



CONNEXON CREATIVE INC. PRIVACY POLICY

COMMITMENT TO PRIVACY

Connexon Creative Inc. ("Connexon"), a member of the STEMCELL Group of Companies ("SGC"), is committed to controlling the collection, use and disclosure of the personal information provided by its clients, employees, website users and affiliates. This policy is compliant with Canadian federal and provincial privacy laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA) (January, 2004).

DEFINITION OF PERSONAL INFORMATION

"Personal Information" means any information, recorded in any form, about any identified individual or any individual whose identity may be inferred or determined from the information, but does not include business contact information.

OBTAINING CONSENT

Connexon will seek consent prior to the collection, use and disclosure of personal information as required by applicable privacy legislation. An individual can refuse to consent to Connexon's collection, use or disclosure of personal information about that individual. Individuals may also withdraw consent to any further collection, use or disclosure of information at any time by providing reasonable notice. If Connexon's intended disclosures or uses of information change, Connexon will notify accordingly.

COLLECTION OF PERSONAL INFORMATION

Personal information is collected by Connexon only when individuals specifically and knowingly provide it to Connexon Creative Inc., such as when individuals choose to receive information, products or services from the STEMCELL Group of Companies. Connexon may also receive personal information from other organizations or third parties provided that such third parties confirm to Connexon that they have obtained consent to the disclosure of personal information. Publicly available information, such as a public directory listing of names, addresses, telephone numbers and electronic addresses, is not considered personal information.

USE OF PERSONAL INFORMATION

Connexon uses personal information to provide individuals with information related to the STEMCELL Group of Companies' products, services, or other information, which is deemed of interest.

DISCLOSURE OF PERSONAL INFORMATION

Connexon and the SGC does not disclose personal information to third parties.

ACCURACY OF PERSONAL INFORMATION

Connexon will make reasonable efforts to ensure personal information is accurate, complete and up-to-date. Individuals are expected to inform Connexon of any change of name, address or other information. In the event that an individual has questions about the accuracy of factual information collected, the individual will have access to verify and update the information. If inaccurate information has been disclosed to a third party, Connexon will contact the third party to correct the information.

SECURITY OF PERSONAL INFORMATION

Security measures, such as locked cabinets, restricted access and the use of passwords and encryption have been adopted to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Connexon staff and contractors have been trained to respect an individual's privacy at all times and those employees with access to personal information shall use personal information strictly in accordance with the Connexon Privacy Policy and the laws applicable to each business.

PRINCIPLES OF FAIR INFORMATION PRACTICES

Connexon adheres to the following principles of fair information practices:

- (a) Connexon is responsible for the personal information under its control and shall designate one or more individuals who shall be accountable for its compliance with the procedures and principles set out in the Connexon Privacy Policy.
- (b) Connexon will identify the purpose for which personal information is collected at or before the time the information is collected. The purposes for which information is collected, used or disclosed by Connexon and the SGC must be those that a reasonable person would consider are appropriate in the circumstances.
- (c) The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where consent is not required by privacy legislation.
- (d) Connexon shall limit the collection of personal information to that which is necessary for the purposes identified. Personal information shall be collected by fair and lawful means.

- (e) 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 by law.
- (f) Personal information shall be retained only as long as necessary for the fulfillment of the purposes for which it was collected.
- (g) Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- (h) Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
- (i) Connexon shall make readily available to individuals, specific information about its policies and practices relating to the management of personal information.

ACCESS TO PERSONAL INFORMATION

For questions about the Connexon Privacy Policy or the collection, use or disclosure of your personal information by the STEMCELL Group of Companies, please contact the Connexon Privacy Officer at:

Privacy Officer

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