNERS 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, NORTHSTAR RESEARCH PARTNERS shall transmit to third parties having

access to the personal information in question any amended information or the existence of any unresolved differences. Respondents and employees can obtain information or seek access to their individual files by contacting the NORTHSTAR RESEARCH PARTNERS Privacy Officer.

Principle 10 - 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 NORTHSTAR RESEARCH PARTNERS' compliance with the NORTHSTAR RESEARCH PARTNERS Privacy Policy. NORTHSTAR RESEARCH PARTNERS shall maintain procedures for addressing and responding to all inquiries or complaints from its respondents regarding NORTHSTAR RESEARCH PARTNERS' handling of personal information. NORTHSTAR RESEARCH PARTNERS shall, on written request, inform its respondents about the existence of these procedures as well as the availability of complaint procedures. The person or persons accountable for compliance with the NORTHSTAR RESEARCH PARTNERS Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints. NORTHSTAR RESEARCH PARTNERS shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, NORTHSTAR RESEARCH PARTNERS shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The respondent shall be informed of the outcome of the investigation regarding his or her complaint.

Additional Information

For more information regarding the NORTHSTAR RESEARCH PARTNERS Privacy Policy, please contact the NORTHSTAR RESEARCH PARTNERS Privacy Officer by e-mail at global@northstarhub.com, or by mail at 18 King Street East, Suite 1500, Toronto, ON M5C 1C4.