

Pinnacle Investigations and Security Services Ltd.

Privacy Code

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Introduction

At Pinnacle Investigations and Security Services Ltd., respecting privacy is an important part of our commitment to our clients and employees. That is why we have developed this privacy code. The Pinnacle Investigations and Security Services Ltd. Privacy Code is a statement of principles and guidelines regarding the minimum requirements for the protection of personal information provided by Pinnacle Investigations and Security Services Ltd. to our clients and employees. The objective of the Privacy Code is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of *the Personal Information Protection Act (BC) and/or where applicable the Personal Information Protection and Electronic Documents Act (Canada)*.

Pinnacle Investigations and Security Services Ltd. has adopted the Canadian Standards Association Model Code for the Protection of Personal Information. We embrace each of the ten principles of this code and will continue to review this Privacy Code to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

NOTE:

Pinnacle Investigation and Security Services Ltd. is a proud member of The Private Investigators Association of British Columbia and has been granted "Investigative Body" Status under the *Personal Information Protection and Electronic Documents Act (Canada)*.

Summary of Principles

Principle 1 – Accountability

Each Pinnacle Investigation and Security Services Ltd. employee is responsible for all personal information in his/her/its control. Pinnacle Investigation and Security Services Ltd. will assist all employees to ensure full compliance with the company's Privacy Policy.

Pinnacle Investigations and Security Services Ltd. accept responsibility for personal information under its control and have designated Corporation President James C. Thomasen, as the privacy officer, who is accountable for Pinnacle Investigation and Security Services Limited compliance with the following principles.

Principle 2 - Identifying Purposes for Collection of Personal Information

The purposes for which personal information is collected shall, where possible, be identified by Pinnacle Investigation and Security Services Ltd. before the information is collected, or when the foregoing is not possible, then at the time of collection.

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

Pinnacle Investigation and Security Services Ltd. acknowledges that knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

Principle 4 - Limiting Collection of Personal Information

The collection of personal information will be limited to that which is necessary for the purposes identified by Pinnacle Investigations and Security Services Ltd. All personal information will be collected by fair and lawful means.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Personal information collected by Pinnacle Investigations and Security Services Ltd. will 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.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

Principle 7 - Security Safeguards

Pinnacle Investigations and Security Services Ltd. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

Principle 8 - Openness Concerning Policies and Procedures

Pinnacle Investigations and Security Services Ltd. shall make readily available to individuals and employees specific information about its policies and procedures relating to the management of personal information.

Principle 9 – Individual and Employee Access to Personal Information

Pinnacle Investigations and Security Services Ltd. shall inform an individual or employee of the existence, use, and disclosure of his or her personal information upon request and shall give the individual access to that information. An individual or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 - Challenging Compliance

An individual or employee shall be able to address a challenge concerning compliance with the above principles to the designated person accountable for Pinnacle Investigations and Security Services Ltd.'s compliance with The Pinnacle Investigations and Security Services Ltd. Privacy Code.

Scope and Application

The ten principles that form the basis of The Pinnacle Investigations and Security Services Ltd. Privacy Code are interrelated and Pinnacle Investigations and Security Services Ltd. shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by *the Personal Information Protection Act (BC) and/or where applicable the Personal Information Protection and Electronic Documents Act (Canada)*, the commentary in The Pinnacle Investigations and Security Services Ltd. Privacy Code has been drafted to reflect personal information issues specific to Pinnacle Investigations and Security Services Ltd.

The scope and application of the Pinnacle Investigations and Security Services Ltd. Privacy Code are as follows:

- The Pinnacle Investigations and Security Services Ltd. Privacy Code apply to personal information collected, used, or disclosed by Pinnacle Investigations and Security Services Ltd. in the course of commercial activities.
- The Pinnacle Investigations and Security Services Ltd. Privacy Code apply to the management of personal information in any form, whether oral, electronic or written.
- The Pinnacle Investigations and Security Services Ltd. Privacy Code does not impose any limits on the collection, use or disclosure of the following information by Pinnacle Investigations and Security Services Ltd.:
 - (a) An employee's name, title or business address or telephone number;
 - (b) Information that Pinnacle Investigation and Security Services Ltd. collects, uses or discloses for journalistic, artistic or literary purposes and does not collect, use or disclose for any other purpose; or
 - (c) Other information about the individual that is publicly available and is specified by regulation pursuant to the *Personal Information Protection Act (BC) and/or where applicable Personal Information Protection and Electronic Documents Act (Canada)*, the regulations enacted there under, and any other applicable legislation or regulation.

Definitions

collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

consent: 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 Pinnacle Investigations and Security Services Ltd. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

client: An individual who purchases or otherwise acquires or uses any of Pinnacle Investigations and Security Services Ltd's. products or services or otherwise provides personal information to Pinnacle Investigations and Security Services Ltd. in the course of Pinnacle Investigations and Security Services Ltd's. commercial activities.

disclosure: Making personal information available to a third party.

individual: An identifiable person

employee: An employee of or independent contractor to Pinnacle Investigations and Security Services Ltd.

personal information: Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

name of organization: Pinnacle Investigations and Security Services Ltd.

third party: An individual or organization outside of Pinnacle Investigations and Security Services Ltd.

use : The treatment, handling, and management of personal information by and within Pinnacle Investigations and Security Services Ltd. or by a third party with the knowledge and approval of Pinnacle Investigations and Security Services Ltd.

The Pinnacle Investigations and Security Services Ltd. Privacy Code in Detail

1. Accountability

Pinnacle Investigations and Security Services Ltd. accepts responsibility for personal information under its control. Corporation President James C. Thomasen is the privacy officer who is accountable for Pinnacle Investigations and Security Services Ltd.'s compliance with the following principles.

Each Pinnacle Investigation and Security Services Ltd. employee is responsible for all personal information in his/her/its control. Pinnacle Investigation and Security Services Ltd. will assist all employees to ensure full compliance with the company's Privacy Policy.

- 1.1 Responsibility for compliance with the provisions of the Pinnacle Investigation and Security Services Ltd. Privacy Code rests with the Pinnacle Investigation and Security Services Ltd. Privacy Officer who can be reached at 604-468-6358 or via email to info@pinnacle-investigationa.com marked: attention - Privacy Officer.
- 1.2 Pinnacle Investigation and Security Services Ltd. is responsible for personal information in its possession or control. Pinnacle Investigation and Security Services Ltd. shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.
- 1.3 Pinnacle Investigation and Security Services Ltd. shall implement policies and procedures to give effect to Pinnacle Investigation and Security Services Ltd. Privacy Code, including:
 - (a) Implementing procedures to protect personal information and to oversee Pinnacle Investigation and Security Services Ltd.'s compliance with Pinnacle Investigation and Security Services Ltd.'s Privacy Code;
 - (b) Implementing procedures to receive and respond to complaints or inquiries;
 - (c) Training and communicating to staff about Pinnacle Investigation and Security Services Ltd. policies and procedures; and

- (d) Developing information materials to explain Pinnacle Investigation and Security Services Ltd.'s policies and procedures.

2. Identifying Purposes

The purposes for which personal information is collected shall, where possible, be identified by Pinnacle Investigation and Security Services Ltd. before the information is collected; when the foregoing is not possible, then at the time of collection.

The purposes for which Pinnacle Investigation and Security Services Ltd. will collect personal information are:

- 2.1 To facilitate the investigation of contravention or suspected contravention of the law;
- 3.3 To facilitate the investigation of breaches or suspected breaches of agreements.
- 2.3 For the purposes of establishing, managing or terminating an employment relationship between Pinnacle Investigation and Security Services Ltd. and individual employees.

Personal information collected to facilitate 2.1 may include information pertaining to individuals involved in criminal activity, individuals suspected of involvement in criminal activity, individuals with knowledge of criminal activity, and individuals who may advance an investigation by providing information relating to the identity of those involved in, or suspected of criminal activity.

Personal information collected to facilitate 2.2 may include information pertaining to individuals who are party to an agreement, individuals who have knowledge of the terms and conditions of an agreement, individuals who have knowledge of the breach of an agreement, or individuals who may advance an investigation by providing information relating to a breach of an agreement.

Personal information collected to facilitate 2.3 may include employment related purposes for payment, tax related, and other purposes relating to personnel management.

3. Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual or employee are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual.

- 3.1 In obtaining consent, Pinnacle Investigation and Security Services Ltd. shall use reasonable efforts to ensure that an individual or employee is advised of the

identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the individual or employee.

- 3.2 Generally, Pinnacle Investigation and Security Services Ltd. shall seek consent to use and disclose personal information at the same time it collects the information. However, In many instances, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation. Personal information will only be collected, used and disclosed by Pinnacle Investigation and Security Services Ltd. without consent in accordance with section 7 of the Personal Information Protection and Electronics Documents Act, S. C. 2000, c 5 (PIPEDA) and Section 12 of the Personal Information Protection Act (PIPA).

In certain cases Pinnacle Investigation and Security Services Ltd. may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

- 3.3 Pinnacle Investigation and Security Services Ltd. may require clients to consent to the collection, use and/or disclosure of personal information as a condition of providing a service only if such collection, use and/or disclosure is required to fulfill the explicitly specified, and legitimate identified purposes.
- 3.4 In determining the appropriate form of consent, Pinnacle Investigation and Security Services Ltd. shall take into account the sensitivity of the personal information and the reasonable expectations of its clients and employees.
- 3.5 The purchase or use services by a client, or the acceptance of employment by an employee, may constitute implied consent for Pinnacle Investigation and Security Services Ltd. to collect, use and disclose personal information for the identified purposes.
- 3.6 A client or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. clients and employees may contact Pinnacle Investigation and Security Services Ltd. for more information regarding the implications of withdrawing consent.
- 3.7 Pinnacle Investigation and Security Services Ltd. may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.
- 3.8 Pinnacle Investigation and Security Services Ltd. may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a

contravention of a law or where it is reasonable to expect the consent may compromise the investigation.

3.9 Pinnacle Investigation and Security Services Ltd. may collect, use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

3.10 Pinnacle Investigation and Security Services Ltd. may use or disclose personal information without knowledge or consent to a lawyer representing Pinnacle Investigation and Security Services Ltd., to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

4. Limiting Collection of Personal Information

Pinnacle Investigation and Security Services Ltd. shall limit the collection of personal information to that which is necessary for the purposes identified by Pinnacle Investigation and Security Services Ltd. Pinnacle Investigation and Security Services Ltd. shall collect personal information by fair and lawful means.

4.1 Pinnacle Investigation and Security Services Ltd. collects personal information from its clients and employees. Personal information may also be collected by lawful means during investigations.

4.2 Pinnacle Investigation and Security Services Ltd. may also collect personal information from other sources including credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

5. Limiting Use, Disclosure, and Retention of Personal Information

Pinnacle Investigation and Security Services Ltd. shall 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. Pinnacle Investigation and Security Services Ltd. shall retain personal information only as long as necessary for the fulfillment of those purposes.

5.1 Pinnacle Investigation and Security Services Ltd. may disclose a client's personal information to:

- It's employees/sub-contractors for purposes of providing services to the client
- Other parties when consent for release of the information is authorized by the client
- Other authorities as required by law

- 5.2 Pinnacle Investigation and Security Services Ltd. may disclose personal information about its employees to:
- Tax authorities as required by provisions of the Income Tax Act
 - WCB authorities as required by law
 - Any other authority as required by law or statute
- 5.3 Only Pinnacle Investigation and Security Services Ltd. employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about clients and employees.
- 5.4 Pinnacle Investigation and Security Services Ltd. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a client or employee, Pinnacle Investigation and Security Services Ltd. shall retain, for a period of time that is reasonably sufficient to allow for access by the client or employee, either the actual information or the rationale for making the decision.
- 5.5 Pinnacle Investigation and Security Services Ltd. shall maintain reasonable and systematic controls, schedules and practices for information and 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 shall be destroyed, erased or made anonymous.

6. Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

- 6.1 Personal information used by Pinnacle Investigation and Security Services Ltd. shall be sufficiently accurate, complete, and up -to-date to minimize the possibility that inappropriate information may be used to make a decision about a client, employee or a subject of an investigation.
- 6.2 Pinnacle Investigation and Security Services Ltd. shall update personal information about clients and employees as necessary to fulfill the identified purposes or upon notification by the individual.

7. Security Safeguards

Pinnacle Investigation and Security Services Ltd. shall protect personal information by security safeguards appropriate to the sensitivity of the information.

- 7.1 Pinnacle Investigation and Security Services Ltd. shall 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.

- 7.2 Pinnacle Investigation and Security Services Ltd. shall 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.
- 7.3 All of Pinnacle Investigation and Security Services Ltd. employees with access to personal information shall be required to respect the confidentiality of that information.

8. Openness Concerning Policies and Procedures

Pinnacle Investigation and Security Services Ltd. shall make readily available to clients and employee specific information about its policies and procedures relating to the management of personal information.

- 8.1 Pinnacle Investigation and Security Services Ltd. shall make information about its policies and procedures easy to understand, including:
- (a) the title and address of the person or persons accountable for Pinnacle Investigation and Security Services Ltd. compliance with Pinnacle Investigation and Security Services Ltd. Privacy Code and to whom inquiries and/or complaints can be forwarded;
 - (b) the means of gaining access to personal information held by Pinnacle Investigation and Security Services Ltd.;
 - (c) a description of the type of personal information held by Pinnacle Investigation and Security Services Ltd., including a general account of its use; and
 - (d) a description of what personal information is made available to related organizations (e.g., subsidiaries).
- 8.2 Pinnacle Investigation and Security Services Ltd. shall make available information to help employees exercise control of the collection, use and/or disclosure of personal information and, where applicable, privacy-enhancing services available.

9. Individual Access to Personal Information

Upon request, Pinnacle Investigation and Security Services Ltd. shall inform a client or employee of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. A client or employee shall be able to

challenge the accuracy and completeness of the information and have it amended as appropriate.

- 9.1 Upon request, Pinnacle Investigation and Security Services Ltd. shall afford clients and employees a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.
- 9.2 In certain situations, Pinnacle Investigation and Security Services Ltd. may not be able to provide access to all the personal information that it holds about a client or employee. For example, Pinnacle Investigation and Security Services Ltd. may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Pinnacle Investigation and Security Services Ltd. may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to an investigation and it is reasonable to expect the access would compromise an investigation or in relation to an investigation of a breach of an agreement or a contravention of the laws of Canada or a province.
- 9.3 Upon request, Pinnacle Investigation and Security Services Ltd. shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. In providing an account of disclosure, Pinnacle Investigation and Security Services Ltd. shall provide a list of third parties to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.
- 9.4 In order to safeguard personal information, a client or employee may be required to provide sufficient identification information to permit Pinnacle Investigation and Security Services Ltd. to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.
- 9.5 Pinnacle Investigation and Security Services Ltd. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Pinnacle Investigation and Security Services Ltd. shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.
- 9.6 Clients and employees can obtain information or seek access to their individual files by contacting Pinnacle Investigation and Security Services Ltd. Privacy Officer.

10. Challenging Compliance

A client or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Pinnacle Investigation and Security Services Ltd. compliance with Pinnacle Investigation and Security Services Ltd. Privacy Code.

- 10.1 Pinnacle Investigation and Security Services Ltd. shall maintain procedures for addressing and responding to all inquiries or complaints from its clients and employees regarding Pinnacle Investigation and Security Services Ltd. handling of personal information.
- 10.2 Pinnacle Investigation and Security Services Ltd. shall inform its clients and employees about the existence of these procedures as well as the availability of complaint procedures.
- 10.3 The person or persons accountable for compliance with Pinnacle Investigation and Security Services Ltd. Privacy Code may seek external advice where appropriate before providing a final response to individual complaints.
- 10.4 Pinnacle Investigation and Security Services Ltd. shall investigate all complaints concerning compliance with Pinnacle Investigation and Security Services Ltd. Privacy Code. If a complaint is found to be justified, Pinnacle Investigation and Security Services Ltd. shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A client or employee shall be informed of the outcome of the investigation regarding his or her complaint.

Additional Information

For more information regarding The Pinnacle Investigation and Security Services Ltd. Privacy Code, please contact The Pinnacle Investigation and Security Services Ltd. Privacy Officer at 604-468-6358 or via email to info@pinnacle-investigationa.com marked: attention - Privacy Officer.