

Logico Carbon Solutions Inc.
Personal Information Protection Policy

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Commitment to Protection of Personal Information

At Logico, we are committed to providing our customers with exceptional service. As providing this service may involve the collection, use and disclosure of some personal information about our customers, protecting their personal information is one of our highest priorities.

Logico Carbon Solutions Inc. (“Logico”) is a Canadian company incorporated under the laws of British Columbia.

Logico complies with the privacy laws of Province of British Columbia and the Government of Canada, including the Personal Information Protection Act (PIPA) of the Province of British Columbia, the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Anti-Spam Law (“CASL”) of the Government of Canada.

We will inform our customers of why and how we collect, use and disclose their personal information, obtain their express consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting customers’ personal information. Our privacy commitment includes ensuring the accuracy, confidentiality and security of our customers’ personal information and allowing our customers to request access to, correction and deletion of, their personal information.

Scope of this Policy

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Logico.

Definitions

Personal Information – means information about an identifiable individual as defined by the applicable Acts and includes name, age, home address and phone number. Personal information does not include contact information as described below.

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email address or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated with responsibility for ensuring that Logico Carbon Solutions complies with this policy, PIPA and PIPEDA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the customer voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect the name, work address, work phone number and work email address of an authorized

representative of the customer in order to fulfill the following purposes:

- To verify identity;
- To verify creditworthiness;
- To open and manage an account;
- To enrol the client in a program;
- To ensure a high standard of service to our customers;
- To meet regulatory requirements.

Policy 2 – Consent

- 2.1 We will obtain customer explicit consent to collect, use or disclose personal information except where, as noted below, we are authorized to do so without consent.
- 2.2 Consent can be provided orally, in writing, electronically, through an authorized representative or implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the customer voluntarily provides personal information for that purpose.
- 2.3 Subject to certain exceptions, such as if the personal information is necessary to provide the service or product, or if the withdrawal of consent would frustrate the performance of a legal obligation, customers can withhold or withdraw their consent for Logico to use their personal information in certain ways. A customer's decision to withhold or withdraw consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the customer in making the decision.
- 2.5 We may collect, use or disclose personal information without the customer's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health or personal security;
 - When the personal information is available from a public source, such as a telephone directory;
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use customer personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes, such as:
 - To conduct customer surveys in order to enhance the provision of our services;
 - To contact our customers directly about products and services that may be of interest to them.
- 3.2 We will not use or disclose customer personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell, lease, barter or trade customer lists or personal information to other parties or otherwise share customer lists or personal information.

Policy 4 – Retaining Personal Information

- 4.1 If we use customer personal information to make a decision that directly affects the customer, we will retain that personal information for at least one year during which period the customer can request access to it.
- 4.2 Subject to policy 4.1, we will retain customer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that customer personal information is accurate and complete where it may be used to make a decision about the customer or disclosed to another organization.
- 5.2 Customers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing to Logico's Privacy Officer at the address provided below and provide sufficient detail to identify the personal information and the correction being sought.

- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the customer's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of customer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that customer personal information is appropriately protected:
- the use of user IDs, passwords, encryption and firewalls;
 - restricting access to personal information on a need to know basis.
- 6.3 We will use appropriate security measures when destroying customer personal information such as deleting electronically stored information
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Customers Access to Personal Information

- 7.1 Customers have a right to access their personal information, subject to limited exceptions, such as solicitor-client privilege or where disclosure would reveal personal information about another individual.
- 7.2 A request to access personal information must be made in writing to the Privacy Officer and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell customers how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the customer of the cost and request further direction from the customer on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the customer in writing, providing the reasons for refusal and the recourse available to the customer.

Policy 8 – Questions and Complaints

- 8.1 The Privacy Officer is responsible for ensuring Logico's compliance with this policy and relevant legislation.
- 8.2 Customers should direct any complaints, concerns or questions regarding Logico's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the customer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Logico's Privacy Officer
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