

Feedlot Health Management Services Privacy Policy Regarding the Collection, Use and Disclosure of Personal Information

1. OBJECTIVE AND SCOPE OF POLICY

Feedlot Health Management Services (FHMS) is committed to respecting your privacy and has prepared this Policy Statement to inform you of our policy and practices concerning the collection, use, and disclosure of Personal Information.

This Policy Statement governs Personal Information collected from and about our clients and external associates. It does not govern Personal Information FHMS collects from and about our employees, the protection of which is governed by the Employee Privacy Policy.

Using contractual or other arrangements, FHMS will ensure that agents, contractors, or third party service providers, who may receive Personal Information in the course of providing services to FHMS as part of our delivery of products and services, will protect that Personal Information in a manner consistent with the principles articulated in this Policy Statement.

In the event of questions about: (i) access to your Personal Information; (ii) FHMS' collection, use, management, or disclosure of Personal Information; or (iii) this Policy Statement; please contact:

Dawn Bennion
c/o DMT Corporation

E-mail: dbennion@dmtdcorporation.ca
Telephone number: 403-995-7700
Fax number: 403-995-7703

2. THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

For the purpose of this Policy:

“Client” means an individual who has purchased FHMS products or services or a person who has contacted us for that purpose, whether or not such products and services were purchased.

“External Associate” means an individual, other than a Client, who is not an employee of FHMS. An External Associate may be an individual or an employee of an organization with which FHMS has dealings in the normal course of business. Examples of External Associates include independent contractors or service providers, legal counsel, and consultants.

“Personal Information” means any information, recorded in any form, about an identifiable individual, or an individual whose identity may be inferred or determined from such information.

Your provision of Personal Information to FHMS means that you agree and consent to the collection, use, and disclosure of your Personal Information in accordance with this Privacy Policy. If you do not agree with these terms, you are requested not to provide any Personal

Information to FHMS. There are certain services that can only be offered if you provide Personal Information to FHMS. Consequently, if you choose not to provide us with any required Personal Information, FHMS may not be able to offer you those services.

FHMS uses the Personal Information provided orally or in writing (including via electronic media such as e-mail or the World Wide Web) by Clients and External Associates in order to:

- Provide information about products and services to FHMS clients;
- Maintain our relationship with FHMS clients;
- Ensure the quality of FHMS products and services;
- Meet applicable legal or regulatory requirements.

FHMS does not sell, trade, barter, or exchange for consideration any Personal Information it has obtained.

FHMS may disclose Personal Information of Clients to organizations that perform services on behalf of FHMS. Such disclosure will be made only if the organization has agreed to use such information solely for the purposes of providing services to FHMS under the instruction of FHMS and has further agreed to use such information in compliance with this Policy Statement.

In some cases, FHMS may disclose Personal Information *without* consent. Such circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency, or other governmental tribunal;
- Where FHMS believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of other individuals;
- Where it is necessary to establish entitlement to or collect monies owing to FHMS;
- Where it is necessary to permit FHMS to pursue available remedies or limit any damages that FHMS may sustain; or
- Where the information is generally known to the public.

Where obliged or permitted to disclose information without consent, FHMS will not disclose more information than is required.

3. ACCURACY

FHMS endeavours to ensure that any Personal Information provided by its Clients and in its possession is accurate, current and complete. Information contained in files that have been closed is not actively updated or maintained. Personal Information is kept in FHMS records for four years for accounting and tax purposes.

4. RETENTION

FHMS retains Personal Information as long as is necessary to fulfil the purpose of which it was collected.

5. SECURITY

FHMS endeavours to maintain adequate physical, procedural, and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information.

FHMS further protects Personal Information by restricting access to this information to those FHMS employees and External Associates who require access in order to provide its products or services.

6. VISITING FHMS WEBSITES

FHMS collects information from its website visitors through the use of "cookies". "Cookies" are files or pieces of information that may be stored in your computer's hard drive when you visit any of our websites. Cookies are also used to remember that you may have already provided Personal Information to us and as a result, they help speed up your future activities when accessing our website. The cookies are persistent cookies and reside on your Internet browser for six (6) months. FHMS does not share Personal Information obtained through cookies with any third parties.

Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set yours to refuse cookies or to alert you when cookies are being sent.

In some instances you may have received a unique Client ID and created a password in order to use the secure portions of a FHMS website. You are requested not to divulge your Client ID or password to anyone other than FHMS personnel (e.g. Customer Service assistance) and then only for the purpose of permitting them to provide service to you.

In addition to Personal Information you provide and cookies, FHMS may collect other information about your visits to our websites. For example, we may collect information about your computer, such as your IP address (a number assigned to your computer whenever you surf the World Wide Web); the type of Internet browser you are using; the type of computer operating system you are using; or the domain name of the website for which you linked to our websites. This information will not be linked to your Personal Information and will only be collected in the aggregate in connection with all the users of our Websites for planning, forecasting, and/or evaluation purposes.

FHMS has no control over the content of third party web sites that may be identified on the FHMS website or, if applicable, accessed through hyperlinks.

7. ACCESS TO PERSONAL INFORMATION

FHMS permits individuals to have access to their own Personal Information held by FHMS upon written request. Requests should be directed to FHMS' Privacy Officer. FHMS reserves the right to decline access to Personal Information that:

- (a) Would disclose the Personal Information of another individual or of a deceased individual;

- (b) Would disclose business or confidential information that may harm FHMS or the competitive position of a third party;
- (c) Is subject to solicitor-client or litigation privilege;
- (d) Could reasonably result in: (i) serious harm to the treatment or recovery of the individual concerned; (ii) serious emotional harm to the individual or another individual; or (iii) serious bodily harm to another individual;
- (e) May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by statute to perform such functions;
- (f) Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information; or
- (g) Does not exist, or is not held by FHMS.

Where information will not or cannot be disclosed, FHMS will provide written reasons for the non-disclosure.

Where information will be disclosed, FHMS will endeavour to provide the information in question within a reasonable time and no later than 30 days following the request, unless an extension is obtained in accordance with applicable privacy legislation.

FHMS will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, it will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information.

To guard against fraudulent requests for access, FHMS will require sufficient information to allow it to confirm the identity of the person making the request before granting access or making corrections.

If you believe any Personal Information concerning you is not correct, you may request an update of that information by sending a request to FHMS' Privacy Officer. FHMS reserves the right not to change any Personal Information but will append any alternative text you believe is appropriate. You may also request that FHMS delete any of your Personal Information from FHMS' system and records. However, due to technical constraints and the fact that FHMS backs up its systems, Personal Information may continue to reside in FHMS' system after deletion. Individuals therefore should not expect that their Personal Information will be completely removed from FHMS systems in response to an accepted request for deletion.

8. AMENDMENT TO FHMS PRACTICES AND THIS PRIVACY POLICY

This statement is in effect as of April 1, 2004. From time to time, FHMS will review and revise its privacy practices and this Policy Statement. In the event of any amendment, an updated Policy statement will be posted on the FHMS company website. Policy changes will apply to the information collected from the date of posting of the revised Policy Statement to FHMS' website as well as to existing information held by FHMS.

9. WHAT YOU CONSENT AND AGREE TO

In summary, when you provide FHMS with Personal Information, you consent and agree to the following:

- *The collection, use and disclosure of Personal Information from or about you as described in Section 2, and to your right to access and correct data as described in Section 7.*
- *Your acceptance of the risks concerning the transmission of information to FHMS as described Section 5.*
- *The amendment of this Policy Statement as described in Section 8.*

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