



See Legal Disclaimer

Last Updated November 26, 2008

Privacy Policy

Stock Research DD Inc. ("SRDDI") provides on-line stock market and public company data enabling Subscribers to systematically research investment ideas.

In this Policy the following terms have the following meanings:

- "Company" means a company whose data in part resides in the Website Content;
- "Services" means the subscription services SRDDI provides to Subscribers through the Website pursuant to a Subscription Agreement;
- "SRDDI" means Stock Research DD Inc., the owner of this Website;
- "Subscriber" means a person who has registered their name, e-mail address, and other required information with the Website, paid SRDDI the requisite charges, if any, and, having accepted the terms of the SRDDI Subscription Agreement, can access the Services and Website Content pursuant to the use of a personal password;
- "Website" means StockResearchPortal.com, this SRDDI Website; and
- "Website Content" means all information and content contained on, distributed through, or linked, downloaded or accessed from this Website.

General

SRDDI is committed to protecting and respecting Subscriber privacy online. This Policy explains what SRDDI does with the personal information that it collects from its Subscribers. Please read the following to understand SRDDI's practices regarding personal information. If you have any questions or concerns regarding this Policy or the personal information practices of SRDDI, you should contact SRDDI using the contact information set out at the end of this Policy.

The Website Content may contain links to other websites that are not owned or operated by SRDDI. Please note that this Policy applies only to the Website and not to the web sites of other organizations to which SRDDI provides a link. SRDDI is not responsible for the privacy policies or practices relating to such third party sites and encourages Subscribers to read and make their own enquiries in respect of same.

Consent

Subscribers signify their consent to SRDDI collecting and using their personal information in accordance with this Policy, as it is amended from time to time, by their use of the Website. The date on which this Policy was last revised is noted on the face of the Policy. Although SRDDI may notify Subscribers of significant changes to the Services, Website and Website Content, Subscribers are encouraged to check the date of the last revisions and to review the Policy carefully if they determine the Website has been amended since their last visit.

Subscribers accessing the Website from outside of Ontario are deemed to have consented to the collection, use and disclosure of their personal information in Ontario.

What Personal Information does SRDDI Collect about Subscribers?

Personal information is information about an identifiable individual. SRDDI requires that individuals supply specified personal information, including their name, e-mail address and possibly credit card details, in order to become a Subscriber. The provision of other personal information requested by SRDDI is voluntary, but may be required in connection with a specific service, a survey or a request for feedback. Compulsory fields are clearly marked on the Subscriber registration form.

SRDDI limits its collection and use of Subscriber personal information to the information it requires to administer its business and to develop, improve and deliver its services to Subscribers.

How does SRDDI use Personal Information Collected from Subscribers?

SRDDI uses the personal information it collects from Subscribers to set up and administer Subscriber accounts, permit Subscribers access to the Website and provide Subscribers with information about the Website and its use, including updates on services and enhancements to the site's functionality. SRDDI also uses the personal information it collects to send Subscribers who opt to receive them, periodic questionnaires about matters connected to the content of the Website ("Questionnaires") and/or information about promotions in which Subscribers may want to participate.

SRDDI will contact Subscribers where required in relation to the administration of their accounts. The method of communication (via e-mail, telephone, or regular or registered mail) is in SRDDI's discretion.

SRDDI may use personal information without consent where permitted or required by law or for the purpose of collecting a debt owed to SRDDI.

Withdrawing Consent for Optional Programs/Terminating Subscription

When first registering, Subscribers are given the option to receive periodic Questionnaires and/or information about promotions. If Subscribers opt-in but subsequently decide they do not want their contact information used for either or both of these purposes, they can withdraw their consent by sending SRDDI an email at info@stockresearchportal.com identifying the information or materials they no longer want to receive.

Subscribers may terminate their SRDDI Subscription Agreement by unsubscribing in accordance with the terms of the SRDDI Subscription Agreement. SRDDI is only able to unsubscribe a Subscriber from the Services by reference to the e-mail address he or she provided at registration and not by their name. Subscriptions will terminate at the next renewal date following receipt of notification of your termination by SRDDI. SRDDI does not send out automatic notifications to Subscribers confirming that they have been unsubscribed from the advisory service.

Disclosure/Transfer of Personal Information by SRDDI

SRDDI uses reputable third party service providers ('Service Providers'), including, where applicable, a financial institution for the authorization of payment transactions and risk management. SRDDI also uses third party service providers to assist it with the design and distribution of website enhancements and other notifications to Subscribers, as well as with analysis of responses to Subscriber Questionnaires. SRDDI transfers personal information about Subscribers to Service Providers for these purposes. SRDDI uses contractual means to ensure that personal information it transfers to Service Providers is protected at a level that is commensurate to the level of protection required under the Personal Information Protection and Electronic Documents Act ("PIPEDA"), the applicable privacy law in Canada. Some of SRDDI's Service Providers may be located in the United States. Where transactions are processed by a Service Provider located in the United States, personal information of Subscribers will be transferred and stored in the United States and could be compelled by the Government of the United States or its agencies under a lawful order made in that country.

SRDDI will disclose personal information without consent where permitted or required to comply with applicable laws, court orders and requests by the Government of Canada or Ontario and regulators made under a statutory or regulatory authority. SRDDI will disclose personal information where the disclosure is required to operate its systems properly or to collect a debt owed to SRDDI.

SRDDI may use, disclose or sell personal information about Subscribers directly to a third party in connection with a contemplated or an actual purchase of insurance, sale, assignment, transfer or other disposal of all or part of its assets. Such use and disclosure may be made for the purpose of determining whether to proceed or to continue with a business transaction or relationship. In the case of a sale or assignment, the personal

information of Subscribers may be used and disclosed by the purchaser or assignee for substantially the same purposes as are described in this Policy.

Electronic Collection of Information - IP Addresses and Cookies

A cookie is an arbitrary piece of information that is sent by a website's server to a browser and stored on the hard drive of a computer. When Subscribers register to use the SRDDI Website, SRDDI employs a cookie to recognize a combination of the Subscriber's user account, computer and browser (collectively referred to as the "Account") and verify and identify the Account's access privileges. Cookies can be disabled, but a Subscriber who chooses not to receive cookies may not be able to access all of the features of the Website.

An Internet Protocol (IP) address is a number that is automatically assigned to a computer by the Internet Service Provider whenever a person is browsing the World Wide Web. For systems administration and troubleshooting purposes, SRDDI logs the IP address of Subscribers. The IP address which is logged cannot be linked to personal information such as the Subscriber's name or address, but lets SRDDI know the type of computer and operating system being used. SRDDI may log IP addresses to track a Subscriber's session which gives SRDDI information about the particular products and services that are most frequently accessed by Subscribers.

How does SRDDI use Information that is not Personal Information?

SRDDI carries out statistical analysis of Subscriber activity on its Website in order to measure Subscriber interest in the various areas of the Website and may inform third parties as to how many Subscribers have visited specific Webpages. Such statistical information is collected with respect to the Website's 'time specific' numbers of registered Subscribers. Statistical information also is collected with respect to the 'period specific' number of times Subscribers view specific:

- portions of Webpages;
- Webpages other than those related to specific Companies; and
- Webpages of individual Companies, including the number of times Subscribers 'click through' to the Websites of those Companies.

The numeric information collected is aggregated, and as mentioned, may be passed on to Companies and to other third parties. *Names, addresses, and any other personal information collected by SRDDI is not supplied to Companies or third parties.*

How does SRDDI Protect Subscriber information?

When Subscribers subscribe for the Services, SRDDI offers the use of a secure server.

The secure server software encrypts the information (e.g. e-mail addresses and, if applicable, credit card details) that Subscribers input before it is transmitted to SRDDI. In addition SRDDI has strict security and confidentiality procedures covering the storage and disclosure of Subscriber personal information in order to safeguard it, to prevent unauthorized access and to comply with PIPEDA. Specifically, SRDDI will permit only authorized employees, who are trained in the handling of personal information, to have access to that information. Employees who violate SRDDI's Policy are subject to disciplinary procedures.

Whenever SRDDI hires other organizations to provide support services, as agents or contractors, SRDDI contractually requires them to conform to its privacy standards and to allow SRDDI to audit their operations for compliance.

While SRDDI does its best to protect the personal information of Subscribers, by using a secure server and implementing the other security measures described above, SRDDI cannot absolutely guarantee the security of any information that is transmitted to it electronically. Subscribers have a role in protecting their personal information. Subscribers are responsible for maintaining the secrecy of their passwords and account information.

Requests for Access, Correction, Assistance or Additional Information

Subscribers are entitled, except in limited circumstances prescribed by law, to obtain access to their personal information in the possession or under the control of SRDDI and to have that information corrected where it is demonstrated to be inaccurate. To request access or a correction to their personal information or to obtain additional information about this Policy or the manner in which their personal information was or is managed by SRDDI, Subscribers are asked to contact SRDDI as follows:

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