



PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT S.C. 2000 (PIPEDA)

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1. Privacy Statement

Your privacy is very important to us. This Privacy Policy discloses how Pinty's Delicious Foods Inc., collects, protects, uses and shares personal information gathered about you. Our privacy practices are consistent with:

- Applicable Canadian legislation of notice, choice, onward transfer, security, data integrity, access, and enforcement.

All Personal Information is collected in a fair and non-intrusive manner, with your voluntary consent. Personal Information is not accessible to anyone outside the specific function for which it is collected. Pinty's Delicious Foods Inc., respects the privacy of our customers, our employees, job applicants, and other visitors to our websites who may choose to provide personal information. We recognize the need for appropriate protections and management of personal information that you provide to us. This Privacy Policy will assist you to understand what types of information we may collect, how that information may be used, and with whom the information may be shared.

This Privacy Policy explains Pinty's Delicious Foods Inc., practices regarding the information collected online from users of our website. In an effort to comply with the law, and our commitment to protect your personal information, we provide the following, which discloses our policies.

2. Consent

This Privacy Policy applies to all information gathered for and on behalf of Pinty's Delicious Foods Inc., whether in writing, verbally or electronically, through any website operated by or on behalf of Pinty's Delicious Foods Inc., together with any and all future websites that are operated by or on behalf of Pinty's

Delicious Foods Inc., or participating in any program or service managed by Pinty's Delicious Foods Inc., you consent to the data collection and use practices described in this Privacy Policy. If you have questions about this Privacy Policy or the protection of your information, please contact our Human Resources department and the acting Privacy Officer.

BY SUBMITTING PERSONAL INFORMATION TO PINTY'S DELICIOUS FOODS INC., AND/OR BY ACCESSING AND USING THE WEBSITE, YOU AGREE THAT PINTY'S DELICIOUS FOODS INC., MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND THE TERMS AND CONDITIONS AS PERMITTED OR REQUIRED BY LAW.

3. Consent to Share and Disclose Information.

In addition to consenting to this Privacy Policy and the Terms and Conditions, including any relevant supplemental policies, you expressly consent to Pinty's Delicious Foods Inc., sharing the information that you have provided, as described herein. Pinty's Delicious Foods may share information with its Executives, Officers and Directors. In addition, Pinty's Delicious Foods Inc., may also share information with companies that provide support services to it, such as credit card processors, mailing houses, web hosts, technical support providers, fulfillment centers or other service providers or for enforcing or investigating transactions or business operations, because these companies may need information about you in order to perform their functions. These companies are not authorized to use the information Pinty's Delicious Foods Inc., shares with them for any other purpose, but Pinty's Delicious Foods Inc., does not control these companies. You agree that Pinty's Delicious Foods Inc., and those with whom it shares information (the "Recipients") may disclose and transfer your information nationally across Canada for any purpose relating to Pinty's Delicious Foods Inc., operations and programs.

4. Consent to Electronic Notice if there is a Security Breach

If Pinty's Delicious Foods Inc. Or a Recipient is required to provide notice of unauthorized access of certain security systems, you agree that Pinty's Delicious Foods Inc., or the Recipient, may do so when required or voluntarily by posting notice on the Website or sending notice to any email address Pinty's Delicious Foods Inc., or the Recipient has for you, in the good faith discretion of Pinty's Delicious Foods Inc., or the Recipient. You agree that notice to you will count as notice to any other individual for whom you are acting and agree to provide the notice to any such individual.

5. Type of information we may collect

Personal Information is defined as any information concerning the personal or material circumstances of an identified or identifiable individual. An identifiable person is one who can be identified, directly or indirectly, by reference to a Social Insurance Number and/or Identification Number (hereinafter "SIN") or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. Personal Information shall include but is not limited to: name, home address, home postal code, home telephone number, mobile phone number, email address, Social Insurance Number and/or Identification Number, financial information and employment related information such as may be found on resumes, applications, background verification information, or in employment references.

Pinty's Delicious Foods Inc., takes measures to maintain the confidentiality of your SIN to protect your SIN from unlawful disclosure, and to limit access to your SIN. Pinty's Delicious Foods Inc., will not make your SIN available to the general public, print your SIN on any card, require you to provide your SIN to access any products or services, transmit your SIN over the Internet unless the connection is secure or your SIN has been encrypted.

Non-personal information is information that is already a matter of public record or knowledge. Business contact information is considered non-personal information and not subjected to special protection and it can be routinely shared with anyone inside or outside of the business. Business contact information shall include but is not limited to: business name, business address, business telephone number, and is not considered personal information in certain jurisdictions. *Sensitive data* is information that can include but is not limited to, an individual's gender, racial or ethnic origins, politics, religion, trade union membership, veteran status, physical or mental health, disabilities, sex life, sexual orientation, or criminal (or alleged criminal) activities, proceedings or convictions. We will never collect sensitive data except to comply with Federal or Provincial legislative data requirements.

6. Internet Users - Cookies, Internet Protocol (IP) Address, Aggregate Information

Cookies - in addition to Personal Information, we use data collection devices such as "cookies" on certain web pages to help analyze our web page flow and measure promotional effectiveness. Cookies are pieces of information a website sends to an individual's hard drive while they are viewing the website. Cookies allow the website to remember important information that will make your visit to the site more useful. We use cookies to help improve your future visits. If you do not wish to receive a cookie or if you wish to set your browser to warn you each time a cookie is being sent, or if you wish to turn off all cookies, use the options on your browser to assist you. The "Help" option on your browser may assist you in changing your cookie preferences. Please note that by turning cookies off, you will not have access to many features available on our website.

Internet Protocol (IP) Address - an Internet Protocol (IP) Address is associated with your computer's connection to the internet. Pinty's Delicious Foods Inc., may use your IP address to help diagnose problems with Pinty's Delicious Foods Inc., server, to administer the Website and to maintain contact with you as you navigate through the Website. Your computer's IP address also may be used to provide you with information based upon your navigation through the Website. Pinty's Delicious Foods Inc., does not link IP addresses to any Personal Information.

Aggregate Information - is used to measure the visitors' interest in, and use of, various areas of the Website and the various programs that Pinty's Delicious Foods Inc., administers. Pinty's Delicious Foods Inc., will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate information, Pinty's Delicious Foods Inc., may undertake statistical and other summary analyses of the visitors' behaviors and characteristics. Although Pinty's Delicious Foods Inc. may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

7. Opt-Out of Email and Mobile Updates

You may have the opportunity to elect to receive email and mobile communications from Pinty's Delicious Foods Inc., Pinty's Delicious Foods Inc., will only email you or send you mobile alerts if you elect to receive them. If you elect to receive email and mobile communications, Pinty's Delicious Foods Inc., will send you occasional updates about new additions to the Website as well as special offers and promotions of which you can take advantage. If at any time you decide you would rather not receive these types of communications from Pinty's Delicious Foods Inc., you can opt-out by following the website instructions.

8. Children and Data Collection

Pinty's Delicious Foods Inc., adheres to all Federal and Provincial privacy protection standards. We care about the safety of children.

9. Our Use of Your Personal Information We use your Personal Information to facilitate the services you request. We have tailored our Privacy Policy to adequately advise of the use of your Personal Information.

10. Collection and Use of Employee Personal Information

Pinty's Delicious Foods Inc., also collects Personal Information from its employees and applicants (human resource data) in connection with administration of its Human Resources programs and functions. These programs and functions include, but are not limited to: job applications and hiring programs, compensation and benefit programs, performance appraisals, training, access to Pinty's Delicious Foods Inc., facilities and computer networks, employee profiles, internal intranet employee directories, Human Resource recordkeeping, and other employment related purposes.

It is the policy of Pinty's Delicious Foods Inc., to keep all past and present employee information private from disclosure to third parties. There are certain business related exceptions and they are:

1. To comply with federal or provincial agency requests;
2. Inquiries from third parties with a signed authorization from the employee to release the information, except in situations where limited verbal verifications are acceptable (see below);

3. Third parties with which Pinty's Delicious Foods Inc. has contractual agreements to assist in administration of company sponsored benefits.

11. Verifications of Employment

Prospective employers, financial institutions, and residential property managers routinely contact Pinty's Delicious Foods Inc., requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed on a confidential basis by the Human Resources Department or Payroll Department.

For written verification of employment requests, information will be provided only directly to the employee who may pass it on as appropriate or with the signed authorization of the employee to release information.

12. Medical Information

Pinty's Delicious Foods Inc. is compliant with federal and provincial regulations and only utilizes information related to the company sponsored healthcare plan on a "need to know" basis for administration of the healthcare plan.

13. Collection and Use of Customer Information

Pinty's Delicious Foods Inc., will not collect customer Personal Information, unless the customer contacts Pinty's Delicious Foods directly and authorizes the release of personal information in order to adequately address a customer's concern. Failure to provide necessary information may prevent Pinty's Delicious Foods Inc., from fully addressing any customer concerns. Pinty's Delicious Foods Inc. will not collect Personal Information, unless you contact Pinty's Delicious Foods Inc., directly. In the future, one of our affiliates may use this information to contact you regarding products or promotions, as well as other products and services, which may be of interest to you. If you do provide us with Personal Information we may use the information to contact you, via e-mail, regular mail, telephone or other means, to provide you with information that you requested about specific products or services, provide additional future information about products or services that may be of interest to you, and to learn about and develop products and services. If you do not want this information disclosed you may "opt out" of future contacts at any time.

14. Sharing of Personal Information

We may share Personal Information with our service providers, consultants and affiliates for our internal business purposes. Except as described in this Privacy Policy, Pinty's Delicious Foods Inc., will not share Personal Information with a third party, unless a customer requests, consents to such disclosure, or disclosure is required or authorized by law. Pinty's Delicious Foods Inc., reserves the right to disclose Personal Information to a third party if a law, regulation, search warrant, subpoena, or court order legally requires or authorizes us to do so. Pinty's Delicious Foods Inc., also reserves the right to disclose and/or transfer Personal Information to a third party in the event of a proposed or actual purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, or financing of all or any portion of Pinty's Delicious Foods Inc. Personal Information may be provided to a courier or freight forwarder to fulfill an order, which may have been requested from us.

Pinty's Delicious Foods Inc., service providers are prohibited from using Personal Information for any purpose other than to provide assistance to Pinty's Delicious Foods Inc. Service Providers are required to protect Personal Information disclosed by us and to comply with the general privacy principles described in this Privacy Policy.

15. Security

We endeavor to protect your Personal Information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our control. These measures include safeguards to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use and modification.

We safeguard your Personal Information on the Internet by using industry-standard practices. Although "guaranteed security" does not exist either on or off the Internet, we make commercially reasonable efforts to make the collection and security of such information consistent with our Privacy Policy and all applicable laws and regulations. We maintain physical, electronic and procedural safeguards as

appropriate to safeguard your Personal Information. We are committed to maintaining the confidentiality, privacy, and integrity of your transactions, and help to protect your confidential information - such as credit card numbers, online forms and financial data, from loss, misuse, interception and hacking.

16. Storage, Retention and Accuracy of Personal Information

Pinty's Delicious Foods Inc., insures that Personal Information is safeguarded against loss, access, use, modification, disclosure or other misuse. All reasonable steps are taken to prevent unauthorized use or disclosure of your Personal Information.

Pinty's Delicious Foods Inc., will retain your Personal Information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws and your consent to such purpose remains valid after termination of our relationship with you.

We take all reasonable steps to insure that your Personal Information is accurate, up-to-date, complete, relevant and not misleading.

17. Contact Information

You may contact the Privacy Officer to access, correct or delete your Personal Information. If necessary, the Privacy Officer will contact another individual to assist in completing your requested task.

If you have any questions or complaints, please contact the Privacy Officer. The Privacy Officer can be reached by telephone at (905)319-5300 or 1-800-263-7223; by Facsimile at (905)319-5303; by email at: privacyofficer@pintys.com; or by mail at Pinty's Delicious Foods Inc., 5063 North Service Rd. Suite 101, Burlington, ON L7L 5H6 CA. We will address your concern and attempt to resolve any problem.

18. Links to Non-Pinty's Delicious Foods Inc., Web Sites and Third Parties

Please note that our websites may contain links to other websites for your convenience and information. Pinty's Delicious Foods Inc., does not control those sites or their privacy practices, which may differ from Pinty's Delicious Foods Inc.'s privacy policy which cannot and does not apply to external websites. We do not endorse or make any representations about third party websites. The personal data you choose to give to unrelated third parties is not covered by the Pinty's Delicious Foods Inc., privacy policy. We encourage you to review the privacy policy of any company or website before submitting your Personal Information. Some third parties may choose to share their personal data with Pinty's Delicious Foods Inc., that sharing is governed by that third party company's privacy policy.

19. Changes to our Privacy Policy

Pinty's Delicious Foods Inc. will update this Privacy Policy occasionally. When Pinty's Delicious Foods Inc. posts changes to this Privacy Policy, we will also revise the "Last Updated" date below on Pinty's Delicious Foods Inc., Privacy Policy. If there are material changes to this Privacy Policy, Pinty's Delicious Foods Inc., will notify you by email, or by means of a notice on our home page. Pinty's Delicious Foods Inc., encourages you to review this Privacy Policy periodically to be informed of how we are protecting your information and to be aware of any changes to the Privacy Policy. Your continued use of the site after the posting of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. This Privacy Policy is incorporated into any Terms and Conditions governing the various websites and any programs or services operated or managed on or behalf of Pinty's Delicious Foods Inc.,. Any changes to this Privacy Policy are effective immediately after being posted by Pinty's Delicious Foods Inc.

20. Terms and Conditions of Website Use

The Terms and Conditions governing your use of Pinty's Delicious Foods Inc. will be posted on same website and available for your perusal. It will contains important provisions disclaiming and excluding the liability of Pinty's Delicious Foods Inc., regarding your use of our Website and provisions determining the applicable law and exclusive jurisdiction for the resolution of any disputes regarding your use of this Website. Each of these provisions applies to any disputes that may arise in relation to this privacy policy and the collection, use and disclosure of your personal information, and are of the same force and effect as if they had been reproduced directly in this Privacy Policy.

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