

Star Diamond Corporation Privacy Policy

Star Diamond Corporation (the “Company”) gathers and stores personal information about its employees, contractors, suppliers and others to effectively conduct business and comply with legislative and regulatory requirements.

Personal information includes any factual or subjective information about an identifiable individual, with the exception of business contact information including title, business address and business telephone number.

In the course of conducting its business, the Company may monitor the activities of individuals in respect of its operations and its property. For example, some Company locations are equipped with surveillance cameras. These cameras are generally in high-risk areas or plant sites. Such surveillance cameras are present for the protection of employees and third parties, and to protect against theft, vandalism and damage to the Company’s goods and property. Generally, video recordings are overwritten and destroyed after 30 days (with the exception of video surveillance recordings at the processing plant, which are kept indefinitely) and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

The Company respects individual rights to privacy and, in order to give this effect, agrees to administer the collection, disclosure and use of personal information in accordance with Canada’s *Personal Information Protection and Electronics Document Act* (“*The Act*”). This Policy has been prepared primarily on the basis of 10 Principles of Privacy outlined in Schedule 1 to *The Act*.

In support of the above, the Company will establish and maintain reasonable policies, practices and procedures to ensure that all personal information collected and stored, whether paper based or electronic, is maintained in a secure manner and protected from unauthorized use, disclosure and retention. The Company seeks a balance between an individual’s privacy and the exchange of information necessary to do business. It is the Company’s policy to collect and handle personal information in a fair and lawful manner for legitimate business purposes.

The 10 Fair Information Principles and the Company’s general approach to compliance for each are listed below.

1. Accountability

An organization is responsible for personal information under its control and shall designate an individual to be accountable for the organization’s compliance with these principles.

The Company has appointed a Privacy Officer who is responsible for the protection of all personal information within the Company.

2. Identifying Purposes

The purposes for the collection of personal information must be identified at or before the time of collection.

All persons collecting personal information on the Company's behalf are required to be familiar with the purpose for its use. When new purposes are identified the appropriate level of consent will be obtained prior to use of the information.

3. Consent

The knowledge and consent of the individual is required for the collection, use and disclosure of personal information except where inappropriate.

Where practical, the Company will seek express consent (either written or verbal) for the collection, use and disclosure of personal information, especially information that may be considered sensitive. Implied consent can be used, when the reasons for which information is being collected, used, or disclosed are obvious to a reasonable person, or when the information is legally required. Examples include government forms such as the TD1 form, or the submission of a job application.

Exceptions to the consent rule include situations where the use and/or disclosure of personal information clearly benefits the person concerned, in emergency situations, or other situations authorized by law.

4. Limiting Collection

The amount and type of information gathered must be limited to what is necessary for the identified purposes.

The Company will not collect personal information indiscriminately.

5. Limiting Use, Disclosure and Retention

Information must be used only for the purposes for which it was collected, unless the individual consents to alternate use, or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Except with the consent of the individual or as authorized or required by law, personal information about an individual may only be used for the

purpose for which it was collected or as required by law. Exceptions will require the approval of the Privacy Officer.

If personal information is used or disclosed by an individual for any other reason without proper authorization, that individual may be subject to disciplinary measures including dismissal depending on the nature and extent of the use and disclosure.

The Company has guidelines for the retention of personal information, as well as guidelines for the destruction of personal information that is no longer required.

6. Accuracy

Personal information shall be as accurate, complete and up-to-date as necessary for the purposes for which it is to be used.

The Company will use reasonable efforts to ensure all personal information is up-to-date and accurate.

7. Safeguards

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

Access to personal information shall be restricted to those who have a legitimate business need for access in order to administer authorized Company programs or business activities. All individuals authorized to access such personal information are required to maintain confidentiality of the information in accordance with the Policy.

Due care will be taken when transmitting personal information internally or externally to insure that the method of transmission (whether by telephone, mail, fax, electronically or otherwise) is appropriate to protect the confidentiality of the information in light of its sensitivity.

8. Openness

An organization must make readily available to individuals specific information about its policies and practices relating to the management of personal information.

The Company will make policies available as appropriate for internal or external enquiries.

9. Individual Access

Upon request an individual must be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

The Company upholds the reasonable right of access and review of personal information.

Requests for access to personal information should be made in writing and directed to the Privacy Officer:

Attention: Privacy Officer
Star Diamond Corporation
600, 224 4th Ave. S.
Saskatoon, Saskatchewan
Canada
S7K 5M5

10. Compliance

Individuals must be able to address a challenge concerning compliance with these principles to a designated individual accountable for the organization's compliance.

The Company recognizes the rights of individuals to raise any concerns they may have regarding privacy of their personal information. All enquiries will be addressed with a view to early and amicable resolution. In the event of a complaint, and with the consent of the Privacy Officer and the individual making the complaint, mediation of the complaint will be pursued.

If an individual is not satisfied with the outcome of the mediation, they have the right to pursue the issue with the Privacy Commissioner of Canada.

Individuals who wish to file a complaint must complete a Privacy Complaint Form available from the Company's Head Office and submit it directly to the Company's Privacy Officer.

STAR DIAMOND CORPORATION
PRIVACY COMPLAINT FORM
Alleged Breach of Privacy or Security of Personal Information

1. Please indicate type of alleged information breach:

- Personal information of an individual known to be in the hands of a recipient or recipients who may not be legally entitled to receive the information.
- Personal information of an individual identifiable as at risk of being seen, copied, overheard or accessed by a person or persons who are not entitled to that information.

2. Whose personal information was allegedly breached?

3. When did the breach or potential breach occur?

Month/Day/Year

Time of Day

4. Where did the alleged breach occur?

(Be very specific, give complete site address and description)

5. Please provide full names, job titles and contact information of individuals who were present and their role in the alleged breach. (i.e. Witness, unentitled information recipient, information provider, etc. Attach an additional sheet if necessary).

6. What specific personal information was allegedly breached?

7. Please describe how the specific personal information was allegedly breached.

(Be as thorough as possible. Attach an additional sheet if necessary):

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8. Please list any individuals who were, or may be, directly or indirectly affected by the alleged breach or potential breach.
(Provide full names, job titles and contact information).

9. What action, if any, has been taken to resolve this issue?

Incident Report submitted by:

(Name – Please Print)

(Job Title/Location)

Please provide Star Diamond Corporation with your personal contact information for investigation purposes

I certify that the information in this complaint is truthful to the best of my knowledge and I understand that any personal information provided here is essential in order for Star Diamond Corporation to take the necessary steps toward investigating and, if warranted, rectifying the alleged breach situation as required by the Personal Information Protection and Electronic Documents Act.

Signature

Date (Month/Day/Year)

Please submit this incident report directly to the attention of the Privacy Officer at:

Attention: Privacy Officer
Star Diamond Corporation
600, 224 4th Ave. S.
Saskatoon, Saskatchewan
Canada
S7K 5M5