

NEWAD PRIVACY POLICY

1. Purpose of this Privacy Policy

1.1. The purpose of this Privacy Policy (this “**Policy**”), is to inform you of NEWAD and its affiliates’ commitments to the protection of personal information and the rules which guide us when we collect, hold, use or disclose personal information. It is designed to meet or exceed the requirements of Canadian federal and provincial protection of personal information legislation.

2. Why we may collect information

2.1. NEWAD is a media company specialized in targeting, for advertising purposes, young adults. We are conducting researches to understand this target group, to share this knowledge with our clients and partners and we are also providing consumers with experiential marketing from our advertisers. We collect information in view of:

- a) Establishing and maintaining commercial relationships with you;
- b) Research purposes;
- c) To develop, enhance market and provide products and services;
- d) Advertise directly or through our clients and partners, services, products, premiums, goods and services, provided we have obtained your prior Consent to this effect.

3. Our Privacy Policy

3.1. NEWAD is responsible for personal information it holds or which is under its control, including personal information it entrusts to agents, service providers or partners. NEWAD has appointed a Privacy Officer to ensure compliance, by itself and its affiliates and by its agents, service providers or partners with Canadian legislation, to receive and respond to questions and complaints, to deal with requests for access and rectification of files and to make sure that your name and other personal information will be removed from NEWAD’s databases upon your request.

Unless otherwise specifically stated in this Policy, all communications addressed to our Privacy Officer should be in writing and sent to the following address:

NEWAD Media Inc. / Privacy Officer
4200 St-Laurent
Suite 1440
Montreal, Quebec
H2W 2R2

4. NEWAD's commitments towards your privacy

- 4.1. We collect information solely from the individual concerned except when we are authorized by law or by the individual concerned to collect it from third parties;
- 4.2. We only collect personal information as is necessary to carry on our activities;
- 4.3. We inform the individual concerned, at the time of collection of the personal information, of the purposes for which such information is collected;
- 4.4. We do not transfer or disclose any personal information to third parties (other than our affiliates, agents or service providers) without the consent of the individual concerned, except when required by law;
- 4.5. We may share personal information with a partner or client only when the individual concerned is clearly informed at the time the information is collected and when consent of the individual is previously obtained;
- 4.6. We require our agents or service providers that provide us with administrative, information processing, data management or other services and that are required to collect, hold use or process personal information to comply with this Policy;
- 4.7. We safeguard, according to strict standards of security and confidentiality, the personal information we hold or which is under our control;
- 4.8. We allow only authorized employees who are trained in appropriate handling of personal information and for whom such information is necessary to perform their duties to have access to personal information;
- 4.9. The individual is entitled to have the personal information we hold on him or her rectify, remove or complete.

5. NEWAD's rules for the protection of personal information

5.1. Collection of personal information

The nature of personal information that NEWAD and its affiliates collect on individuals may include:

- 5.1.1. information we receive from you on a voluntary basis, verbally, in writing or electronically when, directly or through our agents or service providers, alone or jointly with our partners, we are a) conducting a survey or research, or b) organizing a contest or any other marketing activity. This information usually includes your name, address, e-mail address, phone number, gender, age, language preference, any other information pertaining or relevant to said survey, research, contests or activity, such as your behaviour and preferences as a consumer generally;
- 5.1.2. information we receive from you on a voluntary basis verbally, in writing or electronically when, directly or through our agents or service providers, you are registering to be part of our databases or to receive our newsletters. This information usually includes your name, address, email address, gender, age language preference and your behaviour and preferences as a consumer generally;
- 5.1.3. When personal information is being collected on behalf of NEWAD or NEWAD and its affiliates partners and clients, by an agent or service provider, NEWAD and its affiliates will require such agent or service provider to abide by our Privacy Policy that includes the following obligations, namely:
 - a) to collect personal information solely from the individual concerned or his/her authorized representative, except when we are authorized by the person concerned to collect from a third party;
 - b) upon request, to inform the individual concerned that the collection of personal information is carried out on behalf of NEWAD or on behalf of NEWAD and its affiliates, partners and clients as the case may be, except when the circumstances in which the collection of personal information reasonably justify not informing the identity of the entity of the entity for which the collection of personal information is carried out.
 - c) to warrant that it will comply with this Policy and applicable Canadian federal and provincial laws relating to the protection of personal information.

5.2. Purposes for collecting personal information

NEWAD and its affiliates, whether acting directly or indirectly or through their agents or service providers or jointly with their partners, may collect personal information for the following purposes:

- 5.2.1. to conduct surveys or research activities on the preferences interests and needs of the individuals in order to have a better understanding of them;
 - 5.2.2. to inform the individuals about NEWAD, its affiliates, its partners and clients and their products, publications, contests and events;
 - 5.2.3. to contact the individuals and send them invitations or mailings regarding NEWAD, its affiliates, its partners and clients and information about their products, publications, contests and events.
- 5.3. NEWAD and its affiliates, whether acting directly or through their agents or service providers or jointly with their partners, will only collect personal information directly from the individual concerned or his/her authorized representative.
- 5.4. Information regarding uses and authorizations
- 5.4.1. When collecting personal information we will inform you of the purpose for which it is collected;
 - 5.4.2. When collecting personal information we will inform you of the mandatory or voluntary nature of the information to participate in a contest, activity or event;
 - 5.4.3. When collecting personal information, we will obtain your consent as to the purposes for which it is collected;
 - 5.4.4. We may include our partners' and client, products or advertisings provided we had your prior consent to do so;
 - 5.4.5. You will always have the right to have your name and other personal information deleted from our databases or marketing lists except when we are required by law to retain such information;
 - 5.4.6. You will always have the right to withdraw your consent as to the collection, use, holding and disclosure of personal information, except when we are required or authorized by law to collect, use, retain or disclose such information;

- 5.4.7. If you inform us in writing of your desire to have your personal information removed from our databases, we will comply within 30 days from the date of receipt of the request.

6. Disclosure of personal information

- 6.1. NEWAD and its affiliates will neither disclose, transfer nor share personal information with third parties without obtaining your express (verbally, in writing or electronically) and positive prior consent, except in the following situations:

- 6.1.1. When we are required or authorized by law;
- 6.1.2. When we are asking our agents or service providers to perform a service for us; for example to organize or execute on our behalf a task, a marketing project, activity or offer, a survey, a research or a mailing project;
- 6.1.3. When we are securing administrative services or support from agents or service providers, such as data processing, mailing or updating of information;
- 6.1.4. When we are requesting outside professional such as lawyers, auditors and computer specialists to provide us with advice or services;
- 6.1.5. When we have collected personal information jointly with an identified partner and offered you the possibility to refuse that such information be shared with our partner.

- 6.2. Before receiving any personal information from us, our agents or service providers will be required to agree to the following obligations:

- 6.2.1. To provide for the protection of personal information against errors, loss, unauthorized access and unauthorized use;
- 6.2.2. To ensure that personal information is kept as long as it is needed to fulfill the purposes for which it was collected;
- 6.2.3. To ensure that personal information is not communicated to third parties, except when required or authorized by law or by the individual concerned;
- 6.2.4. To stop using any and all personal information regarding an individual who has indicated to us that he/she does not wish that such information be used;

- 6.2.5. To return such information to us or destroy it, without keeping a copy thereof, when the mandate has been fulfilled or the service or advice has been provided;
- 6.2.6. To warrant that they have put in a place a compliance procedure and policy to ensure compliance with the obligations set forth in the applicable federal and provincial legislation dealing with the protection of personal information and in this Policy;
- 6.2.7. To warrant that they will keep us informed of any violation of the privacy obligations mentioned in the agreement as well as of any complaint or governmental investigation that may occur regarding the personal information obtained from us or collected, used and held by them for us;
- 6.2.8. To allow us or our duly authorized agents reasonable access to their premises as necessary to conduct an audit to ensure their compliance with the applicable Canadian federal and provincial laws concerning the protection of personal information and in this Policy.

7. Security of personal information

- 7.1. We will act diligently in protecting the personal information that we hold against loss, theft, unauthorized consultation, disclosure, copying, use or alteration by using physical technological and administrative security measures on-line and off-line.

8. Consent

- 8.1. The Consent to the collection, use or disclosure of sensitive information shall generally be express and positive;
- 8.2. Express and positive consent as well as opt in may be oral, in writing or electronic;
- 8.3. Consent may be given by an authorized representative of the individual concerned;
- 8.4. Express and positive consent may be given electronically in checking a box authorizing NEWAD and its affiliates to further disclose and transfer to third-parties personal information;

- 8.5. The individual concerned may withdraw his/her consent at any time as long as he/she establishes his/her identity and gives us reasonable notice of withdrawal;
- 8.6. Withdrawal or refusal of consent may result in restrictions. For example, in some cases, refusal of consent could result in a person not obtaining the goods or services offered or not being able to participate in an activity, a survey, a research or a contest if the consent is essential therefore;

9. Accuracy of personal information

- 9.1. We will take steps to ensure that the personal information we hold is up to date and complete for the purposes for which it is intended and we will update the personal information we hold based on the information communicated by the individual concerned.

10. Openness and Access

- 10.1. If you have submitted personal information and would like us to remove it from our records, or if you no longer wish to receive communication from us and would like to unsubscribe, or if you have registered to one of our online privileged member websites and would like to deactivate your account, you can send a request and all other comments or enquiries by writing to Privacy Officer, Legal Affairs, NEWAD Media Inc., 4200, St-Laurent, Suite 1440, Montreal, Quebec, H3A 3S7. In order to answer your request, you will need to indicate the name of the division as well as your full personal information. We will respond within a reasonable time.