

DIRECT INTEGRATED TRANSPORTATION INC.

PRIVACY POLICY

PIPEDA (Personal Information and Protection of Electronic Documents Act)

INTRODUCTION

Direct Integrated Transportation Inc. (“Direct”) recognizes your right to privacy and the sensitivity of your personal information. We are taking every possible measure to ensure all personal information is handled with great care as reflected through this privacy policy. It is the policy of Direct to control the collection, use, and disclosure of personal information in accordance with all the requirements set out in the Personal Information and Protection of Electronic Documents Act (“PIPEDA”). “Personal information” is any information that identifies an individual or by which an individual’s identity could be deduced. If we did not collect and use your personal information, we could not provide you with our services.

Direct collects personal information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible, we collect your personal information directly from you at the start of our service relationship.

Information received from customers, suppliers or employees is not shared with anyone outside the Direct corporate entity. Information excluded from PIPEDA will be treated in a similar fashion.

There are 10 principles that make up PIPEDA. They are stated as follows with an explanation of the company requirement:

Principle 1 – Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization’s compliance with PIPEDA and the principles thereunder. For that purpose, Direct has designated the Director of Finance (in charge of HR related functions)

Principle 2 – Identifying Purposes

The purposes for which personal information is collected shall be identified by Direct at or before the time the information is collected. For example, Direct needs personal information.

Principle 3 – Consent

The knowledge and consent of the individual are required for the collection or disclosure of personal information, except where inappropriate. In most cases, we will ask you to specifically consent if we collect, use or disclose your personal information.

Note: In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, certain legal, medical, or security reasons may make it next to impossible to seek consent.

Principle 4 – Limiting Collection

The collection of personal information by Direct shall be limited to that which is necessary for the purposes identified. Personal information shall be collected by fair and lawful means.

Principle 5 – Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by the law. Direct will retain personal information only as long as necessary for the fulfillment of those purposes, or as required by law.

Direct uses your personal information to provide services to you and to administer your file (ie. billing databases). In addition, from time to time, Direct may contact you requesting additional personal information to assist us in maintaining our contact or mailing lists, or to assist us in providing our services to you.

We also collect personal information if you send an e-mail to one or more members of our firm and we use such information only for the specific purpose for which you submit the information. By providing Direct with personal information by way of e-mail, you consent to the collection and use of such information in accordance with this privacy statement.

Direct does not disclose any personal information to any third parties, except as required by law. Notwithstanding the generality of the foregoing, there are circumstances where disclosure may be justified or permitted or, where we are obliged to disclose personal information without consent, including, without limitation where (1) the information is known to the public (2) required by law or by order of a tribunal (3) we believe, upon reasonable grounds, that there is an imminent risk to an identifiable person or group of death or serious bodily harm (4) it is alleged that an employee of Direct is guilty of a criminal offence; civilly liable in a legal action or guilty of malpractice. In such circumstances, we will not disclose more personal information than is required.

Direct does not disclose your personal information to any third party to enable them to market their products and services. Under certain circumstances, however, Direct will disclose your personal information, for example:

- when we are required or authorized by law to do so, for example, if a court issues a subpoena;
- the information is known to the public

- we believe, upon reasonable grounds, that there is an imminent risk to an identifiable person or group of death or serious bodily harm
- when you have consented to the disclosure

(please note: the above examples are not intended to be an exhaustive list)

Principle 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. Since we use your personal information to provide our services to you, it is important that the information be accurate and up-to-date. If, during the course of our relationship, any of your information changes, please inform us so that we can make any necessary changes.

Principle 7 – Safeguards

Personal information shall be protected by security safeguards appropriate for the purposes for which it is used. Direct protects personal information to the best of its ability against risks as unauthorized access, theft, disclosure, use, modification, loss or destruction, through appropriate security measures such as:

- premises security
- restricted file access to personal information
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access
- internal password and security policies

Principle 8 – Openness

Direct shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

Direct shall make available:

- a) the title and address of the person or persons accountable for Direct's compliance with the policy and to whom inquiries or complaints can be forwarded;
- b) a means of gaining access to a person's own personal information held by the organizations compliance; and
- c) a description of the type of personal information held by Direct, including a general account for its use.

Principle 9 – Individual Access

Direct will, upon request, inform an individual of the existence, use, and disclosure of his or her personal information and shall grant that individual access to that information. The

individual will have the ability to challenge the accuracy and completeness of the information and have it amended appropriately. If we deny your request for access to, or refuse a request to correct information, we will explain why.

Principle 10 – Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual(s) accountable for Direct's compliance with this policy.

Responsibilities:

All Direct employees who gather, maintain and or use personal information, are responsible for insuring that the personal information collected is carried out in accordance with the policy set out above.

The Director of Finance is accountable for Direct's policies and practices, with respect to the coordination and maintaining of personal information, and is the individual to whom all complaints and inquiries may be forwarded.

This Privacy Statement is in effect as of January 1, 2004. Direct will from time to time review and revise its privacy practices and this Policy Statement. In the event of any amendment, an appropriate notice will be posted on www.directrans.com. Policy changes will apply to the information and data collected from the date of posting and will not be applied to existing information held by Direct without the consent of the person or organization concerned.

If you have questions or concerns regarding this privacy statement or our privacy practices in general, please send an e-mail message to dbarnabe@directrans.com. If you prefer to communicate in writing, please contact our Privacy Officer at: Attention: Director of Finance, Direct Integrated Transportation Inc., 25 Rothwell Road, Winnipeg, Manitoba R3P 2M5. If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at 112 Kent Street, Ottawa, Ontario, K1A 1H3, or 1.800.282.1376.