

Effective date: September 30, 2009

VITRIUM SYSTEMS INC. - PRIVACY POLICY

1. OBJECTIVE AND SCOPE OF POLICY

Vitrium Systems Inc. (“Vitrium” or the “Company”) is committed to protecting the privacy of customers and readers (“Readers”) of documents accessing Vitrium’s web-based applications and websites (collectively, the “Website”), employees and others dealing with the Company. This policy informs you of the Company’s practices concerning the collection, use and disclosure of personal information and ensures compliance with Canadian privacy laws, including the Canadian *Personal Information and Protection and Electronic Document Act* (“PIPEDA”) and the British Columbia *Personal Information Protection Act* (“PIPA”). Any questions regarding compliance with other privacy laws should be directed to the Privacy Officer identified below.

Company employees and contractors or agents who provide services to the Company that entail dealing with personal information are required to comply with this policy.

Please note that Company customers who use the Website for their PDF documents to collect personal information (“Publishers”) are responsible for their use and disclosure of such personal information, and the Company declines all responsibility for such use and disclosure.

2. WHAT IS PERSONAL INFORMATION?

This policy applies to “personal information”. This is defined as any information about an identified or easily identifiable individual. Personal information does not include information about corporations or other entities or information about individuals not associated with their identity.

Personal information is very broadly defined and includes unrecorded information and information recorded in any form, including electronically. Personal information includes relatively obvious or publicly available information such as home or business telephone number or email address, through to more sensitive information such as credit card numbers or other financial information.

Personal information includes specific information about how a Reader used a document (e.g. when a user accessed a document, how many times it was opened, how long it remained open, whether it was printed) (“Reader Use Data”), but only if associated with an identifiable individual.

Any aggregated Reader Use Data about a document collected through the Website in order to allow Publishers to improve the effectiveness of their documents is not considered personal information. While such information is compiled from personal information, because in aggregated form it cannot be attributed or related to a specific individual, it is not considered personal information.

3. THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION BY VITRIUM

Vitrium collects only such personal information about individuals as is reasonably required to provide our products and services to them. Generally speaking, the Company will obtain consent for the collection, use and disclosure to others of personal information, subject only to exceptions permitted or required by law. In most situations when visiting the Website or otherwise dealing with Vitrium, you will be asked to voluntarily provide personal information about yourself or your organization and the use of the information will be obvious (e.g. contact information to establish a customer account). In those situations, your voluntarily providing the information constitutes sufficient implied consent to such use. In some situations where the use or disclosure of the personal information may not be apparent, the Company will seek your consent (e.g. “opt-in” or “opt-out” pop-up boxes).

Website Visitor Personal Information

Vitrium collects personal information from Website visitors who register for services including:

- One-to-one demos
- Webinars
- Special pricing
- Contact us
- Full System Tour video demo

When you select the “Remember me” option in forms on the Website, your information is stored in a cookie. This is provided as a convenience, so that you do not have to re-enter your information when requesting additional services.

The Website automatically logs other information from visitors including:

- URL and IP address
- browser type and language
- date and time of requests

Vitrium uses the personal information of Website visitors to provide services and manage relationships with customers and prospective customers including, amongst other things:

- to provide visitors with customized services
- to audit, research and analyse how visitors interact with the Website, in order to improve content.

Like most websites, Vitrium’s Website places a “cookie” on the browser of visitors to the Website. The cookie only collects information about the visitor’s access to the Website and that information is only used to facilitate a visitor’s use of the Website and improve the content and relevance of the Website. Visitors can remove cookies by adjusting

settings on their browser, but this may impair the operation of Vitrium's applications or use of the Website for the visitor.

Publisher/Customer Personal Information

Vitrium collects and uses personal information in order to provide Publishers/customers with customized services. For instance, Vitrium may send out automated emails to notify Publishers of:

- Billing alerts
- Planned service outages
- New features
- New product releases

When customers create an account, they will be asked whether they would like to receive emails regarding system updates, helpful tips and upcoming user events. Please add these addresses to your spam filter white lists. Please do not respond to these emails or send emails to them.

Marketing Communications

Vitrium considers that it has the implied consent of individuals who have provided contact information when visiting the Website or as customers to forward occasional email marketing communications. Recipients who do not wish to receive such communications can request to be removed from the email list by following the instructions on the email.

Collection, Disclosure or Use Without Consent

There are circumstances permitted under applicable privacy laws where the collection, use, or disclosure of personal information may be done without consent and other situations where collection, use or disclosure is required by other legislation. Such situations include:

- (a) Where disclosure of information is required by applicable legislation or by order of an authorized court, tribunal, or regulatory or law-enforcement agency;
- (b) Where the Company believes, on reasonable grounds that it is necessary to protect the health or safety of you or another;
- (c) Where it is necessary to collect monies owing to the Company or respond to proceedings against the Company; and
- (d) As part of an investigation into possible breach of an individual's obligations to the Company or proceeding involving the Company.

4. COLLECTION, USE AND DISCLOSURE OF READER PERSONAL INFORMATION

PUBLISHERS CAN CONFIGURE THE WEBSITE TO REQUEST PERSONAL INFORMATION ABOUT READERS, WHICH IS STORED ON SERVERS PROVIDED BY VITRIUM'S THIRD PARTY HOSTING PROVIDER.

WHILE PUBLISHERS ARE ENCOURAGED TO INCLUDE A PRIVACY DISCLOSURE STATEMENT FOR READERS, PUBLISHERS MAY DELETE OR EDIT THE DISCLOSURE STATEMENT. THEY MAY ALSO CHOOSE WHETHER OR NOT TO ALLOW FULL ACCESS TO CONTENT FOR READERS WHO DO NOT AGREE TO SUBMIT INFORMATION REQUESTED ON THE FORM.

Because Vitrium does not control the content of Publisher disclosure statements or how Publishers handle any personal information collected through the Website, Vitrium is not responsible for Publisher privacy practises. Readers with concerns about Publisher privacy practises should address them to the applicable Publisher directly.

Reader Use Data is only shared with the Publisher of the applicable document. Vitrium itself may review Reader Use Data and responses to survey forms, but only for the purpose of evaluating and improving the Website and reporting to the Publisher.

5. DISCLOSURE OF PERSONAL INFORMATION

The Company does not sell, trade, barter or exchange for consideration any personal information it has obtained, including Reader Use Data (except to the Publisher of the document). The Company does use contractual service providers ("Service Providers") to assist in providing services which entails sharing personal information about customers. Service Providers are involved in, amongst other things:

- (a) Storing and providing access to customer information, including information needed for billing and accounting;
- (b) Providing webinars and other services; and
- (c) Storing and providing access to customer and Reader data.

The Company selects reputable Service Providers and generally endeavours to ensure they comply with the principles outlined in this policy and maintain the security of the data. Service Providers who receive access to personal information must agree to a confidentiality agreement produced by Vitrium or included in the master service agreement between Vitrium and such Service Provider before they are authorized by Vitrium to provide required services.

As set out above, there are a limited number of situations where disclosure of personal information collected by the Company is either required by law (e.g. legislation entitling

law-enforcement agencies to obtain information) or disclosure without consent is permitted by law (e.g. an emergency where your consent cannot be obtained).

6. ACCURACY AND SECURITY OF PERSONAL INFORMATION

The Company endeavours to ensure that all personal information in its possession is as accurate, current and complete as possible for the purposes for which it is used by the Company. You can assist us by advising us of any changes in your personal information (e.g. changes in your address, phone number or email address).

The Company takes appropriate security measures to ensure that both paper and electronic records containing personal information are secure from loss, unauthorized use, access or copying, disclosure or modification. Security measures include encryption of both customer and Reader personal information transmitted electronically, password protection for access to customer account information, locking areas containing sensitive special personal information and general security of our offices. Our computer systems require the use of passwords to gain access to sensitive personal information. The Company also limits access to personal information to those who “need to know” in order to provide you with products or services.

7. ACCESSING AND UPDATING PERSONAL INFORMATION

Publishers are responsible for Reader Use Data and providing access to it. Vitrium is unable to do so. The Company allows individuals to have reasonable access to their personal information kept by Vitrium and will endeavour to provide requested information within reasonable time and generally within 30 days following a written request. Individuals may request:

- (a) Information about what types of personal information are collected, how it is used, and to whom it is disclosed; or
- (b) To review some or all personal information about them kept by the Company,

upon written request to the appropriate manager or to the Privacy Officer identified below.

Although the Company will generally comply with such requests, the Company may decline access to personal information on grounds permitted or required under applicable legislation, including the following situations:

- (a) Where the requested personal information does not exist, is not recorded or cannot be located;
- (b) Where the cost of assembling, retrieving and providing access to the personal information would be disproportionate to the benefits of access;

- (c) Where such disclosure would entail disclosing personal information about another person, e.g. a person who made a comment or observation about the individual making the access request;
- (d) Where the information was collected without consent for the purpose of an investigation or proceeding and the investigation or proceeding has not been completed.

Individuals may request that the Company correct records of personal information. If the Company concludes the requested change is unwarranted, it will so advise the requesting person, but will append the requested change to the record kept by the Company.

8. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

The Company endeavours to only retain personal information for so long as it is either:

- (a) required to be retained by law (e.g. for tax purposes); or
- (b) reasonably necessary for Company business needs,

subject to any specific requirement under applicable privacy laws.

When personal information is no longer needed, it will be destroyed in a suitably secure manner (e.g. shredding of paper records containing personal information).

9. CHANGES TO PRIVACY POLICY AND PRACTISES

In the event Vitrium intends to materially change this policy or its privacy practises or to materially change its use of personal information previously collected, it will publish notice of such changes on the Website.

COMPLAINTS OR QUESTIONS

If you wish to access your personal information or have a question or concern about this policy or Vitrium's privacy practices, you may contact the Privacy Officer for the Company who may be reached at 1-866-403-1500 or privacy@vitrium.com.

Alternatively, if you have any concerns regarding Vitrium's privacy policies or practises, you may contact your local privacy authority, where applicable.