

Your privacy is important to us. Please review the information below on how Arrow Technology Group LP (called, "Arrow" in this policy) protect your personal information, including how you can tell us your privacy preferences and how you can raise any questions or complaints.

**By providing personal information to us and by dealing with us with knowledge of this Privacy Policy, you consent to the collection, use and disclosure of your personal information in accordance with the terms set out in this Privacy Policy unless you advise us otherwise.**

### **Your Privacy is Protected**

Keeping our customers' information and affairs in strict confidence is a cornerstone of Arrow business.

In the following pages we describe these policies and procedures and how we put them into practice so that you have control over how we collect, use and disclose your information.

### **Protecting your Privacy Means:**

- we keep your information and the business you do with us in strict confidence
- your information is not sold
- you have control over how we obtain, use, and give out information about you
- you have access to the information we have about you
- we respect your privacy when we market our products and services

### **Our Privacy Policies Protect All of Our Customers**

Upon Becoming an Arrow Customer and upon Acquiring New Products and Services, in Addition to your Name, Address and Phone Number, you agree to Provide us with all Information Needed to:

- establish your identification
- protect you and us from error and fraud
- understand your needs
- recommend particular products and services to meet your needs
- provide ongoing service
- comply with legal requirements
- manage the means by which you pay us
- offer other products or services that are suitable to your needs using various methods of communication
- Full ten(10) digit Status numbers are need if Arrow is to exempt you from GST on all products and services purchased with Arrow Technology Group.

We collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances.

### **For the Following Purposes Your Information is Obtained or Used Only With Your Consent**

We obtain your consent before we:

1. using identification information and contact information, such as your name, address, telephone number and e-mail address so that we can identify you and deliver the products and services that you request and to communicate with you regarding those products and services;
2. using payment method preferences and related financial information that you provide to us so that we can obtain payment for the products and services that you request. However, we will obtain your prior explicit consent to the collection and use of credit or other financial information in order to assess your credit risk or to obtain your credit rating;
3. using information relating to your preferences so that we are able to deliver our products and services to you in accordance with those preferences;
4. using customer relationship information such as your service requests, comments and feed-back to assist us in delivering products and services in accordance with your wishes;
5. using personal information for the purpose for which it was provided and certain other activities that are reasonably ancillary to that purpose. For example, if you send us an e-mail with a question or comment, Arrow will use your e-mail address to respond to you. Further, Arrow may store your e-mail and e-mail address and a copy of our response for future reference;
6. using your postal and/or e-mail address to provide to you information about Arrow's' products and services and other items (including the products and services of third parties) that Arrow believes that you may be interested in notwithstanding that your address may have been provided for a different purpose;
7. analyzing your personal information to assist us in developing and enhancing our products and services and our website; and
8. Arrow your personal information to assist us in conducting market analysis and strategic planning.

Except as otherwise provided in this Privacy Policy, Arrow will not use your personal information for any other purpose.

### **Your Consent Can Be Express Or Implied**

#### **Express consent can be verbal or written.**

You imply consent when we can reasonably conclude that you've given consent by some action you've taken, or when you decide not to take action. For example, if we sign up for internet services, we can conclude that you have consented to the conditions. If we give you an

opportunity to tell us you don't want direct marketing material and you don't tell us that you don't want us to send it, we can conclude that you have no objection.

We will rely on your implied consent to use and disclose identifying information about you, such as your name and address.

### **You Can Withdraw Your Consent After You've Given It**

You can withdraw your consent any time after you've given it to us, provided there are no legal requirements to prevent this. However, in order to maintain the integrity of the credit reporting system, we do have to update your credit information with billing as long as you have credit card monthly withdrawals with us. Your consent for this purpose cannot be withdrawn during this time.

If you don't consent to certain uses of information, or if you withdraw your consent, we may not be able to provide you with a particular product or service. If so, we'll explain the situation to you to help you with your decision.

### **We Ask for Your Consent Before Sharing Information With Other People**

We don't share information about you, or release it to anyone outside of Arrow without your consent. For example, we give information to Moneris to process credit card payments only with your consent.

There are some exceptions to the above rules. For example, we may collect, use or disclose information without your consent if we:

- 1. must disclose information for legal reasons**

We may be compelled to release information by a court of law, or other legal or regulatory authority. If so, our policy is to release information only to the extent that we have to.

- 2. have to protect the interests of Arrow**

In certain circumstances, Arrow may have to collect, use or release information for its protection. For example, we may do so when returning a cheque for the reason "Not Sufficient Funds", when collecting an overdue account, when realizing on security pledged for a loan, or to detect or prevent fraud.

### **We Protect Your Information From Error, Loss and Unauthorized Access**

Our employees who have access to your information are made aware of how to keep it confidential. Each employee is subject to obligations to protect the confidentiality of confidential information in accordance with company policy, and satisfying such obligations is a condition of employment with Arrow.

### **Our computer security specialists build security into all our computer systems.**

This protects your information at all times, when it is stored in data files or handled by our employees.

## **Your Information Is Destroyed When It Is No Longer Needed**

We keep your information only so long as we need it for the products and services you're using, to offer you products and services when you are a customer and for a reasonable time thereafter, or to meet any legal requirements.

## **You Can See and Verify the Accuracy of Your Information**

You can check your information to verify, update and correct it, and to have any obsolete information removed. We may ask you to put your request in writing.

It may not be appropriate for us to release certain information directly to you.

You can check much of your information routinely – for example, by examining documents that we send to you, such as any statements of account.

If we have obtained information about you from other people, upon your request, we'll let you know the person we got it from.

## **You Can Find Out to Whom We've Given Information About You**

If you ask, we will let you know the names of outside companies or organizations we've given information to. This won't include information given to outside companies we've used to do work for us, such as direct mail marketing companies. It won't include particulars of cheques returned for the reason "Not Sufficient Funds" or otherwise, or regular updates of credit information to Credex.

## **We Respond to Your Request Promptly**

We'll deal quickly with your request to see your information, and always respond to you within 30 days. If we need to extend the time, or we have to refuse your request, we'll tell you why, subject to any legal restrictions and we'll notify you of the new deadline, the reasons for the extension, and your rights under applicable legislation respecting the extension.

## **We Protect Other People's Privacy When We Make Information Available to You**

There may be files that include information about you and other customers, or that have information confidential to Arrow, or are the property of Arrow. Because we must protect everyone's confidentiality and legal rights, we cannot make these files available to persons outside of Arrow. However, we will make available to you any factual information about you contained in such files.

## **We Monitor Our Compliance With this Privacy Policy**

We have procedures in place to assist our employees in the practice of this Privacy Policy. Senior management of the company oversees the practice of these policies on a regular basis.

## **We Are Committed to Upholding this Privacy Policy**

If you have any questions or complaints about our Privacy Policy, or about how we are living up to them, let us know right away. You can contact our Privacy Officer.

## **Resolving Your Concerns Is Important to Us**

Arrow is committed to treating you with the greatest respect and consideration, and providing the highest level of service. Even so, from time to time something may go wrong. There may be a misunderstanding, or you may feel you have been dealt with unjustly. Whatever the circumstances, resolving the problem for you is our primary concern.