

**TALKIC.COM (FORMERLY JACKTHEDONKEY.COM)**  
**PRIVACY STATEMENT**  
**LAST REVISED: JANUARY 9, 2012**

The purpose of this Privacy Statement is to inform you about the types of Personal Information Jack The Donkey Inc. (as follows, “**TALKIC**” “**we**” or “**us**”) collects, uses and discloses. It explains how we use and disclose that information, the choices you have regarding such use and disclosure, and how you may correct that information.

We are proud to demonstrate our commitment to your privacy, by complying with the laws and regulations under applicable privacy laws in Canada, including the *Personal Information Protection and Electronic Documents Act* (Canada).

From time to time, we may make changes to this Privacy Statement. This Privacy Statement is current as of the “last revised” date which appears at the top of this page. We will treat Personal Information in a manner consistent with the Privacy Statement under which it was collected, unless we have your consent to treat it differently. This Privacy Statement applies to any information we collect or receive about you, from any source.

The following topics will be covered in this Privacy Statement:

1. What is Personal Information?
2. How do we collect your Personal Information?
3. Where do we store your Personal Information?
4. How do we use your Personal Information?
5. To whom do we provide your Personal Information?
6. When and how do we obtain your consent?
7. How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?
8. How long will we utilize, disclose or retain your Personal Information?
9. How can you review your Personal Information that we have collected?
10. How do you know that the Personal Information we have on you is accurate?
11. What if the Personal Information we have on you is inaccurate?
12. How fast will we respond to your written requests?
13. Are there any costs to you for requesting information on your Personal Information or practices?
14. How do we know that it is really you requesting your Personal Information?
15. What safeguards have we implemented to protect your Personal Information?
16. How do you contact us regarding access to your Personal Information and our related practices?

## **1. What is Personal Information?**

“**Personal Information**” is any information that is identifiable with you. This information may include but is not limited to your name, mailing address, phone number, email address, business facsimile number, credit card number, household income, banking information, and creditor information. Personal Information, however, does not include your anonymous user statistics, name, business title or business address and business telephone number in your capacity as an employee of an organization.

## **2. How do we collect your Personal Information?**

We will always collect your Personal Information by fair and lawful means (for example, when you subscribe to our service). We often collect Personal Information from you and from third party service providers, where we have obtained your consent to do so or as otherwise permitted by law.

## **3. Where do we store your Personal Information?**

We will store the Personal Information that we collect on servers located in <\*>. Our service providers and business partners may, from time to time, also hold your Personal Information in connection with purposes for which you provided your consent.

## **4. How do we use your Personal Information?**

We identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. We generally use your Personal Information for the following purposes: (a) to establish and maintain our commercial relationship with you and to provide you ongoing service; b) to understand your needs; c) to develop, enhance, market or provide products and services; d) to meet legal or regulatory requirements, including to protect or defend a legal interest, and in connection with an actual or possible Talkic corporate re-organization, merger or amalgamation with another entity, or an actual or possible sale of all or a substantial portion of the assets of Talkic, provided that the Personal Information disclosed continues to be used by the entity acquiring the information either for evaluation of the possible transaction, or, on completion of any such transaction, for the purposes permitted by this Privacy Statement.

## **5. To whom do we provide your Personal Information?**

We identify to whom, and for what purposes, we disclose your Personal Information, at the time we collect such information from you and obtain your consent to such disclosure. For example, we may disclose your Personal Information to third party service providers with whom we have a contractual agreement that includes privacy standards, where such third parties provide services that may be of interest to you.

We will only make disclosures of Personal Information to such persons for whom you provide your consent. Notwithstanding the foregoing, we may also make disclosures of Personal

Information to a potential acquirer in connection with a transaction involving the sale of all or part of Talkic's business or as otherwise permitted or required by law.

In addition, we may send Personal Information outside of the country (including, without limitation, to the United States of America) for the purposes set out above, including for process and storage by service providers in connection with such purposes, and you should note that while such information is out of the country, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

**6. When and how do we obtain your consent?**

We obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information for any purpose. You may provide your consent to us either orally, electronically or in writing.

**7. How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?**

We ensure that all affiliates and other third parties that are retained to perform services on our behalf and are provided with Personal Information are contractually required to observe the intent of this Privacy Statement and practices.

**8. How long will we utilize, disclose or retain your Personal Information?**

We may keep a record of your Personal Information, correspondence or comments in a file specific to you. We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law.

**9. How can you review your Personal Information that we have collected?**

If you make a written request to review any Personal Information about you that we have collected, utilized or disclosed, we will provide you with any such Personal Information to the extent required by law. We will make such Personal Information available to you in a form that is generally understandable, and will explain any abbreviations or codes.

**10. How do you know that the Personal Information we have on you is accurate?**

We will ensure that your Personal Information is kept as accurate, complete and up-to-date as reasonably possible. We will not routinely update your Personal Information, unless such a process is necessary. We expect you, from time to time, to supply us with written updates to your Personal Information, when required.

**11. What if the Personal Information we have on you is inaccurate?**

At any time, you can challenge the accuracy or completeness of your Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

**12. How fast will we respond to your written requests?**

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint to the federal Privacy Commissioner in respect of this time limit.

**13. Are there any costs to you for requesting information about your Personal Information or practices?**

We will not charge any costs for you to access your Personal Information in our records without first providing you with an estimate of the approximate costs, if any, and a thirty (30) day notice period prior to the application of such costs. You may withdraw your requests for access to information by notifying us within the thirty (30) day notice period disclosed on the estimate. If you do not notify us within such thirty (30) day period, we will send you a further notice indicating that you will be deemed to have withdrawn your request for access unless you advise us otherwise within a further thirty (30) days. If, after the expiry of this second thirty (30) day period, you have not so advised us, we will deem your request to have been withdrawn and provide you with written notice to that effect.

**14. How do we know that it is really you requesting your Personal Information?**

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such identifying information shall be used only for this purpose.

**15. What safeguards have we implemented to protect your Personal Information?**

We have implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only employees who are granted access to your Personal Information are those with a business „need-to-know“ or whose duties reasonably require such information.

**16. How do you contact us regarding access to your Personal Information and our related practices?**

All comments, questions, concerns or complaints regarding your Personal Information and practices, should be forwarded to us at [privacy@talkic.com](mailto:privacy@talkic.com).