

STERLING MARKING PRODUCTS INC.
PRIVACY POLICY
MAY 2008

Sterling Marking Products Inc. recognizes the importance of privacy of personal information. Sterling Marking Products Inc. (also referred to as the “Company”) is committed to collecting, using, disclosing and protecting any personal information the company receives responsibly. The Company’s Privacy Policy sets out how Company members will maintain the confidentiality and privacy of personal information.

Privacy Rights

As of January 1, 2004 all businesses engaged in commercial activities must comply with the Personal Information and Protection & Electronic Documents Act (PIPEDA) and the Canadian Standards Association model code for the protection of personal information approved by the Canadian Standards Association. The Act gives everyone rights concerning the privacy of their personal information.

The Need for Personal Information

Sterling Marking Products Inc provides services to a wide range of clients and needs to collect personal information in order to provide the services required, for establishing and maintaining customer and contact lists and for employment opportunities.

“Personal Information” means information about an identifiable individual that is recorded in any form that relates to an individual’s personal characteristics, their health, their activities and views including information relating to race, national or ethnic origin, colour, religion, politics, age, income, family status, education, medical, health history or conditions or services received by the individual, criminal, employment history, financial information, any identifying number, address, fingerprints, blood type, the personal opinions or views or evaluation of the individual, gender, home address, or an individual’s activities.

Accountability

Sterling Marking Products Inc. has designated Sam Hassan as its Chief Privacy Officer. He is responsible for and will oversee the day to day care and control of Sterling Marking Products Inc.’s personal information.

All Managers in the Company are responsible for overseeing compliance with the terms of the Company’s Privacy Policy.

Sterling Marking Products Inc. has undertaken several measures to ensure compliance with the Company’s Privacy Policy and procedures to ensure personal information is protected. Systems have also been set up to receive and respond to complaints and

inquiries. All employees of the Company are involved in a privacy training initiative. All new Company employees will receive training during their orientation program when they join the Company. The Company will provide information to customers and the general public explaining the Company's Policy and procedures respecting personal information.

Identifying Purposes

All Company employees will collect necessary information by lawful and fair means. The purposes for which personal information is collected will be identified prior to, or at the time of collection. Whenever possible, personal information will be collected directly from the individual at the commencement and as required during the course of the Company's business. In the event an employee identifies new purposes for personal information received, the individual's consent will be obtained to use the information for the new purpose identified, except as required by law. Company employees may obtain information about an individual from other sources such as, but not limited to, the individual's insurance company, from a government agency or registry, an employer, or an accountant in order to provide the services requested.

Consent

All individuals will be advised of the purposes for which the information is being collected, used or disclosed and obtain the individual's consent to collect, use or disclose the personal information, except as required by law.

Limiting Collection

Company employees will limit the collection of personal information to that information which is necessary to fulfill the purposes identified by the Company to provide the services requested, to administer the Company's databases, to include individuals in any marketing activities such as Company services regarding new developments and for employment opportunities. If an individual advises that he or she no longer wishes to receive information about the Company's services, the Company will discontinue sending any further materials. Sterling Marking Products Inc. will not sell, barter, trade or give away personal information to third parties. For example, Sterling Marking Products Inc. does not provide customer mailing lists to any third party.

Limiting Use, Disclosure and Retention

Company employees will not use or disclose personal information for purposes other than those purposes for which the information was originally collected, unless the Company obtains the consent of the individual from whom such information was received to use or disclose the information for another purpose, except as required by law. Sterling Marking Products Inc. will disclose personal information for the following purposes:

1. When the Company is required or authorized by law to do so, or if a court issues a subpoena.
2. When an individual has consented to the disclosure of private information.
3. When the services the Company is providing to an individual requires the Company to give the individual's information to a third party.
4. When it is necessary to establish or collect monies and/or disbursements owing to the Company.
5. When Sterling Marking Products Inc. engages a third party to provide administrative services to the Company including but not limited to file storage, cleaning or security services, in which case the third party will be bound by the Company's Privacy Policy.
6. If the information is already publicly known.

The Company retains personal information for a period of time sufficient to achieve the purposes identified and, to permit the individual to have a reasonable opportunity to obtain access to the information of the services provided and as may be prescribed by regulation.

Sterling Marking Products Inc. considers an individual's personal information as part of a review process for employment opportunities with the Company. Sterling Marking Products Inc. generally retains information from candidates for one year after a decision has been made, unless an individual asks the firm not to retain the information. If an individual accepts a position with Sterling Marking Products Inc, the individual's personal information will be retained in accordance with the Company's Privacy procedures for employee records.

Website & Electronic Transfer of Data

Sterling Marking Products Inc.'s website contains links to other sites which are not governed by Sterling Marking Products Inc.'s Privacy Policy.

Sterling Marking Products Inc., like most other commercial institutions, monitors traffic patterns, site usage and related site information in order to optimize the Company's web service. Sterling Marking Products Inc. may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

Individuals should be aware that email is not a 100% secure medium when contacting the Company to provide personal or confidential information.

Accuracy

In order for the Company to provide professional services and employment to individuals, it is important that an individual's information is accurate and up to date. If an individual's personal information changes during the course of the individual's relationship with the Company, the individual should inform Sterling Marking Products Inc. of the change so that the Company's records can be updated in a timely fashion.

Safeguard

All employees of Sterling Marking Products In. will take reasonable precautions to ensure that personal information is kept safe from loss, unauthorized access or use, modification or disclosure. Among the steps taken to protect confidential and personal information include:

1. Premises securities
2. Restricted file access to personal information
3. Technological safeguards such as security software, passwords and firewalls to prevent hacking or unauthorized computer access.
4. Internal passwords, security and personal information disposal and destruction policies.

Openness and Individual Access

Sterling Marking Products Inc. is pleased to answer any questions an individual may have regarding the collection and maintenance of personal information. Written requests for access to an individual's personal information shall be provided with 30 days after the written request is received, except as required by law. More detailed requests may require archive or other retrieval methods, which could take additional time and be subject to the Company's normal billing.

Individuals with questions regarding the Company's Policy and practices respecting the collection and maintenance of personal information can forward any questions in writing to the Company's Chief Privacy Officer at the address set out below.

Sam Hassan
Chief Privacy Officer
Sterling Marking Products Inc.
349 Ridout Street North, Box 5055
London, ON
N6A 2N8
shassan@sterling.ca

Whenever it is legal and practicable, Sterling Marking Products Inc. may offer the opportunity to deal with general inquires without requesting an individual's name, for example, by accessing general information on the Company's website.

Sterling Marking Products Inc. may, on occasion, request information about individuals from the files of consumer reporting agencies to assist the Company in making credit decisions about customers, prevent fraud, and check the identity of new customers.

Challenging Compliance

Individuals can challenge the Company concerning compliance with the Company's Privacy Policy and procedures with respect to the Company's use or disclosure, or the

Company's refusal to provide access to personal information requested by an individual, or with respect to any other matter relating to the collection, retention or disposal of personal information by the Company by addressing the individual's complaint in writing to the Chief Privacy Officer.

Compliance with Sterling Marking Products Inc. Privacy Policy

Compliance with the Policy and the procedures is mandatory for all managers and employees of Sterling Marking Products Inc.

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