

STEP PRIVACY POLICY

Introduction

Protecting the privacy and the confidentiality of personal information -- over the Internet, on the telephone, or through our offices -- has always been fundamental to the way the Saskatchewan Trade and Export Partnership (STEP) conducts its affairs. STEP operates on the basis of a Privacy Policy and related procedures that guide the handling of the personal information collected. This privacy statement has been created to demonstrate STEP's firm commitment to protecting the privacy of its members, partners and potential Web site visitors. This policy and related procedures are consistent with the Canadian Standards Association Model Code for the Protection of Personal Information (herein "CSA Model Code") and applicable privacy legislation.

Privacy Statement

This policy deals only with personal information handled by STEP. Personal information is information about an identifiable individual, excluding business contact information. The following explains how STEP handles personal information. STEP reserves the right to change this policy and it may be updated periodically. These changes may affect the use of personal information. Accordingly, please check for changes regularly.

Accountability

STEP is accountable for all personal information under its control. STEP's Privacy Officer is the Vice-President who is designated as responsible for the STEP privacy policy. The Privacy Officer can be reached by:

- email, gadamson@sasktrade.sk.ca
- telephone, (306) 787-2222
- fax, (306) 787-6666 or
- mail, PO Box 1787, Regina, SK. S4P 3C6

Any questions about STEP's handling of personal information should be directed to the Privacy Officer. In cases where the question concerns an access request, individuals must follow the request process described under Accuracy of and Access to Personal Information Collected.

Purposes for Collection, Use and Disclosure of Personal Information

The purpose for which STEP collects personal information will be identified at or before the time the information is collected. Personal information may be collected for such purposes as: administering STEP membership and providing member services; registering for STEP events, for example the Annual General Meeting; purchasing various products or services and processing and administering them or other purposes as necessary. STEP will not use personal information for any other purpose than identified at or before the time of collection.

Member Services

STEP may collect employee contact information from its members in order to:

- send out newsletters and other relevant information
- inform members of upcoming STEP events
- send out invoices and otherwise administer STEP membership

This contact information is voluntarily provided by STEP members. Members may, at any time, be taken off of STEP mailing lists at their request.

Consent

STEP seeks consent for all personal information it collects, uses and discloses through information provided to individuals prior to collection, or at the time of collection. For information which is considered to be more sensitive, for example credit card numbers, STEP will ask for a signature as a sign of consent. If information is voluntarily provided, this is interpreted as consent to the collection, use and disclosure of personally identifiable information as described in this Privacy Policy. As required by the CSA Model Code, STEP will not use personal information for any purpose other than that for which consent has been provided. Should STEP require use of personal information for a new purpose, consent will be sought for that new use.

Limits for Collecting, Using, Disclosing and Keeping Personal Information

STEP does not collect, use or disclose personal information of individuals except when individuals give consent and provide the information on a voluntary basis. There may be occasions where more specific personal information is necessary for STEP to proceed with a request for information, or provide a product or service. In such cases, STEP will describe the information required. In all such cases, STEP limits the amount and type of information collected to only the personal information that is required to provide the individual with the requested information, product, or service. STEP collects only information that is voluntarily provided by the individual and undertakes that such information will be kept strictly confidential.

STEP may disclose personal information collected by it without the knowledge or consent of the individual, for example to its lawyers; for purposes relating to an investigation under, the enforcement of or the administration of a law or where required by law to disclose the information. STEP will not use or disclose personal information without the knowledge or consent of the individual except as authorized by applicable law.

STEP retains personal information only as long as is necessary to provide the individual with the requested product, service or information. For example, if personal information is given to register for an event, the personal information will only be used for this event and will then be deleted or destroyed. In some cases, however, legal reporting or retention requirements necessitate that STEP retains information for a specific amount of time. In general, STEP retains personal information for a period not longer than seven years, in secure storage.

STEP does not sell or trade any personal information with third parties. Information may be transferred to third parties where information processing is outsourced by STEP in the course of its activities or administrative procedures in specific cases. Where personal information is transferred to a service provider for processing, STEP requires service providers to respect this Privacy Policy. Service providers are restricted from using or disclosing personal information transferred

to them for any purpose other than the provision of services to STEP. Any personal information that STEP retains is kept in such a manner as to ensure its security and confidentiality at all times.

Safeguarding Personal Information

STEP respects the privacy of its members, partners, potential Web site visitors and internet users and will protect that privacy as vigorously as possible. Personal information is stored in electronic and physical files that are secure. Security measures include secure locks on filing cabinets, and using industry standard techniques such as firewalls and restricted access to computers.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while STEP strives to protect personal information, it cannot ensure or warrant the security of any information transmitted to it or received from it electronically. This is especially true for information transmitted via e-mail. STEP has no way of protecting that information until it reaches STEP. Once a transmission is received, STEP makes its best efforts to ensure its security on its servers. Internally, access to personal information is restricted to employees who need access to the information in order to do their jobs. These employees are limited in number, and are knowledgeable about and committed to our privacy policies.

Accuracy of and Access to Personal Information Collected

STEP makes every effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes. STEP does not routinely update personal information. STEP makes readily available to individuals its Privacy Policy and related procedures for managing personal information. Customer access to the Privacy Policy and related procedures is provided on STEP's Web site and in written form. Any questions about the handling of personal information by STEP can be raised with the Privacy Officer.

At the written request of an individual, he or she may view or edit their personal information as collected by STEP. STEP will inform them of what personal information it has about the individual, what it is being used for and, in cases where it has been disclosed, to whom it has been disclosed. There may be exceptional circumstances as provided by the CSA Model Code under which STEP may not be able to give an individual access to personal information held about them by STEP. In this case STEP will explain the reason for this lack of access, as provided by the CSA Model Code.

To make a request, please send a letter, email or fax addressed to our Privacy Officer at the address indicated above. In any written request, please include the following information:

- Name
- Contact details
- Nature of the request, for example:
 - view and/or edit information
 - inquire regarding use and/or disclosure
- If an inquiry concerns a specific transaction, please indicate the date of the transaction, and provide a receipt number if applicable.

STEP will reply to requests in no later than thirty days after receipt of the request, or if it is not able to respond within this time period, a notice of extension will be sent.

Questions

Any questions or comments about STEP's handling of personal information should be directed to the Privacy Officer.

Use of the STEP Web Site

STEP believes that online privacy is important to the success of the Internet and electronic commerce in general and is strongly committed to each visitor's right to privacy. This statement sets forth STEP's Privacy Policy for its Web site located at <http://www.sasktrade.sk.ca> and describes the practices that STEP follows in respect to the privacy of the users of this site. By accessing and using materials from this Web site or sending or posting materials to it, you (the "user") agrees to the terms of this privacy commitment and to our practices to collect, use or disclose personal information. This Privacy Statement may be updated periodically to reflect enhancements to the STEP web site that may affect the use of personal information. Accordingly, please check back periodically.

Information on this Web Site

Information which includes all facts, data and other information, collectively the "Information" in the pages of this Web site is of a general nature, is intended only for informational purposes, is subject to change without notice, and is not intended to be relied on by visitors as binding legal advice on any particular matter. Individual information provided to STEP to gain access to any feature of this Web site will not be sold or made available to any third party, except where information processing is outsourced by STEP in the course of its regular administrative procedures.

STEP reserves the right to perform statistical analyses of aggregated user behavior and characteristics, in order to measure interest in and use of the various sections of its site so as to improve design and navigation and to gather information for marketing purposes. Only aggregated data from these analyses, not individual data, will be used for this purpose. "Cookies" are not attached to the STEP Web site. A "cookie" is a piece of data that is stored on the hard drive of a computer that contains information about use of the Web site. Other Web sites may contain "cookies" that accumulate information about web site use, for example a record of the Web sites that an individual has visited.

Accuracy of the Information on this Web Site

The information is believed to be accurate, complete and current when posted, but STEP cannot guarantee that it will remain accurate or complete or that it will be current at all times. STEP is not responsible for direct, indirect, special or consequential damages, regardless of the cause, arising out the use of this Web site.

Accuracy of Information on Linked Web Sites

Through the links to other sites found on the STEP Web site, the user may enter domains that are beyond the boundaries of STEP and, once there, STEP is not responsible for the privacy practices or the content of these Web sites. STEP has no control over the accuracy, completeness or relevance of the information on these sites and provides links to these sites solely for the information and convenience of visitors to our Web site.

Copying Information from this Web Site

The information on the STEP Web site may be used or copied provided that it is used or copied accurately, or is used in its entirety and/or that the source of the information is clearly identified. Only a member of STEP may use the information for commercial purposes. STEP is not responsible for the way in which the information may be used or copied. STEP reserves the right to change, delete or add information at any time.