

PRIVACY POLICY

By using the website www.panocap.on.ca (collectively the "Website"), you are agreeing to be bound by this policy.

Pano Cap Canada Ltd. ("Pano Cap", "us" or "we" herein) may from time to time review and revise this policy. The revised policy will be effective and bind on you at the time it is posted on the Website.

We have incorporated security measures in order to protect the loss or misuse of the information provided to us. We take this commitment seriously. We will never willfully disclose individually identifiable information about our customers to any third party, except in the limited circumstances permitted by this policy or as required by applicable law. We do not sell, rent or loan any individually identifiable information regarding its customers to any third party.

All employees of Pano Cap understand that any information provided to us is to be held to ensure our customer's privacy.

1. Introduction

Pano Cap respects your privacy and is committed to protecting your personal information that you provide to us. Please note that, Pano Cap may review and update this Privacy Policy from time to time as needed without notice and will be effective and binding on you from the time that it is posted on the Website. It is therefore important that you review the terms of this policy periodically to make sure that you are aware of how Pano Cap collects and uses personal information. By using our Website, you consent to the collection and use of your personal information by Pano Cap as detailed herein.

2. Personal Information

What is "Personal Information"?

We consider "Personal Information" to mean any information that is voluntarily provided by the customer, including but not limited to name, address, and contact information, as well as all information request data and response data you provide to us through the Website.

Ultimately, the Personal Information you provide to the Website is at your discretion and under your control. Any Personal Information that you provide, we may collect. In general, you can visit our web site without providing us with any Personal Information. However, there are instances where we must have your Personal Information in order for us to grant you an access to our protected and secured sites.

When you receive your confirmation email or when you receive any email from the list server, you will be given instructions on how to remove yourself from the list.

Why do we collect Personal Information?

We intend to use Personal Information for purposes of supporting your and your employers relationship with Pano Cap and alerting you to new product and service offerings as they become available. This Personal Information may be retained by Pano Cap to verify compliance with the agreement between Pano Cap and your employer, to keep track of the domains from which people visit us, to create a user profile to better serve you and your employer, or to simply contact you either electronically or otherwise. If you decide that we should not use your Personal Information to contact you, please let us know and we will not use that information for such purpose.

We do not allow for the provision of Personal Information from those who are not of Canadian legal age (18 years and over) Do not submit any Personal Information if you are less than 18 years of age.

3. Consent

By providing Personal Information via the website, you agree and consent that we may collect, use and disclose your Personal Information in accordance with this Policy. In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

In most cases and subject to legal and contractual restrictions, you are free to refuse or withdraw your consent at any time. It should be noted that certain uses of the Website can only be utilized if you provide Personal Information. Consequently, if you choose not to provide us with any required Personal Information, we cannot continue to allow you to use all applicable components.

4. Disclosure of Personal Information

Pano Cap does not sell, trade or transfer Personal Information to third parties. We may disclose your Personal Information to any individual or organization in the following circumstances:

- (a) to any third party upon receipt of your consent;
- (b) to third parties who are our advisors or service providers;
- (c) to third parties who are, or may be involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or updating our systems and/or the Website;
- (d) to third parties in offering joint services to you;
- (e) to third parties in assisting us in monitoring the integrity of the Website; and
- (f) to third parties when required by applicable law.

Where we disclose Personal Information to third parties that perform services on our behalf, we will require those third parties to use such information solely for the purposes of providing services to us and to have appropriate safeguards for the protection of that Personal Information. You may separately agree to provide your Personal Information to third parties that provide content and/or offerings to our Website and/or users. If you agree to provide such information to these third parties, then your Personal Information will be subject to their privacy policies in addition to our own.

5. The Accuracy, Protection and Retention of Personal Information

The accuracy and security of the Personal Information is important to Pano Cap. Currently, you may review and request updates to your Personal Information retained by contacting Pano Cap at info@panocap.com. If you contact us to correct your Personal Information, we will attempt to correct such inaccuracies in a timely manner. Pano Cap is concerned with the security of your Personal Information and is committed to taking reasonable steps to protect it from unauthorized access and use of that Personal Information. To that end, we put in place the appropriate physical, electronic and managerial policies and procedures to secure your personal Personal Information. We also continue to implement procedures to maintain accurate, complete and current Personal Information.

Additionally, we keep your Personal Information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on its use and the nature of the information. This period may extend beyond the end of your relationship with us but it will be only for so long as is necessary.

6. Usernames and Passwords

Access to certain content on our Website may be allowed under a written agreement between you or your employer and Pano Cap and will require a username and/or password. In some cases, failure to provide Personal Information may prevent you from accessing certain sections of the Website containing certain confidential information, products, services, or promotional offers. By accessing and using our protected and secured Website, you agree to maintain the confidentiality of the username and password you selected to access such same.

7. Cookies

Pano Cap uses "cookies". A cookie is a small data file that a web site can transfer to a visitor's hard drive to keep records of the visits to such site. A cookie contains information such as your username and password that helps us recognize the pages you have visited and improve future visits, but the only Personal Information a cookie can contain is the information that you provide yourself. A

cookie cannot read data off of your hard drive or read cookie files created by other sites. Information stored in cookies may be encrypted. If you prefer not to accept a cookie, you can set your web browser (Microsoft Internet Explorer or Netscape Navigator) to warn you before accepting cookies or you can refuse all cookies by turning them off in your web browser. However, access to some of our secured web site(s) may require the use of cookies, which you must enable only cookies that get sent back to the originating server. Otherwise, you can still access most of the features on the Website even without accepting a cookie.

8. External Links

The Website provides links to other third party websites. Even if the third party is affiliated with Pano Cap, through a business partnership or otherwise, Pano Cap is not responsible for the privacy policies or practices or the content of such external links. We do not assume responsibility for the accuracy or appropriateness of the content contained on those websites and/or other applications. You enter those sites at your own risk. A link to the same should not be construed to mean that we are affiliated or associated in any way or that we endorse or recommend those websites and/or applications. These links are provided to you for convenience purposes only and you access them at your own risk.

9. Privacy Complaints

Pano Cap takes its users' privacy concerns seriously. If you believe that Pano Cap has not complied with this Privacy Policy with respect to your personal information, you may contact us at info@panocap.com.

This Privacy Policy is subject to all applicable Canadian laws and regulations.