

ROBERT GORE & ASSOCIATES
PRIVACY POLICY - Effective January 1, 2004

At Robert Gore & Associates (“RG&A”), we are committed to protecting the privacy and confidentiality of the personal information of our clients (individually, the “Client” and collectively, the “Clients”).

We have a professional obligation to maintain in confidence information we receive within a client relationship. The purpose of this Privacy Policy is to advise you as to why we ask for personal information, how we use it, what safeguards we employ, and how to contact us with privacy-related questions.

What Is Personal Information?

In this Privacy Policy, “Personal Information” means information that specifically identifies a Client as an individual and is provided to, or collected by, RG&A and its staff. Personal Information however, does not include your name, business title or business contact information in your capacity as an employee.

Why RG&A Collects Personal Information

RG&A collects and uses Personal Information for the following purposes:

- Providing professional services and products to the Client;
- Advising Clients of the professional services provided by RG&A, as well as, ongoing developments in accounting and taxation.
- Administration, billing, accounting and collection issues related to a Client’s account with RG&A;
- Compliance with all municipal, provincial, federal and other applicable laws; and
- Such other specific purposes which are communicated to the Client by an employee or partner of RG&A before collection of such Personal Information.

Except when otherwise permitted by law, we will only use a Client’s Personal Information for the purposes identified to the Client. When Personal Information is to be used for a purpose not identified, we will take all reasonable steps to ensure that new purpose is identified prior to use.

How Do We Collect Personal Information?

Wherever possible we collect your personal information directly from you, at the start of a retainer and in the course of our engagement or service. Sometime we may obtain information about you from other sources, for example, from:

- a Client’s insurance company;
- a Client’s real estate agent in a property transaction;
- from a government agency or registry;
- A Client’s employer, at the Client’s request; and
- A Client’s banker, financial advisor or other professional.

Consent

Your provision of Personal Information to RG&A means that you agree and consent that RG&A

can collect, use and disclose your Personal Information in compliance with this Privacy Policy. RG&A will not collect, use or disclose a Client's Personal Information without the Client's requisite consent, except in certain extraordinary circumstances. Such extraordinary circumstances shall include without limitation, when legal, medical or security reasons make it impossible or impractical to obtain consent or where it is otherwise in the best interests of the Client.

The most common method we use to obtain a Client's consent is by way of the Client's oral consent as confirmed by a retainer letter or, where applicable, by Client intake questionnaire. Where practicable, we may also obtain a Client's consent through oral communications. You may also consent by implied means such as when you have previously provided Personal Information to us and continue to use our services on other matters or where you provide us with your personal telephone number so that we can contact you at home or place of work.

Our Clients may withdraw their consent by written notice to us at any time, subject to any legal or contractual restrictions and reasonable notice. A Client's refusal to provide, or subsequent withdrawal of, his or her consent may affect RG&A's ability to provide the Client with professional services. A member of RG&A will inform the Client of the implications of such withdrawal. To withdraw consent, a Client should contact the Chief Privacy Officer in writing at:

Robert Gore & Associates
1238 Kingston Road
Toronto, Ontario, M1N 1P3

Attn: Privacy Officer
Email: PrivacyOfficer@goreca.com

Use and Disclosure of Personal Information

We will use a Client's Personal Information to provide professional advice and services to the Client, to administer our database, to include Clients in direct marketing activities and for the other uses described above under the heading "Why RG&A Collects Personal Information". Under certain circumstances, RG&A will disclose a Client's personal information to third parties. Specifically, Personal Information may be used, shared and disclosed to, from, or with, experts retained on a Client's behalf, as well as such other third parties as are necessary to facilitate the engagement for which the Client has retained our office and provided its consent.

Under certain circumstances RG&A may disclose Personal Information where:

- required or authorized by law to do so, for example to a tax authority;
- a Client has consented to the disclosure;
- when the professional services RG&A is providing to a Client requires us to give Personal Information about a Client to a third party (for example, to a lender in a real estate mortgage transaction) the Client's consent will be implied, unless the Client tells us otherwise;
- where it is necessary to establish or collect fees;
- if RG&A engages a third party to provide administrative or support services to us (such as computer back-up services, shredding or archival file storage) and the third party is bound by our Privacy Policy;
- if we retain other professional firms on behalf of a Client; or

- if the information is already publicly known.

Limiting collection and retention of Personal Information

RG&A limits the collection of a Client's Personal Information to that which is necessary for the purposes identified in this Privacy Policy as same may be amended from time to time, or for any additional purpose identified to the Client before the collection of the Personal Information. As well, Personal Information is not used or disclosed for purposes other than those for which it was originally collected, except with the consent of the Client or as otherwise permitted by law.

RG&A will retain Personal Information only for so long as it is needed to fulfill the purposes for which it was obtained and to meet our professional requirements as set out by the Canadian Institute of Chartered Accountants and/or any other legal requirement, statutory or otherwise, from time to time.

Accuracy

RG&A strives to ensure that a Client's Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

Safeguards

RG&A endeavours to maintain adequate safeguards to protect against loss, theft, unauthorized access, disclosure, copying, use or modification of Clients' Personal Information in the care of the RG&A.

Accountability, Openness and Client Access

RG&A is responsible for the Personal Information under its control and has appointed a Chief Privacy Officer to oversee our efforts to comply in all material respects with applicable privacy legislation and the terms of this Privacy Policy. The Chief Privacy Officer and those designated by the Chief Privacy Officer address and investigate questions or concerns regarding a Client's Personal Information.

To reach the Chief Privacy Officer or a member the Privacy Team, please call 416-699-8070 or e-mail: PrivacyOfficer@goreca.com. A copy of this Privacy Policy and any future updates or amendments is available at www.goreca.com.

RG&A will provide a Client access to their Personal Information. The Client may correct or amend any inaccuracies in the Client's Personal Information. RG&A has the right to refuse a request for access to Personal Information if:

- Granting access would reveal confidential commercial information;
- Doing so would reasonably be expected to threaten the life or security of another individual;
- The information was collected for purposes related to the detection and prevention of fraud;
- The information would likely reveal personal information about another individual;
- The request is vexation or frivolous;
- The information would prejudice negotiation with you; or
- To protect our firm's rights and property.

Challenging Compliance

Clients are encouraged to discuss any privacy issues with an accountant handling their file, the Partners, or the Chief Privacy Officer.

Changes To This Privacy Policy

RG&A will from time to time review and revisit privacy practices and this Privacy Policy. In the event of any material amendment, an appropriate notice will be posted on RG&A’s Web site. All Clients are encouraged to contact RG&A to establish if any updates have been made to this Privacy Policy, which can be ascertained by the date listed at the top of this Privacy Policy. All updates and amendments to this Privacy Policy can be found at www.goreca.com.

RG&A Web site

Our Web site may contain links to other sites, which are not governed by this Privacy Policy. On our Web site, like most other commercial Web sites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

Communicating With Us

We recognize that convenience and quick access to advice must be balanced with security needs. We use many different means to communicate with clients, some of which are more convenient such as e-mail. Our emails are sent with industry standard 128 bit encryption. Such encryption however does not guarantee privacy and security as encrypted messages can nonetheless be subject to interception and translation. If you do not wish us to communicate with you by e-mail, please speak with the Privacy Officer about alternative arrangements.

I, _____, have read the policy as provided to me by Robert Gore, Chartered Accountant and I am in agreement with the policy.

Client Signature

Corporate Name (where applicable)

Date