



Privacy Statement

Austco Healthcare Limited (formerly Azure Healthcare Limited). ("The Company") is committed to maintaining the accuracy, confidentiality, and security of your personal information. As part of this commitment, the following Ten Privacy Principles govern our actions as they relate to the use of customer 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 Customer Information
- Principle 8 – Openness
- Principle 9 – Customer Access
- Principle 10 – Handling Customer Complaints and Suggestions

Principle 1 – Accountability

Austco Healthcare is responsible for maintaining and protecting the personal information under its control. Austco Healthcare has designated an individual or individuals who is/are accountable for compliance with the Ten Privacy Principles.

Principle 2 – Identifying Purposes

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

Principle 3 – Consent

Knowledge and consent are required for the collection, use or disclosure of personal information except where required or permitted by law.

Principle 4 – Limiting Collection

The personal information collected must be limited to those details necessary for the purposes identified by The Company.

Principle 5 – Limiting Use, Disclosure and Retention

Personal information may only be used or disclosed for the purpose for which it was collected unless you have otherwise consented, or when it is required or permitted by law. Personal information may only be retained for the period of time required to fulfill the purpose for which it was collected or as required by law.

Principle 6 – Accuracy

Personal information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 – Safeguarding Customer Information

Personal information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 – Openness

Austco Healthcare will make information available to our customers concerning the policies and practices that apply to the management of their personal information.

Principle 9 – Customer Access

Upon request, a customer shall be informed of the existence, use and disclosure of their personal information, and shall be given access to it. Customers may verify the accuracy and completeness of their personal information, and may request that it be amended, if appropriate.

Principle 10 – Handling Customer Complaints and Suggestions

Customers may direct any questions or enquiries with respect to the privacy principles outlined above or about our practices by contacting: Privacy Officer Austco Healthcare Ltd. Before Austco Healthcare is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavor to respond within an appropriate timeframe. If you have questions or concerns regarding our organization's privacy policy and practices, you should first contact Austco Healthcare directly. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact the Privacy Commissioner's Office at <http://www.privcom.gc.ca> (or 112 Kent Street, Ottawa, Ontario, K1A 1H3), who will then serve as a liaison with Austco Healthcare to resolve your concerns.

What Information is Collected?

At The Company, we gather and use personal information to provide you with the merchant services you have requested and to offer you additional products and services we believe you might be interested in. Providing us with your personal information is always your choice. Most of the information we collect comes to

us directly from you, and only with your consent. For example, when you request products or enrol for a service by telephone, online, or in person, we will ask you to provide the information that enables us to complete your request or to provide you with better service. The types of personal information we may ask for depends on the nature of your request. Personal information that is essential for completing an application or credit application for merchant services typically includes name, home address, home telephone number, title, social insurance number, date of birth and bankruptcy history of the individual(s) entering into the merchant agreement and other owners, partners, officers or directors of the merchant. We may also request additional information to help us contact you, provide you with advice about our services and information about other products and services that we believe would interest you.

When you visit Austco Healthcare's web site, information is not collected that could identify you personally unless you choose to provide it voluntarily. You are welcome to browse the Web site at any time anonymously and privately without revealing any personal or financial information about yourself. For purposes of maintaining quality service, calls to our customer service lines may be recorded. A recorded message given prior to your call being answered will let you know if your call may be the subject of our random call recording quality assurance program.

Types of Information We Collect

The type of information you will be asked to provide will vary according to your activity or request.

- Applying for merchant services
- Applying for other products and services
- Customer service
- Changing your merchant services
- Browsing Azure Healthcare web site
- Personal Information

Personal information is information that refers to you specifically. With your consent, we may gather personal information from you in person, over the telephone or by corresponding with you via mail, facsimile, the Internet, or from referrals by third parties such as your financial institution. The type of information we usually collect and maintain in your customer file may include your:

- Name/ Business Name
- Title
- Mailing Address
- Location Addresses
- E-mail Address
- Web Address
- Telephone Number
- Signing Officers Information, including name, title, home mailing address, home phone number and date of birth)

- Social Insurance Number
- Credit History
- Name(s) of Owner(s), Officer(s) and Director(s)
- Business Activity
- Industry Type
- Financial Status
- Financial Institution Information

The choice to provide us with personal information is always yours. However, your decision to withhold particular details may limit our ability to provide you with merchant services. If we are unable to accommodate your request based on the information that has been provided to us, we may ask for additional details in order to identify other ways to be of assistance. In some instances, Austco Healthcare may also maintain a file containing contact history that is used for customer inquiry purposes.

Anonymous/Non-Personal Information

At The Company, we routinely collect anonymous/non-personal information. Anonymous/non-personal information is information that we do not associate with or trace back to a specific individual or business entity. For example, our web servers collect some anonymous/non-personal information automatically when you visit Austco Healthcare web site. Gathered electronically, this information may include the pages you visited, the type of web browser you are using, the level of encryption your browser supports and your Internet Protocol address. The anonymous/non-personal information collected may be used for research and analytical purposes and occasionally for security investigations. To help us better understand our markets, we may also gather information for analytical purposes by conducting customer surveys, and by extracting demographic information from existing files.

How Your Information is Used

- We use personal information to communicate with you, process applications and ultimately to provide you with the services you have requested.
- We use anonymous/non-personal information to improve our products and services.

Personal Information

We use your personal information to communicate with you, process applications and effectively provide the services you have requested. We use the personal information you have provided to us to communicate with you and safeguard your interests. We will keep you informed about your merchant account activities, send you important notices, and respond to any special needs or enquiries you may have. With your consent, we may also send you information about other products and services in which we believe you may be interested. We only use personal information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent

before we proceed.

Anonymous/Non-Personal Information

The anonymous/non-personal information gathered from Austco Healthcare web site is used primarily for technical, research and analytical purposes like evaluating the various sections of the web site. This information does not include any personal information and it is only retained until its intended purpose is fulfilled. It is our goal to continuously improve our service offerings to you. Therefore, we use anonymous/non-personal information collected from surveys, from public archives and by extracting information from existing files to better understand our customers' interests, priorities, and satisfaction levels

When Information May be Disclosed to Outside Parties

We are obliged to keep your personal information confidential except under the following special circumstances:

- When authorized by you
- When required by law
- When permitted by law
- When Authorized by You

Our merchant agreement and related agreements outline the terms and conditions associated with services provided by us. In general, they establish the rights and obligations of the parties as they relate to the provision of our services. With respect to the matter of privacy, the merchant agreement authorizes us to use the personal information to respond to any application for our services and to provide our services to you, as well as in the following ways:

- to determine your financial situation by collecting credit and related financial information from our affiliates, strategic partners, credit agencies, other financial institutions and from references provided by you;
- to facilitate the provision of our services by sharing your information with our third party service providers, credit agencies and similar parties;
- to investigate potentially fraudulent or questionable activities regarding your merchant account(s) or the use of our services;
- to offer you related products and services that might benefit you; and

in the course of an actual or potential sale, reorganization, consolidation, merger or amalgamation of our business. In addition we may also collect, use and disclose personal information when required or permitted by law. In some cases, such as when you apply for merchant services over the telephone, your consent to the use and/or disclosure of your information will be obtained verbally. In other cases, your consent may be obtained in writing or electronically, such as through the completion of a credit application.

When Required by Law

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

When Permitted by Law

There are some situations where we are legally permitted to disclose personal information such as employing reasonable and legal methods to enforce our rights under our merchant agreement, to collect a delinquent account or investigate suspicion of illegal activities.

With Whom We May Share Your Information

With your consent we will share information with suppliers who perform services on our behalf. Unless you authorize us to release it, or release is required or permitted by law, we never sell, lease or trade information about you or your accounts to other parties.

Our Employees: In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it. For example, when you call us, our designated employees will access your information to verify who you are and to assist you in fulfilling your requests. As a condition of their employment, all employees of Austco Healthcare are required to abide by the Privacy Policy we have established. They are also required to work within the principles of ethical behaviour as set out in our Corporate Policy Manual and must follow all applicable laws and regulations. Employees are informed about the importance of privacy and they are required to agree to a policy of conduct that prohibits the disclosure of any customer information to unauthorized individuals or parties. Unauthorized access to and/or disclosure of customer information by an employee of Azure Healthcare is strictly prohibited. All employees are expected to maintain the confidentiality of customer information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

Outside Service Suppliers: At Austco Healthcare, we sometimes contract outside organizations to perform specialized services such as repair work. Our trusted service suppliers may at times be responsible for processing and handling some of the information we receive from you. When we contract our suppliers to provide specialized services, they are given only the information necessary to perform those services. Additionally, they are prohibited from storing, analyzing or using that information for purposes other than to carry out the service they have been contracted to provide. In fact, our suppliers are bound by strict contractual obligations that have been designed to protect the privacy and security of your information. Furthermore, as part of our contract agreements, our suppliers and their

employees are required to protect your information in a manner that is consistent with the privacy policies and practices that we have established.

How We Safeguard Your Information: We use state-of-the-art technologies and maintain current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. All safety and security measures are also appropriate to the sensitivity level of your information.

Customer Files: Electronic customer files are kept in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets. Access is also restricted.

Online Security: We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised. Austco Healthcare web site uses Secure Socket Layer (SSL) and 128 bit encryption technologies to enhance security when you visit the secured areas of these sites. SSL is the industry standard tool for protecting and maintaining the security of message transmissions over the Internet. When you access your accounts or send information from secured sites, encryption will scramble your data into an unreadable format to inhibit unauthorized access by others. To safeguard against unauthorized access to your accounts, you are required to "sign-on" using a user id and a password to certain secured areas of Austco Healthcare web site. Both user id and password are encrypted when sent over the Internet. If you are unable to provide the correct password, you will not be able to access these sections. When you call our customer service centre you will be required to verify your identity by providing some personally identifying information as well as your merchant number.

How You Can Protect Your Information

We do our utmost to protect and safeguard your personal and financial information. We believe there are measures you should take as well. The following is a list of things you can do to protect yourself against fraud and uninvited intrusion.

Passwords

Passwords are necessary to identify you and authenticate your permission to access your merchant accounts online. The passwords you use are encrypted. Encryption is presently the most effective way to achieve data security. Just as it is important for us to employ strict procedures to safeguard your information, you also should take precautions in handling your passwords. When selecting a password, we suggest that you use a combination of letters and numbers and do not use words that can be easily associated with you such as the name of a family member, a pet or the street on which you live. We also suggest that you change your password regularly.

Personal Information

You should not share personal information with others unless you clearly understand the purpose of their request and you know who you are dealing with.

Your Online Security

To make sure your connection to the protected areas of Austco Healthcare web site is secure, look for either a 'closed lock' or an 'unbroken key' icon located at the bottom right hand side of your browser's task bar. You may also check the Address bar to determine if SSL (Secure Socket Layer) is active by looking at the beginning of the address. If it starts with "https" rather than the standard "http", then SSL is operating.

Accessing and Amending Your Information

At The Company, decisions are made based on the information we have. Therefore, it is important that your personal information is accurate and complete. As a customer, you have the right to access, verify and amend the information held in your personal and financial files.

Accessing Your Information

You may access and verify any of your information by calling our customer service centre at 416-932-2080.

Amending Your Information

To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file(s), we will make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

To Make a Change

To make a change to the personal contact information contained in your file, you may do so using our contact page to request a change in your personal contact information. In each case, you will be required to verify your identity by providing some personally identifying information.

What is a Cookie?

A cookie is a small text file containing a unique identification number that a web site sends to your computer's web browser. While you visit a particular site, a cookie may be used to track the activities of your browser as well as provide you with a consistent, more efficient experience. There are two common types of cookies: persistent and non-persistent. Persistent cookies are stored on your computer's

hard drive where they remain resident until they are either deleted or they reach a predetermined expiration date. Persistent cookies are most commonly used to provide visitors with a customized experience by recording preferences such as how a visitor prefers to have web pages displayed. Additionally, cookies are commonly used to gather statistical information such as the average time spent on a particular page. This kind of information is valuable for several reasons, including providing insight on how to improve the design, content and navigation of a web site. Non-persistent cookies do not permanently record data and they are not stored on your computer's hard drive. Rather, non-persistent cookies are stored in memory and are only available during an active session. Once a session ends, the cookie disappears. Non-persistent cookies are used primarily for technical reasons such as providing seamless navigation.

Why Were Cookies Created?

The world wide web uses the Hypertext Transfer Protocol (HTTP) to govern how files such as graphics, text and sound are exchanged over the Internet. This protocol treats every action (e.g. mouse click) independently making the nature of the web 'stateless'. This means that every time you click on a new page for instance, a new connection is established and all previous activity is forgotten. To provide visitors with a more uniform experience, cookies were used originally to maintain relevant information as visitors viewed various pages of a web site. In effect, cookies were created to bring state and consistency to the 'stateless' environment of the web.

How Do Cookies Work?

The first time you visit a web site, you may be sent a cookie that contains a unique identification number that can be easily retrieved during future visits. Cookies are used for different purposes such as remembering how you want a home page to look. When you type the web site address in the address bar of your browser, your browser will contact the site you've entered and request its home page. The browser will search your hard drive for a cookie that may have been sent during a previous visit. If a cookie is found, the browser will send any information gathered from a previous visit to the web server. If a cookie is not found, then the browser will know you have not visited the site before. On Austco Healthcare web site, cookies are used to increase robustness and to provide more efficient navigation. Cookies cannot view or retrieve data from other cookies, nor can they capture files and data stored on your computer.

How Cookies are Used

Cookies may be used by Azure Healthcare web site to improve functionality and in some cases, to provide visitors with a customized online experience.

To Improve Functionality

Non-persistent cookies may be used to improve operations and functionality. For example, cookies improve navigation, maintain connectivity and ensure online

service sessions are secured. They do not contain personal information and they are not permanently stored for future use.

Site Personalization

Persistent cookies may be used as a means of offering visitors a personalized experience.

How Cookies are not Used

Although cookies have the capability of accomplishing a variety of undertakings, Austco Healthcare only uses cookies when they provide an obvious benefit to you. The following describes how we do not use cookies.

Web Site Tracking (What sites you go to)

Cookies or other information tracking technologies are not used to follow the surfing behaviour of visitors once they leave Austco Healthcare web site. Additionally, tracking information that may be gathered during a visit to Austco Healthcare web site will not be used for promotional purposes.

User IDs and Passwords

For added security, cookies are not used to remember usernames and passwords when accessing highly secured pages on The Company' Merchant Direct site. You will be required to provide this information each time you log-onto a secure online service page.

Aggregated Analysis Attributable to an Individual Account

Austco Healthcare does not associate any of the information collected via cookies with your personal information.

Maintaining Personal Information in a Cookie

Cookies cannot be used to gather sensitive information about you or data residing on your computer. These cookies are not designed to identify you personally; rather they are intended to enhance navigation of your session.

What are Your Choices in Relation to Cookies?

If you would like to browse Austco Healthcare web site, you may do so without accepting cookies. However, you should understand that if you choose not to accept cookies, some areas of Austco Healthcare web site may not function properly or optimally. Cookies are widely used and most web browsers are configured initially to accept cookies automatically. If you prefer not to accept cookies, you may adjust your browser settings to alert you when a cookie is about to be sent, or you may configure your browser to refuse cookies automatically. If you would like to

learn more about how to set your cookie options, please refer to your browser's documentation or online help for instructions.

Questions, Concerns and Complaints

If you have a question about the privacy policies, please call us at 416-932-2080. If you have a concern or complaint about privacy, confidentiality or the personal information handling practices of The Company, our employees or service suppliers, please contact: Privacy Officer Austco Healthcare Ltd. Before Austco Healthcare is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavor to respond within an appropriate timeframe. If you have questions or concerns regarding our organization's privacy policy and practices, you should first contact Austco Healthcare directly. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact the Privacy Commissioner's Office at <http://www.privcom.gc.ca> (or 112 Kent Street, Ottawa, Ontario, K1A 1H3), who will then serve as a liaison with Austco Healthcare to resolve your concerns.

Updating this Privacy Policy

Any changes to our privacy policy and information handling practices will be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the bottom of this privacy policy.

Web Sites Governed by this Privacy Policy

The web sites that is governed by the provisions and practices stated in this privacy policy are: www.AzureHealthcare.com.au and www.Austco.com.

Other Web Sites

Austco Healthcare web site may contain links to other third party sites that are not governed by this privacy policy. Although we endeavor to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave Austco Healthcare web site. Additionally, we are not responsible for the privacy practices employed by other third party web sites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.