

Island Timberlands LP

Personal Information Protection Policy

Island Timberlands Personal Information Protection Policy governs our relationships with our customers and employees. We respect the privacy of our customers and employees and we are committed to keeping your personal information accurate, confidential, secure and private. We have adopted the following policy to ensure that Island Timberlands continues to meet its commitment to privacy.

In the course of providing these services, Island Timberlands may consensually collect certain personal information about our customers and employees.

“Personal Information” means information about an identifiable individual customer or employee. This may include without limitation, the individual's name, address, age, gender, income, employment status, credit history, debts and liabilities, income, personal preferences and other information about his or her family. Personal information does not include the name, title or business address or telephone number of an employee of an organization.

While we have always respected our customers and employees privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's Personal Information Protection Act (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

The Island Timberlands Personal Information Protection Policy is based on, and complies with, the British Columbia Personal Information Protection Act and Canada's *Personal Information Protection and Electronic Documents Act* (“PIPEDA”), which includes the Ten Privacy Principles outlined in the Canadian Standards Association *Model Code for the Protection of Personal Privacy*. For more information about this legislation, please visit the official web site of the Privacy Commission of Canada at <http://www.privcom.gc.ca>.

This privacy policy describes the ten principles that Island Timberlands follows to ensure that we protect our customers' and employees' personal information when we collect, use or disclose it in the course of carrying on commercial activities in Canada or the United States. All of our employees who have access to personal information must adhere to the Island Timberlands policy and related procedures. To this end, Island Timberlands appointed a Privacy Officer to ensure compliance by all our employees.

This introduction and the following sections, read as a whole, comprise the Island Timberlands Policy:

- The Ten Principles of Privacy
- Application of the Ten Privacy Principles
- The Kind Of Information We Collect
- How We Use Your Information
- When We May Disclose Your Personal Information
- Who We May Share Your Information With

- How We Safeguard Your Information
- Web Site Security
- Accessing and Amending Your Personal Information
- Opting Out
- Questions, Concerns and Complaints

1. The Ten Principles of Privacy

The following ten principles govern our actions as they relate to the use of our customers' and employees' personal information:

- Principle 1 – Accountability
- Principle 2 – Identifying Purposes
- Principle 3 – Consent
- Principle 4 – Limiting Collection
- Principle 5 – Limiting Use, Disclosure and Retention
- Principle 6 – Accuracy
- Principle 7 – Safeguarding Personal Information
- Principle 8 – Openness
- Principle 9 – Customer and Employee Access
- Principle 10 – Addressing Customer Complaints

Principle 1 – Accountability

Island Timberlands is accountable for all personal information in our possession or custody, including personal information disclosed to third parties for purposes of providing services requested by our customers or employees.

Principle 2 – Identifying Purposes

Island Timberlands will inform you of the purposes for which it is collecting any personal information, unless otherwise apparent, before or at the time the information is collected.

Principle 3 – Consent

Island Timberlands will obtain consent from our customers or employees before or when we collect, use or disclose their personal information.

A customer's or employee's consent can be express, implied, or given through an authorized representative. A customer or employee can withdraw consent at any time, with certain exceptions. Island Timberlands, however, may collect, use or disclose personal information without the customer's or employee's knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or required by law.

Principle 4 – Limiting Collection

The information collected from the customer or employee will be limited to those details necessary for the purposes identified to the customer or employee. Information will be collected by fair and lawful means.

Principle 5 – Limiting Use, Disclosure and Retention

Personal information will only be used or disclosed for the purpose for which it was collected

unless the customer or employee has otherwise consented, or when it is required or permitted by law. Personal information may only be retained for the amount of time needed to fulfill the purpose for which it was collected.

In certain exceptional circumstances, Island Timberlands may have a legal duty or right to disclose personal information without our customers' knowledge or consent with respect to matters that concern the company's or the public's interest.

Principle 6 – Accuracy

Island Timberlands will keep personal information as accurate, complete and current as necessary to fulfill the identified purposes for which it was collected. Customers or employees may have this information amended where it is found to be inaccurate or incomplete.

Principle 7 – Safeguarding Personal Information

Personal information is safeguarded using measures appropriate to the sensitivity of the information.

Principle 8 – Openness

Island Timberlands will make information available to our customers and employees about the policies and procedures Island Timberlands use to manage personal information. Customers and employees have access to this information through our web site, or through alternate means if requested.

Principle 9 – Customer Access

Upon written request, a customer or employee will be informed of the existence, use and disclosure of their personal information, and will be given access to it. Island Timberlands will respond to such requests as efficiently as possible. If Island Timberlands is prohibited from providing such access we will explain the reasons for the lack of access, except where prohibited by law.

Principle 10 – Addressing Customer Complaints and Suggestions

Island Timberlands has policies and procedures to receive, investigate and respond to customers' or employees' complaints and questions. Customers and employees may contact the Island Timberlands Privacy Officer to express any concerns or to request access to their personal information. The contact information for this individual is provided below in section 3.

2. Application of the Ten Privacy Principles

2.1 The Kind Of Information We Collect

Island Timberlands gathers and uses personal information in order to provide you with the services you have requested or to offer additional services in which you may be interested. Providing us with your personal information is your choice, however, we may not be able to provide you with certain services if you do not provide us with certain information.

The nature of your request will determine the kind of personal information we might ask for.

For example, information that is typically required to provide a customer with our services includes:

Name,
Address,
Phone number(s),
Relevant financial information.

If there are tax implications related to a customer's financial activities, the federal government requires that we ask for your Social Insurance Number for tax reporting purposes pursuant to the *Income Tax Act*.

Island Timberlands may keep a file with your contact history to be used for inquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you.

If you visit Island Timberlands web site, we do not collect personally identifiable information about you unless you provide it. All information that you do provide us with is securely maintained and kept strictly confidential.

2.2 How We Use Your Information

At Island Timberlands we use personal information for two general purposes:

1. To communicate with you in order to provide you with our services or information.
2. To make a credit assessment if you are doing business with us for the first time.

We will only use personal information for the purpose that we have disclosed to you. If we want to use your information for a different purpose, we will notify you and ask for your consent first.

2.3 When We May Disclose Your Personal Information

Island Timberlands is obliged to keep your personal information confidential *except under the following circumstances*:

- **When Authorized by You**
- **When Required by Law**
- **When Permitted by Law**

(i) When Authorized by You

Many of the services offered by Island Timberlands require us to obtain personal information about you in order to perform the services we have been engaged to provide. We will use this information to tailor products to meet your needs and objectives. We will always obtain consent from you first, and we will never use the information for purposes other than those we have told you about.

(ii) When Required by Law

The type of information we are legally required to disclose usually relates to government tax reporting requirements. However, in some cases, such as under a court order, we may be required to disclose certain information to persons specified in the court order. We will only provide the specific information requested and only upon being satisfied that the authorities have legitimate grounds to request the information.

(iii) *When Permitted by Law*

The legislation has provided certain situations where Island Timberlands is legally permitted to disclose personal information without your consent. Examples include situations involving the collection of debt in arrears, or suspicion of illegal activities.

2.4 Who We May Share Your Information With

(i) **Island Timberlands**

In the course of daily operations, access to sensitive personal information is limited to those employees with a legitimate reason for accessing it. As a condition of their employment, Island Timberlands employees are required to follow all applicable laws and regulations, including this privacy policy.

Unauthorized use or disclosure of confidential customer or employee information by an Island Timberlands employee is prohibited and may result in disciplinary measures.

(ii) **Island Timberlands Affiliates**

In order to better meet your needs; we may share some of your personal information with our affiliates. We will only do this with your express consent and you may withdraw this consent at any time. The procedure for withdrawing consent is outlined below under the section “2.8 Opting Out”.

Island Timberlands affiliates are companies that are owned 50% or more by Brookfield.

2.5 How We Safeguard Your Information

Island Timberlands has controls in place to maintain the security of our information and information systems. Customer files are stored according to the sensitivity of the information contained therein. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where personal information is gathered, processed or stored is limited to authorized employees.

When you telephone an Island Timberlands employee to speak about your file, you may be asked for some personally identifying information. This type of safeguard is designed to ensure that only you, or someone authorized by you, has access to your file.

2.6 Web Site Security

In order to serve you better, Island Timberlands offers customers access to certain information through our web site. For instance, www.islandtimberlands.com provides general information about Island Timberlands and the services we offer.

If you visit Island Timberlands web site, we do not collect personally identifiable information about you unless you provide it. All information that you do provide us with is securely maintained and kept strictly confidential.

2.7 Accessing and Amending Your Personal Information

As a customer or employee, you have the right to access the personal information we keep in your file and you have the right to verify or amend the information if it is shown to be inaccurate. If you would like to view the personal information held in your file, please make a written request to the Privacy Officer at the address listed below, under “3. Questions, Concerns and Complaints”. We will respond to your request as efficiently as possible.

To make a change, please make a similar request in writing to the Privacy Officer.

2.8 Opting Out

In order to provide you with our services/products, Island Timberlands will, with your consent, share your personal information with other Island Timberlands affiliates. Should you not want to receive promotional materials from or have your personal information shared with these companies please contact Island Timberlands Privacy Officer at the address, phone number or email address provided in Section 3 below.

3. Questions, Concerns and Complaints

If you have any questions, concerns or complaints about your personal information, or about the Island Timberlands Policy, please contact Island Timberlands Privacy Officer using the following contact information:

Island Timberlands Privacy Officer: Mike Cass

Address: 65 Front Street, 4th Floor, Nanaimo, B.C. V9R 5H9

Phone Number: 250 755-3518

Email Address: mcass@islandtimberlands.com

Approved: Darshan Sihota

Process Owner: Mike Cass

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