

DREAMFLEET INC.
("Dreamfleet")

PRIVACY POLICY

Introduction

Personal information means information about an identifiable individual. This Privacy Policy addresses and explains Dreamfleet's ongoing commitment to respect and protect the privacy and confidentiality of your personal information in our possession. We want you to know why we need your personal information, how this information is collected, how we protect this information and how it is disclosed.

Dreamfleet is committed to complying with applicable privacy laws in Canada, including the *Personal Information Protection and Electronic Documents Act*.

Openness and Accountability

Dreamfleet is responsible for your personal information that is within our control and each of our employees are responsible for the personal information within his or her control. Our employees are informed about the importance of privacy and receive information periodically to inform them of our Privacy Policy. We have appointed a Chief Privacy Officer who is accountable for our compliance with applicable privacy laws in Canada and this Privacy Policy.

For further information about this Privacy Policy, to address any concerns you have, to review or verify your personal information in our control or to find out how we have used it or to whom we have disclosed it, please contact us in writing at the following address:

Dreamfleet Ltd.
28 Marchvale Drive
Ottawa, Ontario
K2W 1C2

Attention: Chief Privacy Officer

We will give you access to the personal information we retain about you within a reasonable period of time. In some cases, we may not provide access to personal information within our possession or control. If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

We will investigate and respond to your concerns or complaints about our handling of your personal information and/or compliance with applicable privacy laws of Canada or this Privacy Policy. If the issue is not resolved to your satisfaction, we will provide information on other complaint procedures that may be available to you.

If there will be any cost to you of processing your request we will give you notice in advance of such cost.

Purposes for Collecting Personal Information

Whenever Dreamfleet collects personal information about you, we will explain the purposes for which we intend to use it either before or at the time the information is collected. We collect personal information

about you from you directly and from credit reporting agencies, driver and vehicle licensing agencies, insurance agencies, credit card agencies and financial institutions. Personal information is only collected by fair and lawful means and we do not use techniques to collect information about you without your knowledge. The type of product or service will determine what kind of information we collect and may include, without limitation to, your name, email address, home or business address and telephone numbers, your date of birth, credit and creditworthiness information, banking and credit card account information, vehicle insurance, and information relating to your driver's license and driving record. We may also record information regarding your vehicle preferences and choices, vehicle usage such as mileage and dates, insurance arrangements and payment arrangements.

We collect personal information for use and disclosure for the purposes of:

- establishing and maintaining communications with you;
- understanding your needs;
- determining if our products and services, or those of our partners, meet your needs;
- recommending, offering and providing our products and services, or those of our partners, that meet your needs or may be of interest to you;
- providing updates in the form of emails or mailings;
- compiling and analyzing in aggregate, vehicle usage, preferences, opinions, and experiences for market research purposes and uses;
- to check credit worthiness and driving records;
- collecting monies owing to Dreamfleet or permitting Dreamfleet to pursue available remedies or limit any damages it may sustain;
- complying with all applicable laws.

The collection of personal information by Dreamfleet is limited to that which is necessary for these purposes, or other purposes that are disclosed to you before or at the time the personal information is collected. Unless required by law, we will obtain your consent before using or disclosing your personal information for a purpose not previously identified.

Consent

Your consent can be express or implied. Express consent can be verbal or written. Implied consent arises when we can reasonably conclude that you have given consent by your action or inaction. Before deciding what form of consent is appropriate, Dreamfleet will consider the type of personal information we need, the reason for its use or disclosure and the type of client contact that is involved.

The choice to provide Dreamfleet with personal information is always yours. You can withdraw your consent at any time after you have given it to us, provided there are no legal requirements that prevent this. If you do not consent to a certain use or disclosure of information, or if you withdraw your consent, we may not be able to provide you with a particular product or service. If so, we will explain the consequences of refusing or withdrawing consent, and your options.

Use, Disclosure and Retention of Personal Information

Dreamfleet uses and discloses various types of personal information as necessary and appropriate for the purposes outlined above. The disclosure of personal information may occur as part of Dreamfleet fulfilling its obligations and/or conducting its business in the ordinary course. This includes, without limitation to, disclosure:

- to third parties, including, without limitation, the Ontario Motor Vehicle Industry Council (OMVIC), for the purpose of auditing DreamFleet company records and compliance to industry regulations;
- to our membership and third parties, information in aggregate that has been collected for market research purposes;
- to our program partners;
- to your company or organization if you use our services under a corporate or commercial account;
- to third parties that provide products or services to Dreamfleet, including, without limitation to, data processors, consultants, suppliers, lawyers, accountants, bankers, insurers, manufacturers and dealers, but only to the extent necessary to allow them to provide products or services to Dreamfleet
- with affiliated companies of Dreamfleet;
- to government agencies or regulatory bodies having jurisdiction to the extent they have which can oblige us to do so;
- to all others persons authorized or required by law;
- in emergency situations in which the life, health or security of an individual is in danger;
- to your credit card issuer;
- to credit grantors and reporting agencies;
- to debt collection agencies if you fail to pay monies owed to use;
- to a person who, in the reasonable judgment of Dreamfleet, is seeking information as your agent; or
- other persons, where you consent to such disclosure.

Personal information may be subject to transfer to another organization or person in the event of a merger or change of ownership of all or part of Dreamfleet, but this will only occur if the parties have entered into an agreement under which the collection, use and disclosure of the information is restricted to the purposes that relate to the business transaction, including a determination of whether to proceed with the business transaction.

Under no circumstances do we sell member lists to third parties.

Your personal information shall only be retained by Dreamfleet for as long as is necessary for the fulfillment of the identified purposes. Some personal information may be kept indefinitely.

Accuracy of Information

Dreamfleet endeavours to maintain personal information that is as accurate, complete and up-to-date as is necessary for the purposes for which it is used and disclosed. We rely on individuals to disclose all material information and to inform us on any relevant changes. If you have any reason to believe your personal information in our control is inaccurate, please contact us in writing. We will investigate and, where appropriate, update our records accordingly.

Security and Safeguards

Your personal information is secure with Dreamfleet and we use safeguards and security measures that are appropriate to the sensitivity of the information to protect against non-authorized access, use, alteration, duplication, destruction or disclosure of your personal information.

Dreamfleet maintains personal information in a combination of paper and electronic formats. While recent paper records are kept at our offices, older records containing personal information may be stored at offsite storage facilities.

Our computer systems are constructed in such a way as to ensure that only authorized individuals can access secure systems and databases. If you send us an e-mail message containing personal information, please remember that e-mail is not necessarily secure against interception.

Website and Privacy

When an individual visitor accesses Dreamfleet's website, we may use a browser feature called a 'cookie' to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor, to our computers each time our website is visited. Unless a visitor specifically informs us (e.g. by registering or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in this Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.

In order to provide our website visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, participating in a seminar or other event, and participating in contests and surveys. We may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected.

Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the products and services of Dreamfleet and other third parties with whom we have a relationship. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from Dreamfleet.

Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Dreamfleet and Dreamfleet has no responsibility for such third party websites.

Amendments to Our Privacy Policy

We may add, modify or remove portions of this Privacy Policy at any time when we feel it is appropriate to do so.