

-INTERNET ACCESS SOLUTIONS LTD.

PRIVACY POLICY

Overview

Internet Access Solutions Limited (IASL) is committed to safeguarding the right of our customers and employees to privacy and the protection of their personal information. IASL's Privacy Policy is enacted pursuant to the Personal Information Protection and Electronic Documents Act (PIPEDA) which contains 10 principles that outline the responsibilities that organizations should follow pursuant to the use of personal information. These are:

- Accountability
- Identifying purposes
- Consent
- Limiting collection
- Limiting use, disclosure, and retention
- Accuracy
- Safeguards
- Openness
- Individual access
- Challenging compliance

Personal Information

Personal information includes information about an identifiable individual, presented in any form, such as: age, name, ID number(s), income, ethnic origin, opinions, evaluations, social status, disciplinary actions, credit records, loan records, medical records.

IASL POLICY

1. Accountability

IASL is responsible for personal information under our control.

IASL is also responsible for any personal information transferred to third parties for processing on their behalf and will use contractual or other means to provide a comparable level of protection.

IASL will designate one or more persons to be accountable for compliance with these principles.

IASL will identify internally the person, or persons, to be accountable for compliance. IASL will identify to users a method to contact such person or persons. Other individuals within IASL may act on behalf of the designated person or take responsibility for the day-to-day collection and management of personal information.

IASL will establish as necessary policies and procedures to implement and comply with their own privacy codes, such as procedures for the collection, handling, storage and destruction of personal information; to train staff and to deal with complaints; and to explain IASL's policies and practices.

2. Identifying the purposes for collection of personal information

IASL will identify the purposes of collecting personal information, before or at the time the information is collected. IASL may collect personal information for any specified purpose. Generally, IASL collects personal information for the following purposes:

- to establish and maintain responsible commercial relations with users and to provide ongoing service
- to understand user needs

- to develop, enhance, market or provide products and services
- to manage and develop IASLs business and operations
- to meet legal and regulatory requirements

IASL will identify the purposes for the collection, use and disclosure of personal information electronically, in writing or orally, and in language that users can easily understand.

IASL will not use or disclose personal information for any new purpose beyond that for which it was originally collected without first identifying and documenting the new purpose and getting the user's consent.

3. Consent

The knowledge and consent of the user are required for the collection, use or disclosure of personal information, except where inappropriate.

In certain circumstances, however, IASL may collect, use or disclose personal information without the user's knowledge and consent, for example:

- when it is clearly in the interest of the user and consent cannot be obtained in a timely way, such as in a medical emergency;
- when the life, health or security of another individual is threatened;
- if seeking consent might defeat the purpose, such as for the investigation of a breach of an agreement or law;
- when disclosure is to the IASLs lawyer to collect a debt, to comply with a court order, or as may otherwise be required by law.

IASL will use reasonable efforts to inform users how the personal information collected will be used and disclosed.

Generally, IASL will seek consent to use and disclose personal information at the same time it collects it. Sometimes, however, IASL may identify a new purpose and seek consent to use and disclose personal information after it has been collected.

A user's consent can be expressed, implied, or given through an authorized representative. In determining the appropriate form of consent, IASL will take into account the sensitivity of the information and the reasonable expectations of a user.

IASL will provide full and fair disclosure of its collection use and disclosure pursuant to these principles and will not deceive a user into giving consent.

A user can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. IASL should inform users of the implications of withdrawing consent and how to do so.

4. Limits for collecting personal information

IASL will collect only the amount and type of personal information needed for the purposes they have identified.. IASL will collect personal information using procedures that are fair and lawful.

If IASL collects clickstream data that will be linked with other personal information about a user, IASL will advise users what information is being collected and how it will be used. Otherwise, the collection, use or disclosure of clickstream data is not restricted.

Although IASL may collect personal information primarily from users, it may also collect personal information from other sources including credit bureaus, or other third parties that represent that they have the right to disclose the information.

5. Limits for using, disclosing, and keeping personal information

IASL will use or disclose personal information only for the purposes it was collected, unless a user gives consent or as required by law.

IASL may disclose personal information without consent when required to do so by law, e.g. subpoenas, search warrants, other court and government orders, or demands from other parties who have a legal right to personal information, or to protect the security and integrity of its network or system. In such circumstances, IASL will protect the interests of its users by making sure that:

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- orders or demands appear to comply with the laws under which they were issued; and
- it discloses only the personal information that is legally required, and nothing more.

IASL may notify users that an order has been received, if the law allows it.

Only employees of IASL with a business need to know, or whose duties so require, will be granted access to users' personal information.

IASL will keep personal information only as long as necessary to fulfill the identified purposes.

IASL will keep reasonable controls, schedules and practices for information and records retention, and will destroy, erase or make anonymous within a reasonable period of time any personal information no longer needed for its identified purposes or for legal requirements.

6. Keeping personal information accurate

IASL will keep personal information as accurate, complete and up-to-date as necessary for the purposes for which it is to be used.

IASL may rely exclusively on the representations provided by their users in determining the completeness, accuracy, and timeliness of the personal information. This Principle does not imply any obligation on IASL to seek independent verification of any personal information supplied by the user.

7. Safeguarding personal information

IASL will protect personal information with safeguards appropriate to the sensitivity of the information.

IASL will use appropriate safeguards to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction.

8. Making information about policies and procedures available to users

IASL will be open about the policies and procedures they use to manage personal information. Users will have access to information about these policies and procedures and the information will be easy to understand.

IASL will make reasonable efforts so that users are made aware of the existence and location of their policies. Such efforts may include posting policies online and making available information on how to access and correct personal information.

9. Providing user access to personal information

When users request it, IASL will tell them what personal information IASL has about the user, what it is being used for, and to whom it has been disclosed, and will give them access to their information.

In certain situations, however, IASL may not be able to give users access to all personal information they hold about the user, e.g.:

- if it might reveal personal information about another user or could threaten the life or security of another individual;
- if it might reveal confidential commercial information;
- if the information is protected by solicitor-client privilege;
- if the information was generated in the course of a formal dispute resolution process; or
- if the information was collected in relation to the breach of an agreement or a law.

IASL will explain the reasons for denying access when users ask.

In providing an account of the use and disclosure of personal information, IASL should state the source of the personal information where reasonably possible. IASL will provide a list of the third parties to which it may have disclosed the user's personal information when it is not possible to provide an actual list.

In responding to a user's request, IASL will provide personal information in an understandable form, within a reasonable time and at minimal or no cost to the user.

Users will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

IASL will keep records of any unresolved challenges regarding a user's personal information. IASL will ensure that all subsequent transmissions of personal information shall include any amended information or the existence of any unresolved challenges. Where appropriate, IASL will transmit to third parties having access to the personal information in question any amended information and the existence of any unresolved challenges.

10. Handling users' complaints and questions

Users may challenge a IASLs compliance with its own privacy code.

IASL will have policies and procedures to receive, investigate and respond to users' complaints and questions. IASL will make their complaint escalation process known to their users.

IASL will respond to all complaints and questions in a timely manner under the circumstances.