



ROHIT GROUP OF COMPANIES PRIVACY POLICY

This privacy policy is subject to change without notice. It was last updated on July 23, 2014.

The Rohit Group of Companies (“Rohit Group”, “Company”, “our”, “we”) understands that privacy and security are of paramount importance to our customers, employees, and website users. This statement will describe how Rohit Group collects, uses and discloses “personal information” and how Rohit Group safeguards that information. Rohit Group manages personal information that is provided in accordance with Alberta’s *Personal Information Protection Act* and any other applicable privacy legislation.

PERSONAL INFORMATION

Personal information is any information, in any form (i.e. paper, verbal, or electronic form), which can be attributed to an identifiable individual. This includes, for example, an individual’s name, home address and phone number, personal email address, credit and financial information, or other identifying numbers that would reveal the identity of an individual.

Business contact information (i.e. information on business cards) of an individual is not considered personal information.

Rohit Group’s employees are trained to appreciate the importance of privacy and safeguarding of personal information.

Purpose for Collection, Use, and Disclosure of Personal Information

Except as otherwise authorized by law, Rohit Group collects, uses, and discloses only the personal information that the Company needs for the purposes of providing service to our customers, including personal information needed to:

- Process and respond to customer inquiries
- Improve customer service
- Improve browsing experience and provide customers with the best possible service
- Alert customers to additional services and offerings
- Design and build better products for Rohit Group and to improve current products and services offered by Rohit Group
- Enforce website terms of use
- Comply with any legal and regulatory requirements.

Rohit Group may also, from time to time, summarize and compile personal information for internal statistical purposes in order to analyze our business. Personal information collected, used, or disclosed in this manner is used for analytical purposes only and is no longer identifiable.

Rohit Group usually collects personal information of customers directly from our customers. Rohit Group may collect customers’ information from other persons or third parties with customers’ consent or as authorized by law.

Rohit Group informs our customers, before or at the time of collecting personal information, of the purposes for which the Company is collecting the information. The only time the Company



does not provide this notification is when a customer volunteers information for an obvious purpose, or when consent is implied or otherwise not required by privacy legislation.

Customers may choose not to provide Rohit Group with their personal information in certain circumstances, subject to applicable legal requirements where the personal information is necessary for the Company to fulfill our legal obligations. Rohit Group respects customer decisions, but the Company may not be able to provide the customer with certain products and services if the necessary personal information is not provided.

Consent

Rohit Group collects, uses, and discloses personal information only in accordance with applicable privacy legislation, and with consent where consent is required. In certain circumstances, privacy legislation authorizes the collection, use, or disclosure of personal information without the consent of an individual, for example, if the use, collection, or disclosure of the information is necessary to respond to an emergency, or where it would otherwise be inappropriate to obtain consent. In certain circumstances, consent may be implied when a customer provides personal information for an obvious purpose.

Personal Information and Rohit Group's Website

Rohit Group operates active websites. Our Internet service provider(s) may collect information about the individuals who visit our sites and log the following information for statistical purposes: Internet address, domain name, date and time of visit to the website, pages and documents downloaded, previous website visited and type of browser used. This information is only used for statistical and website development purposes. If you visit our websites, you do so voluntarily and are deemed to consent to our collection of your personal information as described in this paragraph.

For more information about Rohit Group's websites, please refer to the Terms of Use.

Remarketing and Display Advertising

Rohit Group advertisements may be shown on Google networks, and other third-party vendors, across the internet. Rohit Group of Companies and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookies) together to inform, optimize, and serve ads based on an individual's past visits to our website.

Cookies are a relatively standard method by which web sites store information about your visit which can track your preferences, save your password and other details to make your next visit to our website more enjoyable and simplify navigation. Cookies help the Company analyze web site usage accurately and may also be used for Marketing or Re-Marketing purposes. They provide the Company with the type of internet browser you are using, type of computer operating system you are using, and the domain name of the website from which you linked to our web site or advertisement. This information is not considered Personal Information, as it is not information from which you could be identified.

If you prefer not to store cookies you can choose to do the following:

- Set your browser to notify you when you receive a cookie
- Set your browser to refuse to accept cookies
- Delete our cookies after visiting our site
- Browse our site using your browser's anonymous usage setting
- Not use our site

Some features of our web site may not function properly if you choose not to accept our cookies.

You may choose to opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Google Analytics Demographics and Interest Reports

Demographics and interests reports may be gathered through Google Analytics including:

Demographics

- Overview (overview of traffic by age and gender)
- Age (traffic by age ranges)
- Gender (traffic by gender)

Interests

- Overview (overview of traffic by affinity and other categories)
- Affinity categories (behavior by affinity categories)
- In-Market categories (behavior by in-market categories)
- Other categories (behavior by other interest categories)

These reports allow Rohit Group to see how our users engage over a date range, as well as understand who are users are and how their behaviour varies by attribute (i.e. male vs. female)

Information for these reports is derived from the third-party DoubleClick cookie and device identifiers.

TERMS OF USE

By using the Company website, you consent to the collection and use of your information by Rohit Group as described in the Privacy Policy currently in effect. Any changes to this policy will be posted to our website. You are responsible for periodically checking our website for changes to our Privacy Policy. If our Privacy Policy is not acceptable to you, please do not submit any of your Personal Information.

Our site contains copyrighted, trademarked or otherwise owned or licensed intellectual property of Rohit Group ("Content"). Content includes images, illustrations, designs, icons, photographs, trademarks, logos, text, software, sounds, music, the website as a whole and any other materials on the website.

You may download the Contents solely for your personal, non-commercial use, provided you keep all copyright and other proprietary notices with the downloads. No other type of use is permitted. Downloading or copying Content does not transfer any right, title or interest in any



Content to you. The downloading or export of software or technical data from this Site to any jurisdiction in violation of Canadian export laws is strictly prohibited.

User Submissions

You may not submit any information to Rohit Group that is or contains threatening, libelous, defamatory, scandalous, inflammatory, pornographic, profane or otherwise unlawful, abusive or obscene material. You are solely responsible for the contents of your submissions.

Links to Other Sites

If you have any concerns regarding any outside site linked to or from the Rohit Group website, please direct them to the owner of that outside site. Rohit Group is not responsible for any outside sites, services, or other material linked to or from this website and disclaims all liability for any injury you may experience by using such materials.

Disclaimer

Your use of this website is at your own risk. Rohit Group provides this website, contents and services offered through or from the website as is without express or implied warranty, including but not limited to the implied warranties of merchantability, fitness for a particular purpose or non-infringement. Some jurisdictions may not allow the exclusion of implied warranties, so some of the above exclusions may not apply to you. Rohit Group also does not warrant that your use of this website, the operation or function of this website or any services offered through or from this website, will be uninterrupted or error free, that defects will be corrected or that this website or its server are free of viruses or other harmful elements. In addition, Rohit Group does not make any representations regarding the currency, accuracy or reliability of information on this Site.

Indemnification

You agree to defend, indemnify and hold Rohit Group harmless from and against any claims, damages, costs and expenses, including attorney fees, arising from, or related to your use of the website or your violation of any of these Terms.

Miscellaneous

These Terms shall be construed according to Canadian law, without regard to conflicts of laws. Any dispute arising under or relating to these Terms, the Contents or the use of this website shall be resolved exclusively by the courts of the Province of Alberta.

Termination

If Rohit Group believes you have failed to comply with these Terms or for any other or no reason, Rohit Group may deny you access to this website immediately without notice. The restrictions, including restrictions with respect to the Content, disclaimers and liability limitations in these Terms shall continue to apply. Upon denial of access, you must promptly destroy all Content downloaded or obtained from this website as well as all copies of Content.



ROHIT GROUP SHALL NOT BE LIABLE FOR ANY DAMAGES RELATED TO THE USE OF OR INABILITY TO USE THIS WEBSITE, INCLUDING WITHOUT LIMITATION DIRECT, INDIRECT, SPECIAL, COMPENSATORY OR CONSEQUENTIAL DAMAGES, LOST PROFITS OR LOSS OF OR DAMAGE TO PROPERTY.

IF YOU ARE DISSATISFIED WITH THE WEBSITE, ANY OF ITS CONTENT OR ANY OF THESE TERMS, WE WELCOME YOUR SUGGESTIONS. HOWEVER, YOUR SOLE AND EXCLUSIVE LEGAL REMEDY IS TO STOP USING THE SITE.

PERSONAL EMPLOYEE INFORMATION

What is Personal Employee Information?

Personal Employee Information is defined as personal information relating to an individual (“Individual”) who is an employee/contractor or potential employee/contractor of Rohit Group, including those who work under an employment agreement, contract or as volunteers, that is collected, used, or disclosed for the purposes of establishing, managing, or terminating an employment relationship.

Collection, Use, and Disclosure of Personal Employee Information

Rohit Group collects, uses, and discloses Personal Employee Information to meet the following purposes:

- Determining eligibility for employment, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if they arise
- Investigating any incidents or accidents that occur in the workplace
- Administering pay and benefits
- Processing employee work-related claims (i.e. benefits, Workers Compensation, insurance claims)
- Complying with requirements of regulatory bodies (i.e. CRA, Service Canada)
- Complying with applicable laws (i.e. *Canada Income Tax Act*, *Alberta Employment Standards Code*)
- Other personal information that is reasonably necessary in order to establish, manage or terminate the employment relationship

Rohit Group only collects, uses and discloses the amount and type of Personal Employee Information that is reasonable to meet the above purposes.

The following is a non-exhaustive list of examples of Personal Employee Information that Rohit Group may collect, use, and disclose to meet those purposes, should they be reasonable to meet the above purposes:

- Contact information such as names, home addresses, telephone numbers, and email addresses
- Photo identification for security and identification purposes
- Driver abstracts and other information about driving records
- Criminal background checks, only when appropriate in the circumstances



- Employment history such as resumes, and information about educational background, work history and references
- Reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgment forms, workplace performance evaluations
- Benefit information such as forms relating to applications or changes to health and insurance benefits
- Financial information such as information needed in order to deposit paychecks and tax related information including social insurance numbers

Employment and Volunteer References

In certain cases, when an Individual's relationship with Rohit Group ends, other organizations might contact the Company in order to request a reference. It is Company policy not to disclose Personal Employee Information to other organizations. With the consent of the Individual, Rohit Group may confirm that the Individual was an employee/contractor/volunteer of Rohit Group, including details regarding their position, the date range, and other general information about the Individual's job duties.

Retention and Destruction of Personal Information

Rohit Group retains Personal Employee Information only as long as reasonably necessary to fulfill the purposes for which the information was collected, or for legal or business purposes.

Rohit Group will retain Personal Employee Information for at least three (3) years after the Individual's relationship ends with Rohit Group.

Rohit Group uses appropriate security measures when safeguarding Personal Employee Information, such as requiring that Individuals sign confidentiality agreements, keeping physical records in locked filing cabinets and using computer technology such as passwords, encryption, and firewall. In addition, we use appropriate safeguards and security measures when destroying Personal Employee Information, including shredding paper records and permanently deleting electronic records.

Access to and Correction of Records Containing Personal Information

Individuals have a right to access their own Personal Employee Information in a record that is in the custody or control of Rohit Group, subject to exceptions contained in privacy legislation.

All access requests for Personal Employee Information must be in writing and sufficient information must be provided to allow the Company to identify the personal information you are seeking. Requests are to be directed to Rohit Group's Privacy Officer.

Rohit Group makes every reasonable effort to ensure that the Personal Employee Information in the custody or under the control of Rohit Group is accurate and complete. If an Individual is aware of an error or omission in his or her Personal Employee Information that is in the custody or under the control of Rohit Group, or his or her Personal Employee Information requires updating, they are to let Rohit Group know and the Company will, subject to legal limitations, correct the information as soon as reasonably possible or annotate the records to indicate that the correction was requested but not made.



Individuals may make a request for access to their Personal Employee Information by writing to Rohit Group's Privacy Officer at the address provided below.

The Privacy Officer will assist the Individual making the access or correction request and will respond in a timely manner. The response provided will indicate whether access to the requested records will be granted, and if access is refused, provide an explanation for the reasons for the refusal. Individuals making an access or correction request will be informed that they may request that Rohit Group's decision be reviewed by Alberta's Information and Privacy Commissioner.

QUESTIONS AND CONCERNS

If you have a questions or concerns about any collection, use or disclosure of personal information by Rohit Group, Personal Employee Information, or about this policy, please contact our Privacy Officer:

Rohit Group of Companies
550 – 91 Street SW
Edmonton, AB T6X 0V1
Telephone: 780.436.9015
Fax number 780.437.6226
e-mail: privacy@rohitgroup.com

Any parties that are not satisfied with the response they receive may contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 – 6 Avenue, SW
Calgary, Alberta T2P 3W2
Phone: 403 – 297 – 2728 Toll Free: one – 888 – 878 – 4044
Email: generalinfo@oipca.ab.ca
www.oipca.ab.ca