

## OSI GEOSPATIAL INC. PRIVACY POLICY

For OSI Geospatial Inc., respecting privacy has always been an important part of our commitment to employees, shareholders, contractually related parties and the general public. The introduction of new privacy legislation in British Columbia has prompted our organization to review our practices and produce the following Privacy Policy. The OSI Privacy Policy is a statement describing the level of protection of personal information provided by OSI to shareholders, contractually related parties and the general public.

### Objective

The objective of the OSI Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the *Personal Information Protection Act* (British Columbia) and any other applicable legislation.

### Definitions

In this Privacy Policy:

**“collection”** means the act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**"contact information"** means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.

**“consent”** means the voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of OSI. Implied consent is consent that can reasonably be inferred from an individual’s action or inaction.

**“disclosure”** means making personal information available to a third party.

**“employee”** means an employee of or independent contractor to OSI .

**"employee personal information"** means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and that individual, but does not include personal information that is not about an individual's employment.

**“OSI ”** means OSI Geospatial Inc.

**“personal information”** means information about an identifiable individual and includes employee personal information (such as age, home address, home email, Social Insurance Number, home phone number, banking information) but does not include contact information or work product information.

**“third party”** means an individual or organization outside of OSI .

**“use”** means the treatment, handling, and management of personal information by and within OSI or by a third party with the knowledge and approval of OSI.

**"work product information"** means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business but does not include personal information about an individual who did not prepare or collect the personal information.

### Section 1 - Accountability

OSI is accountable for the protection of personal information that it has collected. OSI has delegated responsibility for compliance with the provisions of the OSI Privacy Policy to the OSI Privacy Officer. The OSI Privacy Officer can be contacted by e-mail at [privacyofficer@osigeospatial.com](mailto:privacyofficer@osigeospatial.com) or by mail at:

OSI Geospatial Inc.  
Suite 400 – 4585 Canada Way  
Burnaby, B.C.  
V5G 4L6  
Attention: Privacy Officer

In addition to the Privacy Officer, other individuals within OSI may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

In the event that OSI uses third parties to process or store personal information, OSI will use contractual or other means to provide a comparable level of protection while information is being processed or stored by a third party. This will usually mean the provision of a copy of this policy to the third party and the written acknowledgement from the third party that it will be bound by the policy. Further provisions may include the return of all personal information to OSI upon completion, an agreement not to use such information except for the purposes permitted by OSI,

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and the destruction of any remaining records in the possession of the third party.

OSI is committed to ensuring that appropriate security measures are employed in the transfer of sensitive information. However, in relation to e-mail or wireless communication, complete confidentiality and security is not assured. OSI is not accountable for any damages suffered when a shareholder, contractually related party, employee or a member of the public transmits personal information through e-mail or wireless communication or when OSI transmits personal information to a shareholder, contractually related party, employee or a member of the public on request.

### Section 2 - Identifying Purposes for Collection of Personal Information

Unless it is obvious, OSI identifies the purposes for which personal information is collected and specifies electronically or in writing, the identified purposes at or before the time the personal information is collected.

When personal information is collected for purposes not previously identified, the purposes are communicated prior to use. Unless the new purposes are required or authorized by law, consent is obtained before the information is used for the new purpose.

**External Stakeholder Information.** OSI collects personal information about individuals including landowners, leaseholders, residents and royalty holders. The collection of personal information is for legitimate business purposes such as:

- (a) **Administration** – to execute agreements and facilitate payments;
- (b) **Legal Compliance** – as required by law or regulation;
- (c) **Development** – to manage and foster relationships necessary to conduct business;
- (d) **External Stakeholder Considerations** – as otherwise reasonably necessary and/or required.

**Other Information.** OSI may collect personal information about individuals not falling within the above categories, and such collection, use or disclosure will be subject to this Privacy Policy. For example, a shareholder or potential investor may contact OSI and seek information. His or her name and contact information would be retained as necessary to respond to the request.

### Section 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where otherwise provided by law. Generally, OSI will seek consent to use and disclose personal information at the same time it collects the information. However, consent may be implied from an individual's actions. Your knowledge and consent to collection, use and disclosure of your personal information is important. We rely on your actions as indications of your consent to our existing and future personal information practices:

- (a) your voluntary provision of personal information directly to OSI;
- (b) your express consent or acknowledgement contained within a written, verbal or electronic application process;
- (c) your consent solicited by OSI (or our agent) for a specified purpose; or
- (d) your receipt of this Privacy Policy, until you notify OSI of a withdrawal of your consent.

If, after OSI has collected personal information, it wishes to use your personal information for a purpose other than the identified purposes, OSI will seek your consent to use your personal information for the new purpose. In determining the appropriate form of consent, OSI will take into account the sensitivity of the personal information and the reasonable expectations of its shareholders.

Subject to certain legal or contractual restrictions and reasonable notice, you may wish to withdraw consent or discuss the implication of such withdrawal. In such instances, please contact us through one of the means described in Section 1. In some circumstances, legal requirements may prevent you from withholding your consent. Your decision to withhold consent may also limit the information and services that OSI is able to provide you.

### Section 4 - Limiting Collection of Personal Information

OSI will limit the collection of personal information to that which is necessary for the identified purposes. OSI will use methods that are fair and lawful and will not collect information indiscriminately.

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### Section 5 - Limiting Use, Disclosure, and Retention of Personal Information

OSI will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information will be retained only as long as necessary for the fulfilment of those purposes or as required by law.

Only OSI 's employees or directors with a business need to- know, or whose duties reasonably so require, are granted access to personal information.

OSI may on occasion, need to disclose personal information to other parties. OSI ensures that when it transfers shareholder personal information to third parties, it is done with the strict understanding that it is for a specific, legitimate business purpose.

OSI maintains reasonable and systematic controls, schedules and practices for information, records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

### Section 6 - Accuracy of Personal Information

OSI will use reasonable efforts to ensure that personal information used by OSI is sufficiently accurate, complete, and up-to-date. In some cases, OSI relies on persons to ensure that their relevant personal information, such as their addresses or telephone numbers are current, complete and accurate.

OSI will not routinely update personal information unless it is reasonably

You can check your personal information to verify, update and correct it, and to necessary to fulfil the purposes for which it was collected. have any obsolete information removed. OSI may ask you to put your request in writing. If there is any dispute about your request, OSI will note your opinion on the file. There is no charge for verifying or correcting your information, but OSI may charge a reasonable fee for accessing the information.

### Section 7 - Security Safeguards

OSI will protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held. Depending on the sensitivity of the

information, OSI will employ appropriate security measures to protect the information. The measures may include the physical security of offices and storage facilities or electronic security measures such as passwords, encryption and personal identification numbers. This protects your personal information when it is stored in data files or handled by our employees. Our systems also protect your information when OSI is transmitting data between OSI and third party service providers.

OSI will protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of OSI's employees and directors with access to personal information will be required to respect the confidentiality of that information.

OSI will use reasonably appropriate security measures when disposing of personal information.

### Section 8 - Openness Concerning Policies and Procedures

OSI will make readily available to individuals specific information about its policies and procedures relating to the management of personal information, including:

- (a) the title and address of the person or persons accountable for OSI's Privacy Policy;
- (b) the means of gaining access to personal information held by OSI;
- (c) a description of the type of personal information held by OSI , including a general account of its use; and;
- (d) a description of what personal information is made available to related organizations, if any (e.g. subsidiaries).

### Section 9 – Individual Access to Personal Information

Except in limited circumstances prescribed by law, upon written request to the Privacy Officer, you are entitled to access the personal information contained in your record. If you wish to access your personal information, please contact the OSI Privacy Officer at the address provided in Section 1.

OSI will promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness

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will be noted in your file. Where appropriate, OSI will transmit to third parties having access to your personal information any amended information or the existence of any unresolved differences. In order to safeguard personal information, a shareholder may be required to provide sufficient identification information to permit OSI to account for the existence, use and disclosure of personal information and to authorize access to your file. Any such information will be used only for this purpose. Depending on the circumstances, you may be charged a reasonable fee if you want a copy of records which OSI has already given you. OSI will notify you in advance if there is a charge.

### **Section 10 - Challenging Compliance**

If you have any questions or wish to lodge a complaint concerning compliance with the OSI Privacy Policy, please contact the OSI Privacy Officer at the address set out in Section 1. The OSI Privacy Officer will work to assist you in resolving your concern or complaint in a timely manner. OSI will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, OSI will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. You will be informed of the outcome of the investigation regarding your complaint.

The person or persons accountable for compliance with the OSI Privacy Policy may seek external advice where appropriate before providing a final response to your complaints.

Should you not be able to accept OSI's conclusion, or should you require assistance at any time in the process, you may also write to the provincial Privacy Commissioner of British Columbia. OSI will provide you with this contact information upon request.

### **Changes**

OSI may, from time to time, make changes to this Privacy Policy to adapt to changing business conditions or other reasons. In the event that in the opinion of OSI, acting reasonably, such changes will allow OSI to make materially greater use of or disclosure of any personal information, the individuals affected by the changes will be notified of the changes and their proposed effect, and provided with an opportunity to withdraw their consent to the collection, use and/or disclosure of their personal information.

### **Breach of Company Privacy Policy**

An employee who is found to be in breach of this policy will be subject to discipline up to and including discharge for cause.