

CANADIAN LAND ACCESS SYSTEMS INC.

PRIVACY POLICY

INTRODUCTION

Canadian Land Access Systems Inc. (referred to as “**CLAS**”, “**we**”, “**us**”, and “**our**”) recognizes that your right to privacy is an important issue. We understand your interest in maintaining and protecting your private information. As a result, CLAS manages your personal information as described in this Privacy Policy.

This Privacy Policy provides you with the safeguards set forth in the Alberta *Personal Information Protection Act* (PIPA) and other applicable personal information protection legislation (“**Privacy Laws**”). Nothing in this Privacy Policy will limit CLAS’ rights and obligations pursuant to such Privacy Laws.

CLAS provides an online platform connecting Land-Owners and Land-Users to facilitate land access as between Land-Owners and Land-Users where permitted (the “**Services**”), which Services are accessible at www.canadianlandaccess.com and any other websites through which CLAS makes the Services available (the “**Websites**”), and through applications for mobile, tablet and other smart devices and application program interfaces (the “**Applications**”, and collectively with the Websites, the “**Site**”). This Privacy Policy applies solely to the Services and the Site, the management of personal information in any form whether oral, electronic or written and does not apply to information that is protected by other CLAS policies and practices or through contractual arrangements, unless specifically provided in such contractual arrangements. The Services and Site are not intended for use by anyone under the age of 18.

YOUR CONSENT

CONSENT

BY CLICKING ON THE APPROPRIATE BUTTON BELOW OR BY SUBMITTING PERSONAL INFORMATION TO CLAS OR ITS SERVICE PROVIDERS AND AGENTS, YOU ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTAND THIS PRIVACY POLICY, CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW) UNDER THE TERMS OF THIS PRIVACY POLICY, AND AGREE THAT CLAS AND ITS SERVICE PROVIDERS AND AGENTS MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY PRIVACY LAWS. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the CLAS Privacy Officer. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide CLAS or its service providers and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

Please note that, where CLAS has requested your consent to collect, use or disclose your personal information in circumstances where such consent is not required under Privacy Laws, or CLAS has otherwise done anything relative to your personal information not strictly required of it under Privacy Laws or obligations, CLAS does not waive its rights under such Privacy Laws as a result thereof.

KEY TERMS

Unless otherwise specified, the terms below have the following meaning:

“**Access Request**” means a request by a Land-User to the Land-Owner to access the Property listed in such Land-Owner’s Listing.

“**CLAS Sign**” means a sign created by CLAS located on a Property for which a Land-Owner has registered a Listing and containing a barcode which is to be scanned by Land-Users accessing the Property.

“**Land-User**” means a User who requests from a Land-Owner access to a Property via the Site.

“**Land-Owner**” means a User who creates a listing via the Site and is the owner, or duly authorized agent of the owner, of the property included in the Listing.

“**Listing**” means a Property that is listed by a Land-Owner as available to be accessed via the Site.

“**Property**” means any parcels or tracts of land and premises.

“**User**” or “**you**” means any person that uses or accesses the Site or Services, including Land-Owners and/or Land-Users as the context requires, whether or not such person becomes a registered user of the Services.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal Information Definition: Personal Information is information about *an identifiable individual*, as defined in applicable Privacy Laws. Generally speaking, personal information does not include:

- a) anonymous or aggregated information that does not allow an individual to be identified;
- b) information regarding companies and other “legal persons”; or
- c) business contact information such as your name, title or position, business address, telephone number, fax number or email address.

The types of personal information that CLAS may collect from you from time to time include: your name, your home address, telephone number, personal email address, gender, birthdate, billing and account information (such as credit card, or bank account number), your mailing preferences, delivery instructions, license plate number, and customer service preferences. CLAS will also collect the personal information you provide in order to access the Services or Site. Additionally, from time to time, we may ask you to provide us with more detailed information regarding your interests, occupation and background. For example, we sometimes ask our customers to complete surveys in order to get a better sense of who they are and what issues, products or services may be of interest to our customers.

THE PRIVACY PRINCIPALS CLAS FOLLOWS

CLAS collects uses and discloses your personal information by employing “fair information practices” as described in the following ten privacy principles and embodied in Privacy Laws:

1. **Accountability:** CLAS is responsible for personal information under its control and as a result has designated an individual as the person who is accountable for CLAS’ compliance with the ten principles (“**Privacy Officer**”). As such:
 - a) accountability for CLAS’ compliance with the principles rests with the Privacy Officer, even though other individuals within CLAS may be responsible for the day-to-day

collection and processing of personal information. In addition, other individuals within CLAS may be delegated to act on behalf of the Privacy Officer;

- b) the identity of the Privacy Officer designated by CLAS to oversee CLAS' compliance with the principles shall be made known upon request; and
- c) CLAS is responsible for personal information in its possession or custody, including information that has been transferred to a third party for processing. CLAS shall use contractual or other means to provide a comparable level of protection while the information is being processed by a third party.

2. **Identifying Purposes:** In general, CLAS collects uses and discloses personal information about you in order to provide you with the Services and access to the Site. More specifically, CLAS collects, uses and discloses your personal information for the following purposes:

- a) to connect Land-Owners and Land-Users and to facilitate possible land access as between Land-Owners and Land-Users in accordance with applicable laws;
- b) to establish and maintain commercial relationships with customers, clients, suppliers and other third parties, including to issue invoices, administer accounts, collect and process payments, and to fulfill contractual and legal obligations;
- c) to develop and manage our business and operations. This may include the sharing of personal information by and between CLAS personnel and affiliated companies, and with third party service providers and agents, for such purposes;
- d) to detect and protect CLAS and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with CLAS' policies and contractual and legal obligations;
- e) to distribute our newsletters and other material to individuals on our mail and email lists, including via third party mailing houses and email service providers;
- f) to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving CLAS;
- g) to understand and respond to customer, clients, supplier and other third party needs and preferences, including to contact and communicate with such parties and to conduct surveys, research and evaluations;
- h) to develop, enhance, market, sell or otherwise provide CLAS' products and services;
- i) to market, sell or otherwise provide products and services of third parties with whom CLAS has a commercial relationship;
- j) as permitted by, and to comply with, any legal or regulatory requirements or provisions; and
- k) for any purpose to which you consent.

CLAS will collect, use and disclose only that personal information necessary for the purposes that have been identified.

3. **Consent:** The knowledge and consent of the individual is required for the collection, use, or disclosure of personal information, except as permitted by Privacy Laws. Pursuant to this Privacy Policy, you acknowledge your consent to CLAS' collection, use and disclosure of your personal information, or the personal information of another individual which you provide to CLAS, as stated above. You acknowledge that to submit an Access Request or create a listing on the Site, you must first register and create a CLAS account ("**CLAS Account**"). Users who create a CLAS Account and use the Services and Site will be required to provide CLAS with certain personal information. By your use of the Services and the Site and/or creation of a CLAS Account, you consent to CLAS' collection, use and disclosure of your personal information for the purposes set forth in Section 2.

Generally, should a different purpose to the collection, use or disclosure of your personal information be proposed by CLAS, CLAS shall seek your consent at the same time it collects the information. However, CLAS may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed, for a new purpose. You may withdraw consent at any time to some or all of the purposes indicated below, subject to legal or contractual restrictions and reasonable notice. Please note, however, that in some circumstances, we may not be able to provide you with the Services or access to the Site if you withdraw your consent to our use of your personal information.

NOTE: In certain circumstances under Privacy Laws, personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information.

4. **Additional Personal Information Collected by CLAS.** Other personal information we collect may include but is not limited to:
- a) Additional (optional) member registration information and other contact information.
 - b) Location information including GPS location information.
 - c) Application usage information.
 - d) Payment information including certain billing information (such as credit card or bank account number and address).
 - e) Certain diagnostic or other technical information concerning your handheld device, including operating system and application system software information and environment information, location information, hardware IDs and model numbers, Wi-Fi, radio or wireless strength and connections, list of installed applications, program or application usage information, data regarding processes running and device configuration, system events, and other information regarding the condition of your mobile device that may be helpful for diagnostic purposes (all of which may include your personal information) ("**Technical Data**").
 - f) Access to past data you submitted or attempted to submit through the Site, or that was created through use of the Site.

CLAS may also collect non-personal technical information including, but not limited to, your mobile carrier information. None of the foregoing information by itself or together can be tracked to a specific individual's personally identifiable information.

5. **Must be Over the Age of 18.** The Services and Site are not intended for use by anyone under the age of 18, and CLAS will not knowingly collect personal information from anyone under the age of 18. If you believe an individual under the age of 18 has provided us with personal information please contact us at privacy@canadianlandaccess.com. We will remove such information from our database.
6. **Limiting Collection:** The collection of personal information shall be limited to that which is necessary for the purposes identified by CLAS. Information shall be collected by fair and lawful means and may be collected from other sources including but not limited to credit bureaus or other third parties who represent that they have the right to disclose the information. In most cases, collection shall be pursuant to appropriate contractual arrangements.

CLAS may use personal information to create a customized experience for you, such as by suggesting Listings and any other information necessary to facilitate the provision of the Services. CLAS may also provide information about promotions, special officers and additional services. You may choose to stop receiving such proportional correspondence at any time by providing us with notice. CLAS may still contact you as necessary to service your CLAS Account.

7. **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 or permitted by Privacy Laws. Personal information shall be retained only as long as necessary for the fulfillment of those purposes or as required by law.

CLAS may collect from and/or disclose your personal information to:

- a) a person who, in the reasonable judgment of CLAS, is providing or seeking the information as your agent;
- b) any of the companies and business entities that form part of CLAS;
- c) an organization or individual retained by CLAS to perform functions on its behalf, such as contractors, consultants, auditors, software developers (including web-site developers and hosts), data processing, document management and office services;
- d) an organization or individual retained by CLAS to evaluate your creditworthiness or to collect debts outstanding on an account;
- e) a financial institution, on a confidential basis and solely in connection with the assignment of a right to receive payment, the provision of security or other financing arrangements;
- f) our auditors and professional advisors;
- g) another person or corporation as part of conducting business together or pursuant to the sale of all or substantially all of CLAS' assets related to one or more specific lines of business, subject to the other person or corporation agreeing to manage personal information in accordance with Privacy Laws;
- h) another company or person for the development, enhancement, marketing or provision of any of CLAS's products or services;
- i) an agent or third party retained by CLAS in connection with CLAS 's administration or the provision of CLAS 's products or services;
- j) credit grantors and reporting agencies; and

- k) a public authority or agent of a public authority, if in the reasonable judgment of CLAS, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of this information.

Except as permitted in this principle, CLAS does not provide or sell its customer or client lists to any outside company for use in marketing or solicitation.

- 8. **Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is possible. CLAS will update personal information as and when necessary to fulfill the identified purposes or upon notification from you. CLAS will not routinely update personal information, unless such process is necessary to fulfill the identified purposes. If ever your contact and/or other personal information changes please feel free to contact us so that we can update our records.
- 9. **Safeguards:** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information. The security safeguards are designed to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The nature of the safeguards will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage. The methods of protection include:
 - a) physical measures, such as locked filing cabinets and restricted access to offices;
 - b) organizational measures, such as security clearances and limiting access on a “need-to-know” basis; and
 - c) technological measures, such as the use of passwords, firewalls and encryption.

CLAS will take all reasonable security measures to protect and safeguard your personal information from unauthorized access, use, modification, damage or destruction. Transmission of information via the Internet is not completely secure and CLAS cannot guarantee the security of your personal information in that regard. By using the Services, Site and/or creating your CLAS Account, you acknowledge these security risks and agree to use the Services and Site at your own risk.

- 10. **Openness:** CLAS shall make readily available to you information about its Privacy Policy and practices relating to the management of personal information. For example:
 - a) CLAS shall be open about its Privacy Policy and practices with respect to the management of personal information. This information shall be made available in a form that is generally understandable;
 - b) the information made available shall include:
 - i) the name or title, and the address, of the Privacy Officer to whom complaints or inquiries can be forwarded;
 - ii) the means of gaining access to personal information held by CLAS;
 - iii) a description of the type of personal information held by CLAS, including a general account of its use;
 - iv) a copy of any brochures or other information that explain CLAS’s policies, standards, or codes; and

- v) what personal information is made available to related organizations, i.e.: affiliated companies; and
 - c) CLAS may make information on its Privacy Policy and practices available in a variety of ways. The method chosen depends on the nature of its business and other considerations. For example, CLAS may choose to make brochures available in its place of business, mail information to its customers, provide online access, or establish a toll-free telephone number.
11. **Individual Access:** Upon request, subject to certain exceptions under Privacy Laws, you shall be informed of the existence, use, and disclosure of your personal information and shall be given access to that information. You may wish to challenge the accuracy and completeness of the personal information and have it amended as appropriate.
- NOTE: In certain situations, under Privacy Laws, CLAS may not be able to provide access to all of your personal information it holds. The reasons for denying access will be provided to you upon request. Exceptions may include information that is prohibitively costly to provide, 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.
12. **Challenging Compliance:** You may wish to address a concern regarding CLAS's compliance with the above principles to CLAS's Privacy Officer. CLAS shall investigate all complaints. If a complaint is found to be justified, CLAS shall take appropriate measures to resolve the complaint, including, if necessary, amending this Privacy Policy and practices.

PRIVACY AND OUR WEBSITES

Cookies – When you access the Site and any other website through which CLAS makes its Services available, we may use a browser feature called a “cookie” to collect information, such as the type of Internet browser and operating system you use, the domain name of the website from which you came, date and duration of the visit, number of visits, average time spent on the Site, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies your browser, but not necessarily you, to our computers each time the Site is visited. Unless you specifically inform us (e.g. by registering for a CLAS Account or sending us correspondence from the Site) we will not know who you are. In addition to the identified purposes described in our Privacy Policy, we may use the Site information and share it with other organizations with whom we have a commercial relationship to measure the use of the Site, to improve the functionality and content of the Site and to facilitate usage by you. You can reset your browser either to notify you when you have received a cookie or refuse to accept cookies. However, if you refuse to accept cookies, you may not be able to use some of the features available on the Site.

Online Communications – In order to provide you with products, services or information, you may voluntarily submit personal information to us through the Site for purposes such as conducting business online or through the Application, subscribing for services, purchasing items, asking a question, obtaining information, reviewing or downloading a publication, participating in an event, and participating in contests and surveys. If you register for a CLAS Account, we may combine and store personal information about your use of the Site and the online information you have provided with certain other online and offline information we may have collected. All collection, use and disclosure of personal information obtained through the Site shall be subject to this Privacy Policy and Privacy Laws.

NOTE: CLAS has engaged Moneris Solutions (the “**Payment Processor**”) as its online payment solution provider. The Payment Processor collects the data and personal information you submit when conducting business on the Site such as payment for subscriptions or CLAS Signs, viewing or creating a Listing, asking a question, obtaining information, reviewing or downloading a publication, participating in an event, and participating in contests and surveys. The Payment Processor will maintain ownership over this

information and data. The Payment Processor will not sell any personal information that it collects. By submitting your personal information on the Site you consent to such transfer and storage. Please review the Payment Processor privacy policy for more information about how Payment Processor collects, uses and discloses personal information at https://shop.moneris.com/en/privacy_policy/. CLAS shall not be responsible or liable, directly or indirectly, for any damage or loss suffered by you which is caused or alleged to be caused by or in connection with the Payment Processor's privacy policy, content on its website generally or how it collects, uses or discloses personal information and data.

Email Communications – Occasionally, CLAS may send marketing or promotional email communications to you with information that may be useful, including information about the Services of CLAS and other third parties with whom we have a relationship. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from CLAS.

Links – The Site may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than CLAS, and CLAS has no responsibility for such third party websites regarding its privacy policies on its content generally.

CHANGES TO THE PRIVACY POLICY

CLAS reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post the revised Privacy Policy on the Site. We will provide to you such revised Privacy Policy upon request to the Privacy Officer. However, CLAS will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which your consent has previously been obtained unless otherwise required or permitted by Privacy Laws.

FURTHER INFORMATION

CLAS has appointed a Privacy Officer to oversee compliance with this Privacy Policy and applicable Privacy Laws. For information on CLAS' privacy practices, please contact our Privacy Officer at:

Eric Gerstenbuhler
PO Box 36
Lethbridge, Alberta, Canada
T1J 3Y3
e-mail: privacy@canadianlandaccess.com
phone: 1.844.357.CLAS (2527)