

PRIVACY POLICY

This policy statement (the "Policy") sets out the privacy policies and practices for Sharpes Bay Development Corp. ("SBDC") with respect to the collection, use and disclosure of personal information. This policy may be updated by SBDC giving reasonable notice of the revised Policy (including by e-mail or by posting at SBDC's website at www.sharpesbay.com), and this Policy may be supplemented or modified by agreements entered into between SBDC and an individual from time to time.

Personal information is any information about an identifiable individual, as defined under the *Personal Information Protection Act* (BC) or other applicable laws.

1. Privacy Officer

The Privacy Officer is responsible for ensuring SBDC's compliance with this policy statement.

Privacy Officer
6260 Eagle Drive
Whistler, BC V0N 1B6
Ph: 778-928-8008
Fax: 604-714-0795

2. Collection, Use and Disclosure Purposes

Except where otherwise required or permitted by law, SBDC will inform individuals of the purposes for the collection, use or disclosure of the individual's personal information, prior to collecting, using or disclosing that personal information.

SBDC collects information from customers and potential customers through various means including guest registration sign-up sheets, campaign registrations, web-form registrations, purchase and sale agreements and customer survey responses. The type of information collected will vary depending on the means through which an individual submits his/her personal information. The type of information collected may include an individual's name, residential address, e-mail address, home phone number, occupation, employment status, age group, current residential ownership details, whether first time buyer, financial and credit information, real estate investment purposes and preferences, preferred marketing mediums and specific comments.

SBDC uses information collected from customers and potential customers to provide products or services, to respond to requests for information regarding SBDC's products and services, for input on preferred features for future developments, mailing contacts for SBDC publications and newsletters, special events marketing and other marketing research activities, and for additional purposes that may be identified at or before the time that the information is collected. SBDC also uses personal information from purchasers for accounting and transaction completion purposes. SBDC may disclose personal information to legal, financial, and other professional advisors or in connection with the sale or reorganization of all or part of its business or operations.

Requirements for consent to collection, use, or disclosure of personal information vary depending on circumstances and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, which form of consent is appropriate, SBDC will take into

account both the sensitivity of the personal information at issue and the purposes for which SBDC will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed. For example, if an individual provides his/her mailing address and requests information regarding a particular product, consent to use the address to mail product information to the individual is implied.

On giving reasonable written notice to SBDC, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon receipt of this withdrawal, SBDC will notify the individual of the likely consequences of withdrawing his or her consent. Except where otherwise required or permitted by law, SBDC will then stop collecting, using or disclosing the individual's personal information.

3. Limits to the Collection of Personal Information

Except where required or permitted by law, SBDC will limit the collection of personal information to that which is necessary to fulfill the purposes for which it is collected. Personal information will be collected by fair and lawful means.

4. Use, Disclosure and Retention

SBDC will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Once the information is no longer required to fulfill its intended purposes, and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed, erased or made anonymous.

SBDC may disclose certain personal information to third party service providers and to affiliated entities in order to carry out work on behalf of SBDC. Prior to making this disclosure, SBDC will take appropriate steps to ensure that such recipients safeguard the personal information and use the information only for authorized purposes.

5. Accuracy

SBDC will make reasonable efforts to ensure that any personal information collected by it, or on its behalf, is accurate and complete if the personal information is likely to be used by SBDC to make a decision that affects the individual to whom the personal information relates or if the information is likely to be disclosed to a third party.

6. Security

SBDC will protect personal information with security safeguards appropriate to the sensitivity of the information. Security safeguards are employed to protect personal information against loss, theft and unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. The nature of these safeguards will vary depending on the sensitivity of the personal information that has been collected. The methods of safeguards include:

- Physical security measures such as locked filing cabinets and areas
- Security clearances and limiting access on a "need to know" basis
- Technological measures such as the use of passwords

SBDC will inform employees about SBDC's policies and procedures for protecting personal information and employees will be required to conform to SBDC's Privacy Policy.

7. Openness

Upon request, SBDC will make information available about its personal information policies and practices, and its complaint process.

8. Individual Access

Upon written request, with sufficient detail to enable SBDC to identify the individual and the personal information being sought, SBDC will inform an individual of the existence, use and disclosure of his or her personal information under SBDC's control and will provide access to that information, unless otherwise prohibited or permitted by law. SBDC will respond to all requests within 30 days. SBDC may extend the time limit for a further 30 days, or, for a longer period, with the Privacy Commissioner's permission or as otherwise permitted by law.

Upon written request, an individual may request SBDC to correct an error or omission in the personal information that is under SBDC's control. If SBDC is satisfied on reasonable grounds that a correction should be made, it will amend the information as requested as soon as reasonably possible, and it will send the corrected information to each organization to which it has disclosed that information during the year prior to the date of correction.

9. Challenging Compliance

An individual may direct a complaint concerning compliance with the Policy to SBDC's Privacy Officer.

The complaint must be in writing. Within a reasonable time of receipt of the complaint, the Privacy Officer will conduct an investigation into the complaint. The format of this investigation will vary depending on the circumstances and may or may not involve an interview of the complainant and/or SBDC employees conducted by the Privacy Officer.

Within a reasonable time of conclusion of the investigation, the Privacy Officer will inform the complainant, either verbally or in writing, that the complaint is either: (a) denied (if, in the Privacy Officer's opinion, it has no merit); or (b) allowed (if, in the Privacy Officer's opinion, the complaint is valid).

If the Privacy Officer allows the complaint, SBDC will take appropriate measure necessary to rectify the source of the complaint.