



PRIVACY CODE

This Privacy Code informs you of Aboriginal Impact Capital (AIC) commitment to and policy on privacy. It tells you the ways AIC ensures that your privacy and the confidentiality of your personal information are protected.

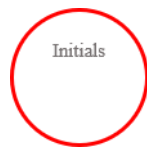
The objective of AIC’s Privacy Code is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Personal Information Protection and Electronic Documents Act (Canada) and other applicable privacy legislation.

AIC will conduct periodic reviews of this Privacy Code to make sure that it remains current with changing standards, technologies and laws.

We urge you to read this Privacy Code carefully and to check back periodically as this Privacy Code may change from time to time.

Table of Contents

1. Accountability - Privacy compliance with legal and industry standards	2
2. Purposes for the collection, use, retention and disclosure of information about you.....	2
3. Consent.....	3
4. Limiting Collection.....	3
5. Limiting Use, Disclosure and Retention.....	3
6. Accuracy.....	5
7. Protecting Information – Safeguards.....	5
8. Openness.....	5
9. Providing Information Access and Accuracy.....	5
10. Respecting and Responding to your Privacy Concerns/Challenging Compliance.....	6
Information Regarding Web Site Practices.....	7
Updating This Code.....	7
Consent and Acknowledgement.....	8



AIC'S PRIVACY CODE

AIC's Privacy Code applies to identifiable individuals whose personal information AIC collects, uses, retains and discloses in the course of commercial activities. AIC has developed this Privacy Code to provide information regarding AIC's approach to the management and control of personal information collected in the course of its business. When we use the term "personal information" we mean information about an identifiable individual. Personal information includes but is not limited to information about a person's age, name, identification numbers, income, ethnic origin, credit record, loan record, and similar information. Personal information does not, however, include a person's business contact information such as that person's name, title, business address, telephone number or e-mail address where that information is collected, used or disclosed solely for the purpose of communicating with that person in relation to their employment, business or profession. As well, personal information does not include information that does not identify a particular individual.

1. ACCOUNTABILITY - PRIVACY COMPLIANCE WITH LEGAL AND INDUSTRY STANDARDS

AIC will make every reasonable effort to comply with industry standards and applicable federal and provincial laws in Canada, including the *Personal Information Protection and Electronic Documents Act*. AIC is responsible for the protection of all personal information within its possession or control. AIC has designated an individual who is accountable for AIC's compliance with this privacy code. The individual designated to oversee AIC's compliance with this privacy code is: Alex Weeks

2. PURPOSES FOR THE COLLECTION, USE, RETENTION AND DISCLOSURE OF INFORMATION ABOUT YOU

AIC may collect, use, retain and disclose personal information for the following purposes:

- To establish and maintain a relationship with you as a client and to provide services to you;
- To provide you with information about products, programs, services, conferences, training resources and upcoming events that may interest you;
- To administer AIC's services; to assess the quality and quantity of AICs' services; to maintain adequate accounting and tax records; for performance measurement, statistical or evaluation, monitoring and auditing purposes; to provide financial reports and/or non-financial records for loan and financial assistance projects to AIC's funders; and to have information in such form as AIC may reasonably require for its business needs;
- To meet legal, regulatory and governmental requirements (including the requirements of: the Governments of Ontario; the Government of Canada; and the National Aboriginal Capital Corporations Association, which manages a devolved Government of Canada program, which are the funding sources of AIC), to detect and prevent fraud, and to protect the interests of you, AIC, the Government of Ontario, the Government of Canada, and the National Aboriginal Capital Corporations Association; and
- To identify to levels of government including the Métis Nation of Ontario, the Government of Ontario, and the Government of Canada, that your business is an Aboriginal owned and controlled enterprise for inclusion in an indigenous business registry.
- Credit Reporting
- To achieve any other purpose to which you have given your consent. For clients who have not obtained a loan or financial assistance from AIC, the above-noted purposes differ in that AIC is not required to maintain accounting and tax records related to such individuals. For loan or contribution clients, further details regarding AIC's purposes for the collection, use, retention and disclosure of personal information are outlined in your Loan or contribution Application Form with AIC.

3. CONSENT

The knowledge and consent of an individual are generally required for the collection, use or disclosure of personal information. AIC will seek to obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly or implicitly. Once consent is obtained from the individual to use his or her information for those purposes, AIC has the individual's implied consent to collect or receive any supplemental information that is necessary to fulfil the same purposes.

By signing the consent, which is attached to this Policy, express consent is granted by the individual to collect, use, retain and disclose information in accordance with this policy. Implied consent is also granted by the individual to permit AIC to report or otherwise disclose information to AIC's funders. An individual may withdraw consent on reasonable notice to AIC, if he or she has not obtained a loan or financial assistance from AIC, subject to legal or contractual restrictions and the requirement that AIC maintains the integrity of the statistics and data necessary to carry on its business. If an individual has obtained a loan or financial assistance from AIC, an individual cannot withdraw consent to the use, retention and disclosure of personal information and AIC may use, retain and disclose such information during such period as the loan or any part of it is outstanding and for such period thereafter as AIC is required to retain records pertaining to the loan in accordance with its obligation to AIC's funders.

Express consent may be obtained verbally, online, or in writing. Methods of providing express consent include, but are not limited to, paper or electronic application forms, orally over the telephone or in person, email, fax, personal delivery of written communication or by mail.

Implied consent may be obtained through your use of one of our products or services.

AIC may depart from this consent principle in accordance with the limited exceptions described in this Privacy Code, when permitted by other written and posted policies established by AIC, or where required or permitted by applicable laws (for instance, AIC may disclose personal information in an emergency to protect human life or safety).

4. LIMITING COLLECTION

AIC collects and uses information to establish and serve you as a client. AIC gathers and uses your personal information to provide you with the services you have requested. AIC collects, uses, retains and discloses information about you only with your consent, except as outlined in this Privacy Code. In obtaining your consent, whether express or implied, the purposes for which AIC requires your information are set out in this Privacy Policy and other referenced documents. If AIC's purposes differ from those set out, AIC will advise you of its new purposes at the time of collection of your information.

5. LIMITING USE, DISCLOSURE AND RETENTION

AIC's Privacy Code consists of the following key principles, which apply to all aspects of AIC's handling of an individual's personal information in the context of a commercial activity, including the collection, use, retention and disclosure of such information.

The information AIC collects depends on the service you have requested. For every client, AIC needs your contact information (your name, address and some identification).

Here is why AIC needs some of the other information it asks you to provide.

- Birth date - this helps AIC identify you and ensure that no one is trying to impersonate you.
- Social Insurance Number (SIN) - AIC uses your SIN to keep your information separate from that of other clients with a similar name. For loan or **contribution** applicants, AIC use your SIN to obtain information with your consent, through the credit approval process.
- For loan or contribution applicants, your financial information is used to assess your eligibility for a business loan or contribution.

- For loan applicants, AIC requires your health information to apply for group creditor life insurance, as an insurance company will not provide such coverage unless you are eligible based on your health information.

AIC will only ask for the information it needs for the particular service you have requested and will only use it for the purposes outlined in this Privacy Code or, if applicable, outlined to you at the time of collection of your information, such as in the case of a loan or contribution applicant. When you apply for a new service, AIC will indicate how it intends to use your information if its purposes differ from those already outlined. AIC will advise which information would help it to serve you but is optional for you to provide.

AIC may obtain information about you from third parties. Obtaining additional information about you from third parties helps AIC assess your eligibility for its loans, contributions and services. For example, for loan or contribution applicants AIC needs to know your credit history. For this reason, AIC may contact other lenders or credit bureaus to give it information on your credit history.

AIC may also contact employers or other personal references to verify information that you have given it. AIC will not do this without your consent, but please remember that if you do not give your consent AIC will not be able to process your loan or contribution application and extend credit services to you.

AIC does not sell client lists or information to others. AIC may release your information to outside parties under the following circumstances:

- Where AIC has your consent, whether express or implied. For example, for loan applicants, AIC will disclose your credit history with such other lenders or credit bureaus in order to support the credit approval process. In such cases, AIC will release the information required to identify you, as well as facts from its credit records about your repayment history.
- For business clients, AIC may disclose your contact information to the Government of Ontario and other related organizations, such as the devolved provider of the Government of Canada's Aboriginal Business Canada program or the Canada/Ontario Business Service Centre.
- To suppliers and agents who assist AIC in servicing you and whom AIC can reasonably trust to respect your privacy. For example, AIC will disclose your name and address to a courier company making a delivery to you. In such cases, AIC will only make disclosure to the extent necessary and whenever possible, require that the party receiving this information provides reasonable assurances that they will respect the privacy of your information in accordance with applicable laws.
- When required or permitted by law to do so. For example, AIC must give information in response to a valid demand, search warrant or other legally valid enquiry or order. AIC may disclose information to the authorities to serve a clear public interest and fulfill its public duty - such as to protect against fraud or other criminal activity. AIC may take action to protect its interests that may result in disclosing information to parties outside AIC, such as using agents to collect overdue accounts. AIC may also disclose information under an exception to the requirement for consent expressly set out in applicable laws, such as the exception for disclosures necessary to protect human life or safety in an emergency.
- When AIC needs to do so to protect its interests in the context of an existing or potential legal or administrative proceeding. For example, in the event of a proceeding commenced by or against AIC in connection with you, AIC may disclose your information to its lawyers and to the court or administrative body involved.
- When required by the Government of Ontario and/or Government of Canada, as a funder of AIC and the source of AIC investment funds. For example, AIC must prepare reports for distribution to the Government of Ontario in order to receive funding. Although the information contained in such reports is often de-identified data, such reports may contain personal information of loan or contribution applicants and other clients.
- When required by the National Aboriginal Capital Corporations Association (NACCA), as a funder of AIC and a source of AIC's operating funds. For example, AIC must prepare reports for distribution to NACCA in order to receive funding. Although the information contained in such reports is often de-identified data, such reports may contain personal information of loan or contribution applicants and other clients.

- AIC will share client information with third parties only to the extent necessary for the identified purpose. AIC will seek to ensure the third party returns or disposes of the transferred information upon completion of the relationship. AIC will seek to ensure the third party uses appropriate measures to protect the client's information. AIC may audit the third party's compliance with the required security measures as necessary.

6. ACCURACY

AIC will take all reasonable steps to ensure that all personal information will be kept accurate, complete and up-to-date. Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

AIC will make every reasonable effort to keep your information accurate and up-to-date.

Having accurate information about you enables AIC to give you the best possible service. You can help by keeping AIC informed of any changes, for instance if you move or change telephone numbers. If you find any errors in AIC's information about you, please send AIC the correction in writing by mail, fax or e-mail. AIC will make appropriate corrections and make sure that such corrections are conveyed to anyone it may have misinformed. For information that remains in dispute, AIC will note your opinion in its file.

7. PROTECTING INFORMATION – SAFEGUARDS

AIC will protect your information with appropriate safeguards and security measures.

AIC has reasonable security standards to protect its systems and your information against unauthorized access and use. All employees of AIC are familiar with the procedures that must be taken to safeguard client information.

The length of time AIC retains information varies depending on the service and the nature of the information. This period may extend beyond the end of your relationship with AIC but only for so long as it is legally or reasonably required by it. AIC retains information that has been used to make a decision about an individual for a period of seven years from the date of the decision to allow the individual to access his or her information after the decision has been made. When your information is no longer needed, AIC has procedures to destroy, delete, erase or convert it to an anonymous form.

8. OPENNESS

AIC will make its policies and practice relating to the protection of personal information available to individuals from whom it collects or about whom it collects personal information. AIC will keep those individuals informed of its policies and practices and such individuals shall be provided to access to all related policies and procedures via AIC's web page.

9. PROVIDING INFORMATION ACCESS AND ACCURACY

AIC will give you access to the information it has about you upon your request. Most of your information is kept in AIC's client file about you. Please contact AIC if you wish to access any information AIC may have about you. AIC will advise you in advance if a minimal charge will be required for conducting a search and will attempt to respond to your request within 30 days. Please note that AIC may not be able to provide information about you from its records if it contains references to other persons, is subject to legal privilege, contains information proprietary to AIC, is too costly to retrieve, or cannot be disclosed for other legal reasons.

10. RESPECTING AND RESPONDING TO YOUR PRIVACY CONCERNS/CHALLENGING COMPLIANCE

AIC will explain your options of refusing or withdrawing consent to the collection, use or disclosure of your information, and will record and respect your choices subject to any legal or contractual restrictions and reasonable notice.

Please contact AIC and ask to speak to AIC's Privacy Officer if you have any questions related to your options. For example, you may refuse consent for AIC to do a credit check, but if you do so, AIC will not be able to extend credit services to you. Once you have a credit product, you will not be able to withdraw your consent to share your credit experience with other lenders and credit bureaus, as this is necessary to support the credit approval process.

AIC will investigate and respond to your concerns about any aspect of its handling of your information.

If you have any concerns or questions about privacy and confidentiality - or any concerns about the way a request for information was handled - you can take the following action. Contact AIC and ask to speak to its Privacy Officer. Email info@aiccap.ca to request contact information for AIC's Privacy Officer.

The Privacy Officer appointed for AIC has the decision-making authority to resolve most concerns. However, if you are unsatisfied with the way your complaint or request was addressed, you may contact the Federal Privacy Commissioner at:

Office of the Privacy Commissioner 112
Kent Street
Ottawa, Ontario K1A 1H3

INFORMATION REGARDING WEB SITE PRACTICES

The principles outlined in this Privacy Code apply to information collected through AIC's Web site, with the following qualifications:

- AIC collects and stores your e-mail address from any communications that you may send to it by clicking on any of its e-mail links. AIC may use your e-mail address to communicate with you if: you are registering for a program, conference, training resource or event; your e-mail indicates that a response to your inquiry is requested; or if AIC wishes to address a concern or complaint you may have.
- AIC may use a browser feature which is known as a "cookie" to collect information that is not personally identifiable (this may include the type of browser you use, the domain name of the website from which you came, number of visits, and time spent on our website). In addition to the identified purposes in this Code, we may use this information and share it with our affiliates and other organizations that we have a commercial relationship with to measure the use of our websites and to improve the functionality and content of the websites. If you prefer not to accept cookies, you may adjust your browser settings accordingly, but you may have limited access to our website features.
- Links to external sites are provided for you as a convenience and no responsibility or liability is assumed in respect of such linked sites. These other sites may send their own cookies to users collect data or solicit personal information. You should check the privacy policy of any site you visit for information regarding their privacy handling practices.

UPDATING THIS CODE

Any changes to this Privacy Code or to AIC's information handling practices will be recorded in a timely manner.

We may add, modify or remove portions of this Privacy Code when we feel it is appropriate to do so. However, AIC will not use any information collected prior to such changes for any new purposes without first obtaining your consent.

CONSENT AND ACKNOWLEDGMENT

I agree to the collection, use and disclosure of such personal information for the identified purposes in accordance with this Code and as permitted or required by law.

I agree that AIC may obtain and exchange such personal information (including among other things, credit experience, financial information and any credit check information) as may be required by AIC in connection with my loan or contribution application or my loan or contribution administration. Sharing of this personal information may include sharing it with other financing institutions that may participate in my financing.

I agree and authorize AIC to, from time to time, conduct a credit bureau or reporting agency search, a personal property registry search and any other searches required to assess my credit history or financial position. If my loan is granted, I agree and authorize AIC to assess my compliance with the terms of my loan and to assess the loan security for purposes related to enforcing the terms of my loan or to realize upon the loan security in the event of my default of the terms of my loan. I agree and authorize any other financing institution that may be evaluating the possibility of participating in my financing.

I agree that I cannot revoke this authorization until all of my debts and liabilities, present or future, direct or indirect, absolute or contingent, matured or not, or at any time owing to AIC have been paid in full. I can terminate consent only if my personal information is no longer reasonably required by AIC. Any termination of consent will not prevent AIC from storing personal information for the period specified in this Agreement, or for using the information for the purposes specified in the Privacy Code and without limiting the generality of that, specifically:

- Where AIC has reasonable grounds to believe the information could be useful when investigating a contravention of any law and the information is required for that investigation;
- An emergency exists that threatens an individual's life, health or security;
- The information is publicly available through no fault of AIC;
- The information is for statistical study or research;
- The information is required to investigate a breach of an agreement with AIC or to enforce an agreement with AIC, or for AIC's reporting purposes to its funders;
- The information is for statistical study, research or reporting.

I understand and agree that AIC may disclose personal information without my knowledge or consent if the disclosure is for the purpose of collecting a debt owed by me to AIC.

Subject to the limitations above, I understand that I can revoke any portion of this consent agreement by providing written notice to AIC. If I refuse or withdraw my consent I acknowledge that AIC may not be able to provide me or continue to provide me with their services.

To the extent that I provide AIC with the personal information of another individual, I represent that I have the authority and/or have obtained all required consents from such individual to enable you to collect, use and disclose such personal information for the purposes described in this Privacy Code.

I agree and understand that this is a continuing consent with no expiry date and that if I do not provide a written revocation of consent then consent as outlined in this agreement is implied and authorized.

I understand and agree to all of the terms and conditions of this Privacy Code.

DATED in the Province of Ontario, this ____ day of _____,

Name: _____

Signature: _____

Name: _____

Signature: _____

Name: _____

Signature: _____

