



TERAGO INC.

PRIVACY POLICY

I. Purpose and Applicability

This policy applies to TeraGo Inc. and all of its subsidiaries (collectively, “**TeraGo**”) and has been approved by the Board of Directors of TeraGo Inc. at the recommendation of the Corporate Governance Committee. TeraGo believes that the security and integrity of personal information (as such term is defined under the *Personal Information Protection and Electronic Documents Act*, “**Personal Information**”) of its customers, employees, personnel, representatives, contractors, partners and suppliers are essential. TeraGo will take every reasonable measure necessary to protect Personal Information and carry out privacy practices in accordance with applicable Canadian laws and regulations, namely the *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”), privacy rules established by the Canadian Radio-television and Telecommunications Commission (CRTC) from time to time and Canada’s Anti-Spam Legislation (“**CASL**”).

II. Commitment to Privacy

TeraGo has in place privacy and security practices to safeguard Personal Information. These practices are reviewed, and if necessary revised as required. Additionally, TeraGo’s employees receive privacy training and must comply with TeraGo’s privacy practices, including this Policy as a condition of employment.

Privacy Impact Assessments

Lead by the Privacy Officer noted below and with the support of functional heads (including Vice Presidents, Directors and Managers, as applicable), TeraGo shall periodically carry out Privacy Impact Assessments (PIA) amongst its various departments. The purpose of the PIA is to evaluate the company’s various business processes and its use (if any) of Personal Information and compliance with PIPEDA and this Policy.

III. Collection, Use and Retention of Personal Information

Customer Personal Information

TeraGo collects Personal Information from customers, which may include: names, e-mail addresses, mailing addresses, phone numbers, IP addresses, financial information, and birth dates, for the purposes of providing our services, verifying credit information, issuing bills and collecting



payment for our services, understanding our customer and their needs to serve them better (including providing offers or improvements in our services) and to meet legal and regulatory requirements.

All Other Personal Information

Other than customers, TeraGo collects Personal Information for the purposes of operating and managing its business, for employment purposes, issuing invoices or payment of invoices, understanding our partners and vendors, and to meet legal and regulatory requirements.

Retention and Access to Personal Information

TeraGo will not use or disclose Personal Information for purposes other those for which it was collected for unless consent is obtained from the individual, such disclosure is required by law or a court order, or in limited circumstances to a third party in connection with the sale or divestiture of TeraGo's business, or a part thereof. TeraGo will maintain and store Personal Information for as long as it is necessary to meet the purposes in which it was collected. Upon request, TeraGo will inform an individual of the existence, use and disclosure of their Personal Information and gives them access to their Personal Information.

Accuracy of Personal Information

TeraGo seeks to ensure that Personal Information is accurate, complete and up-to-date. Individuals can challenge the accuracy and completeness of Personal Information that TeraGo retains and request amendments as appropriate.

IV. Electronic Communications from TeraGo

TeraGo will from time to time send out commercial electronic messages to individuals and companies for the purposes of providing information about TeraGo or its services. TeraGo will only send such communications in accordance with CASL and the contents of such communications will meet the requirements set out by CASL. Individuals or companies receiving commercial electronic messages from TeraGo will always have the option to "unsubscribe" or "opt-out" from future communications.

V. Additional Information About this Policy and Personal Information

TeraGo's Board of Directors has designated its General Counsel & Corporate Secretary to serve as the Privacy Officer at TeraGo to oversee and ensure TeraGo's compliance with this policy and to address any comments or complaints with respect to the matters referenced in this policy. TeraGo's Privacy Officer can be contacted at the following:



TeraGo Inc.
55 Commerce Valley Drive West
Suite 800
Thornhill, Ontario, Canada
L3T 7V9

Attention: Privacy Officer c/o Legal Dept.
Email: privacy@terago.ca