

**TRAVEL COUNSELLORS (CANADA) LTD.
PRIVACY POLICY**

This Privacy Policy applies to:

- Travel Counsellors (Canada) Ltd.,
- all of its employees, contractors, agents and other representatives ("Salespeople"),
- its affiliated companies and their Salespeople,
- its website www.travelcounsellors.ca ("Website"), and
- any other website(s) or program(s) that it may now, or in the future, operate.

Together, the above are referred to in this Privacy Policy as the "Company".

This Privacy Policy relates to the "Personal Information" of consumers who deal with the Company, directly or indirectly. "Personal Information" is information about an identifiable individual, other than the name, title or business address or telephone number of anyone employed by a customer of the Company, or data that is otherwise publicly available in conjunction with the use to which it is put.

The Company is committed to the on-going protection of your privacy, and the confidentiality of your Personal Information, while at the same time using your Personal Information for your benefit and in the manner you expect. Accordingly, its Privacy Policy:

- complies with the Personal Information Protection and Electronic Documents Act of Canada ("the Act"), provincial legislation (where applicable) that is substantially similar to the Act, and the Canadian Standards Association's Model Code for the Protection of Personal Information ("the Code"),
- evidences the Company's commitment to keep secure your Personal Information,
- confirms that the Company does not sell, barter, trade or rent your Personal Information.

Originally, the Code identified ten governing principles relating to privacy rights. All ten were adopted by the Act. By addressing each of them in turn, the Company will outline in detail the procedures it has adopted as part of its Privacy Policy.

1. Accountability

The Company is responsible for the Personal Information that it collects, directly or indirectly, from a consumer. To oversee its accountability, the Company has appointed a Privacy Officer, who can be contacted at:

- privacy@travelcounsellors.ca and/or
- #501 - 15 Toronto Street, Toronto, Ontario, M5C 2E3.

Communicating with the Company via insecure means of communication is done at your own risk. Neither is the Company responsible for the privacy practices of any websites to which its Website may be connected by hyperlink.

2. Purpose for Collection

The Company regularly receives Personal Information from its Salespeople. It is used for:

- a) processing your request for specific travel services and products,
- b) informing you about products and services that the Company believes may be of interest to you,
- c) understanding your needs,
- d) analyzing business results,
- e) administering consumer-focussed contests and surveys, in the course of which certain Personal Information is handled by third party suppliers,
- f) any commercial component arising from the above, and
- g) acting as required or authorized by law.

In addition, the Company receives Personal Information from its Website. Some of it is voluntarily provided. Some of it is based on "cookies" that are common in Internet usage. Normally, you can visit our website without providing Personal Information, and you are encouraged to do so. However, you may be asked to submit Personal Information in order to access some aspects of the Website. By providing it, you are consenting to our use of it.

When visiting our Website, you automatically leave anonymous information about your visit (e.g. time of day, length of visit, pages viewed, etc.). This information does not involve Personal Information. It is used, usually after being aggregated, in order to improve the Website. In the process, some of it may be shared with suppliers and others.

By placing a "cookie" on your hard drive, the Company can also track the web pages that are visited. The "persistent" cookie is transferred to your browser by a Web server, and can be read only by the server that originally provided it. Cookies do not reveal Personal Information, nor can they read data from your hard drive. The only information they contain is that which you provide.

Cookies can be deleted by you, at your computer, or upon their time-based expiry. "Non-persistent" cookies expire automatically when you finish your session at the Website. You are able to visit the site with cookies turned off, but may find that some attributes of the Website are inaccessible or unusable as a result.

3. Consent

The Company's collection of Personal Information is performed in compliance with this Privacy Policy. As such, it can be collected only with your knowledge and consent, or in compliance with the Act.

Your consent can be obtained in a variety of ways. It may be obtained expressly, or it may be determined from the circumstances that it can be implied. Consent will be implied whenever you have responded to one of the Salespeople in regard to a product or service, or via a means of communication from which it is reasonably apparent that you have seen references to the existence and availability of this Privacy Policy. Specifically, the Company believes that you expect to be advised of new or existing products or services that seem to be relevant to you and your disclosed interests, as per paragraph 2(b) above.

Your consent can be withdrawn or modified, by your provision of written notice to the Company's Privacy Officer. This may result in reduced access to the benefits offered by the Company and its Salespeople.

From time to time, the Company will rely upon trusted third party suppliers, or strategic alliance partners, to provide certain services. Each must have a Privacy Policy that complies with the Act. Personal Information will be relayed to such companies, and your consent to this is implied.

Your consent will also be implied to the Company's disclosure of Personal Information to its lawyer, to police and similar authorities, to any other person authorized by the Act, and in an emergency situation in which your life, health and safety is in danger.

4. Limiting Collection

The Company collects and uses Personal Information in accordance with the Act, for the purposes set forth in this Privacy Policy.

5. Limiting Use, Disclosure and Retention

Your Personal Information will be used only for the purposes, and in the ways, outlined in this Privacy Policy, or as otherwise authorized by the law. Similarly, disclosure of it to others is governed by the principle that you must consent to such forwarding.

Personal Information is retained until the later of the day after:

- a) the last day that the Company is required by law to retain it,
- b) the last day that the Company reasonably believes it needs to be retained in order to allow you to access it in the event that it affected a decision involving you, and
- c) the day it is no longer required to be retained in conjunction with the purposes listed in section 2 above, unless you have earlier requested in writing that such data be disposed of.

Personal Information is disposed of in a manner consistent with the intent of the Act. It may be discarded, erased, shredded, rendered anonymous or otherwise destroyed.

6. Accuracy

The Company is committed to accuracy in the collection and use of your Personal Information. It assumes that such data is correct when provided, by you or on your behalf. You are invited to review (and notify of any apparent errors in) your own Personal Information by contacting the Privacy Officer. In the absence of such notification, Personal Information will be assumed to be accurate. Once advised in writing of errors in Personal Information that sources from a third party, the Company will direct you to that third party for rectification of your records.

Similarly, you are invited to view and update your Personal Information. The Company assumes no responsibility for such up-dating, except in response to your specific request.

7. Safeguards

Personal Information is secure with the Company. All Personal Information that is collected by it is safeguarded with appropriate security measures that are consistent with this industry and the technology that is currently available. Measures are in place to protect against unauthorized access to, or unauthorized use, alteration, duplication, destruction or disclosure of, your Personal Information. For example, the Company:

- a) imposes strict requirements (e.g. confidentiality agreements, their own Privacy Policy) upon third party suppliers and strategic alliance partners who have access to your Personal Information,
- b) trains staff and Salespeople in the need for security,
- c) limits access to your Personal Information, on a need-to-know basis,
- d) uses locked and password-protected storage facilities, encryption and firewalls, and
- e) disposes of Personal Information in accordance with this Privacy Policy.

8. Openness

The Company's Privacy Policy is readily available. The Company will respond promptly to specific inquiries with respect to it.

9. Individual Access

If you wish to view the Personal Information that the Company has received about you, please apply in writing to the Company's Privacy Officer and provide the required details, background and context. You may be asked to provide photo (or other) identification in order to ensure that the Company does not inadvertently release Personal Information to an inappropriate party. In the unlikely event that a request for access is refused, you will be provided with written reasons for the decision.

You are free to challenge the accuracy or completeness of the Personal Information, upon provision of written evidence in support of your challenge.

10. Challenging Compliance

If you believe that the Company is violating the Act, or this Privacy Policy, please provide details in writing to the Privacy Officer. The Company will investigate and provide as soon as reasonably possible a written response. In the event that such challenge proves to be meritorious, the Company will amend its practices accordingly.

In addition to these general explanations, the Company specifically advises, in relation to its Website, that:

- i) When you visit the Website, Personal Information and email addresses are not automatically recorded.
- ii) However, if you complete and submit a contest entry form or other response to any query, Personal Information is received and forwarded, and it may be that such data will be in a manner consistent with this Privacy Policy.

iii) If you select "continue to send me travel information" or some similarly-worded button, you authorize the Company and/or its Salespeople to contact you and/or to send to you information on products and services that are reasonably believed to be of interest to you.

iv) When you submit Personal Information in relation to another person, you are representing to the Company that you have the authority of that person to supply his or her Personal Information, for use in accordance with this Privacy Policy.

In the event that you have comments or questions about this Privacy Policy, or feel at any time that your privacy-related concerns or complaints have not been resolved satisfactorily, please contact the Company's Privacy Officer at:

- privacy@travelcounsellors.ca and/or
- #501 - 15 Toronto Street, Toronto, Ontario, M5C 2E3.

In effect as of September 25, 2008