



Postmedia Network Canada Corp.

PRIVACY POLICY

Date of original issue: June 10, 2011

INTRODUCTION

Postmedia Network Canada Corp. and its affiliated and subsidiary entities, are committed to controlling the collection, use and disclosure of personal information of their customers and employees and have adopted this Privacy Policy to ensure the accuracy, confidentiality and integrity of such personal information.

APPLICATION

3.5 The way in which a Postmedia Network Company seeks consent may vary, depending on the circumstances and the type of information collected. A Postmedia Network Company will generally seek express consent when the information is likely to be considered sensitive. It will rely on implied consent only where collection and use of the personal information is directly related to a transaction or exchange of information in which the individual is directly participating. Consent may also be given by an authorized representative (such as a legal guardian or a person having power of attorney).

3.6 Consent may be obtained in any one of the following ways:

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- to third party service providers for the purposes of administering payroll and benefits programs;
- to union representatives and labour arbitrators;
- to other Postmedia Network Companies;
- to internal or external legal counsel and auditors;
- to the Privacy Officers;
- to the management personnel of each Postmedia Network Company;
- in the context of providing references regarding current or former employees in response to requests from prospective employers and/or financial institutions;
- to prospective parties in the context of a transactional due diligence review; and
- where disclosure is required by law.

5.3 A Postmedia Network Company may disclose the personal information of its **customers**:

- to third party service providers, including newspaper distributors and carriers;
- to other Postmedia Network Companies;
- to internal or external legal counsel and auditors;
- to the Privacy Officers;
- to the management personnel of each Postmedia Network Company;
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6.1 Personal information used by the Postmedia Network Companies shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about the individual customer or employee. The extent to which personal information will be accurate, complete and up-to-

advise the individual of the right to make a complaint to the Privacy Commissioner about the extension. They will provide the requested information or make it available in a form that is generally understandable.

9.6 The Postmedia Network Companies shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to the accuracy or completeness shall be noted in the individual's file. Where appropriate, the Postmedia Network Companies shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.7 A customer can obtain information, seek access to his or her individual file or withdraw consent by contacting the applicable Privacy Officer. An employee can obtain information, seek access to his or her individual file or withdraw consent by contacting the applicable Privacy Officer.

PRINCIPLE 10 - CHALLENGING COMPLIANCE

An individual customer or employee shall be able to address a challenge concerning compliance with the