Protecting your privacy is important to Borden Ladner Gervais LLP and its management corporations (collectively, "BLG", "we" or "us").

This Policy explains how BLG collects, uses and discloses personal information concerning its clients and other individuals ("you"), other than BLG's professionals, employees and agents.

Any personal information you provide to us will be treated with care and, subject to the terms of this Policy and applicable law. Our professionals, employees and agents are also subject to professional and ethical obligations relating to the confidentiality of information BLG receives in the context of providing legal services.

If you do not consent to the collection, use and disclosure of your personal information in accordance with this Policy, please do not provide any personal information to BLG. Of course, certain services can only be offered to you if you provide personal information to BLG, and therefore BLG may not be able to offer you those services if you choose not to provide us with required personal information.

Personal Information

The term "personal information" refers to any information about an identifiable individual or any information that allows an individual to be identified. In general, personal information does not include business contact information, such as your name, title or position, business address, business telephone or fax number. During your relationship with BLG, you may be asked to provide certain personal information concerning you and/or other individuals (such as witnesses, family members, adverse parties, employees, directors, officers, shareholders, investors, business partners, customers, etc.). Examples of such information include name, date of birth, home address and phone number, occupation, details of your government issued identification (driver's licence, passport or similar record), tax residency and identification, financial and credit information, billing and account information and other information relating to the provision of legal services by BLG.

Purposes for which Personal Information is Collected

BLG collects, uses and discloses personal information for the purposes identified at the time of collection, or as otherwise permitted or required by applicable law, including for the following purposes:

- to provide legal and other related services;
- to comply with our professional obligations, including the rules regarding client identification and verification;
- to establish and manage client relationships, including considering whether to establish such a relationship;
- administrative, management and business purposes, such as to issue invoices, administer accounts, collect and process payments, evaluate credit standing, fulfill contractual obligations, and to audit and protect our business operations;
- for any other purpose for which you have given your consent.

Limiting Collection, Use and Disclosure

We strive to limit the amount of personal information we collect to that necessary and appropriate for the identified purposes. We will not use or disclose your personal information for purposes other than those for which it was collected, except with your consent or as permitted or required by applicable law.

Consent

To the extent possible, we will obtain consent to collect, use and disclose personal information about an individual directly from such individual. However, if you provide personal information concerning another individual (including adverse parties and other individuals involved in legal proceedings) to BLG, you represent that, prior to submitting such information, you have obtained the necessary consent or authority to permit us to collect, use and disclose such personal information for the purposes set out in this Policy, or the collection, use and disclosure is permitted by applicable law.

BLG will not collect, use or disclose personal information without the consent of the individual(s) concerned unless we are permitted or required to do so by applicable law. We generally do not obtain the consent of the individual(s) concerned in the following circumstances:

- if a client provides personal information about a third person to us for purposes of our legal representation of the client;
- if legal, medical or security reasons make it impossible or impractical to seek consent; and
- when information is being collected for the detection and prevention of fraud or for law enforcement and seeking the consent of the individual may defeat the purpose of collecting the information.

Withdrawal of Consent/Opting-Out

You may vary or withdraw your consent to the use and disclosure of your personal information, or opt-out of certain uses and disclosures, subject to legal and contractual restrictions. To vary or withdraw your consent, please contact one of our Privacy Officers (identified below).

Consent for Secondary Purposes

BLG may also ask to use your personal information for the following secondary purposes:

- to develop our knowledge management systems and databases;
- to distribute BLG publications, invitations to seminars and events and other communications which BLG believes may be of interest to you; and
- to contact and communicate with you for the purpose of conducting market research, and evaluating clients service and satisfaction.

You will have a clear opportunity to decide if you will consent to our use of your personal information for these secondary purposes. As noted above, you may also change your mind and vary or withdraw your consent to our use of your personal information for secondary purposes.

Disclosure of Your Personal Information

Our professionals are subject to professional and ethical obligations and, as such, we will not disclose personal information that is subject to solicitor-client privilege unless our client has waived privilege or we are permitted or required to do so by law.

Subject always to our professional obligations and only for the purposes of providing legal services, BLG may disclose personal information to third parties (including adverse parties and their counsel, experts, witnesses, service providers), including in the context of legal proceedings and business transactions.

BLG may also disclose your personal information to your agent.

BLG may disclose your personal information to a government or regulatory entity that has asserted its lawful authority to obtain the information or where BLG has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to protect BLG's rights and property. If BLG is involved in a merger or other reorganization, BLG may disclose your personal information to the resulting organization.

BLG may also disclose personal information as otherwise required or permitted by applicable law.

BLG does not sell or exchange for consideration any personal information it holds.

Storing and Securing Your Information

BLG may store and process your personal information at BLG's offices in Canada, or elsewhere. To help protect the confidentiality of your personal information, BLG employs security safeguards that are customary in the legal profession and appropriate to the sensitivity of the information, including physical, organizational and technological measures. Examples of such measures include restricted access to offices, training of personnel, limiting access to information on a "need-to-know" basis, using passwords and well-defined internal policies and practices.

Third Party Service Providers

To the extent BLG employs third-party service providers to store, handle or process personal information on our behalf (*e.g.*, data storage and processing, cloud computing, application hosting or office services), we use contractual and other means to provide a comparable level of protection while the information is being stored, handled or processed by those service providers.

Our service providers are committed by contractual agreements with us to protect your personal information from unauthorized access, collection, use or disclosure. Our service providers are not permitted to disclose your information to others.

Some of our service providers may store your personal information in other countries. If it is required by law or court order, your personal information could be made accessible to legal authorities, including law enforcement and national security authorities of those countries.

If you have questions about the collection, use, disclosure or storage of your personal information by our service providers outside of Canada, or you would like to obtain more information about our policies and practices with respect to service providers outside of Canada, please contact one of our Privacy Officers listed below.

Access to Personal Information

You may request access to your personal information and/or information about BLG's collection, use and disclosure of that information by contacting our Privacy Officers, in writing, at the addresses identified below.

Contact Our Privacy Officer

Allison Foord
Borden Ladner Gervais LLP
1200 Waterfront Centre

200 Burrard Street
P.O. Box 48600
Vancouver, BC V7X 1T2
AFoord@blg.com

Subject to certain exceptions prescribed by law, you will be given reasonable access to your personal information and will be entitled to challenge the accuracy and completeness of that information and, to the extent that you have proven such inaccuracy or incompleteness, have it amended as appropriate. Examples of such exceptions include information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

You can help BLG maintain the accuracy of your information by notifying BLG of any changes to your personal information.

If you have any inquiry or complaint that relates to BLG's policies or procedures relating to the handling of personal information, we invite you to communicate with one of our Privacy Officers.

If we find out there has been a breach of our security safeguards and there is a real risk of significant harm to you, you will be notified unless otherwise prohibited by law.

Web Site and Electronic Communications

BLG's Web Site and Electronic Communications Privacy Policy is an integral part of this Policy and it governs how BLG collects, uses and discloses the personal information you may provide while using BLG's web site and in its electronic publications, newsletters, and announcements.

Changes to Privacy Policy

Privacy laws are rapidly evolving and, as a result, this Policy may be changed by BLG from time to time in BLG's full discretion without any prior notice or liability to you or any other person. The collection, use and disclosure of your personal information by BLG will be governed by the version of this Policy in effect at that time.