

Seaboard International Shipping Company Limited

Privacy Policy

Our Privacy Policy is based on the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information* and Canada's *Personal Information Protection and Electronic Documents Act*.

Protecting Personal Information

A. Purpose: Seaboard International Shipping Company Limited ("Seaboard") is committed to maintaining the accuracy, confidentiality and security of your¹ personal information. We will ensure that our policies and operational guidelines, directed by the principles of the CSA Code govern the management of personal information of our members, customers and staff.

B. Scope: This policy will be applied to all personal information collected, used or disclosed, about an identifiable individual during the course of commercial activities. We will ensure that any third parties that have been approved, designated or contracted to act on our behalf are aware of and in compliance with the principles set forth in our Privacy Policy.

C. Definitions:

i) Personal Information – Information that can be used to identify, distinguish or contact a specific individual; including opinions, beliefs, financial information and other identifying data but does not include the name, title, business address or telephone number of an employee of an organization.

ii) Consent – Voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual.

D. The Privacy Principles: To guide us in protecting your privacy, Seaboard follows the following 10 principles, which are based on those created by the CSA and rooted in the Personal Information and Electronic Documents Act.

1) Accountability

Each member, employee or agent of Seaboard is responsible for personal information under his or her control. In order to ensure compliance of this Privacy Code, we have designated a Chief Privacy Officer responsible for the implementation of policies and procedures, and adherence to the following principles.

¹ In this document, *you* and *your* mean the individual who is a customer or potential customer of Seaboard International Shipping Company Limited, and *we*, *us* and *our* mean Seaboard International Shipping Company Limited, Seaboard Shipping Company Limited and their affiliates in Canada.

2) Identifying Purposes

The purposes for which personal information is collected shall be identified before or at the time the personal information is collected.

3) Consent

Individual's consent will be obtained for the collection, use or disclosure of personal information, except where the law provides an exemption.

4) Limiting Collection

The personal information we collect shall be limited only to that which is necessary for the purposes identified.

5) Limiting Use, Disclosure and Retention

Personal information will not be used, disclosed or retained for purposes other than those for which the information was collected, except with the permission of the individual, or as permitted or required by law.

6) Accuracy

We shall keep personal information as accurate, complete and up-to-date as may be necessary to fulfill the purposes for which it is to be used.

7) Safeguards

We shall protect personal information using security safeguards that are appropriate to the sensitivity level of the personal information received.

8) Openness

Seaboard will provide information to individuals about our policies and procedures relating to the management of personal information that is under our control.

9) Individual Access

On written request to our Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information that is under our control, and may be given access to that personal information as required and permitted by law. Individuals are entitled to challenge the accuracy and completeness of that personal information and request that it be amended, if appropriate.

10) Challenging Compliance

Seaboard will make every effort to respond openly to inquiries or complaints regarding our management, collection and disclosure of personal information. We will ensure that every complaint is investigated and that appropriate actions are taken to rectify the situation.

E. Contact Information: For more information, please contact Seaboard's Privacy Officer at 604-980-1113.