

Privacy Policy

Purpose & Scope

Northern Thunderbird Air is committed to conducting its business and operations in accordance with the highest ethical standards and all applicable laws, regulations, and rules, including full compliance with the *Personal Information Protection and Electronic Documents Act* (Canada) ("PIPEDA"). This policy addresses the continuing commitment of Northern Thunderbird Air to protecting the Personal Information of our customers and employees in accordance with PIPEDA.

This policy applies to all:

- (i) Northern Thunderbird Air Ltd. and its affiliates (collectively "Northern Thunderbird Air"); and
- (ii) officers, directors, and employees of Northern Thunderbird Air Ltd. and any of its affiliates (collectively "NTA Personnel").

This policy is intended to supplement all applicable laws, regulations, rules, and the corporate policies of Northern Thunderbird Air and is not intended to replace any applicable local laws.

Definitions

- **Commercial Activity:** means any particular transaction, act or conduct or any regular course of conduct that is of a commercial character.
- **Employment Purposes:** means maintaining employment records in compliance with employment, taxation, and other applicable laws.
- **Personal Information:** means information about an identifiable individual (name, date of birth, gender, address, personal telephone number, personal email address), but does not include the name, title or business address of an employee or organization.

Privacy Office

Please contact our Privacy Officer:

- If you have any questions about our Privacy Policy;
- If you would like to request access to, or correct the personal information in our possession about you;
- If you wish to make a complaint about how we have handled your personal information or if you believe we have breached the privacy laws that apply to your personal information .

Our Privacy Officer can be contacted at:

Tel: +1- 587-655-3277

Email: dispatch@ntair.ca

Policy

Accountability

Northern Thunderbird Air has designated the Privacy Officer as the person responsible for ensuring that Northern Thunderbird Air complies with the requirements of PIPEDA.

Identifying Purposes of Collection

Northern Thunderbird Air collects Personal Information for two purposes: (i) Employment Purposes; and
(ii) customer, vendor, or supplier contact information required to support Commercial Activity.
Northern Thunderbird Air does not collect Personal Information for any other purposes.

Consent

Northern Thunderbird Air shall collect Personal Information only with the knowledge and consent of the applicable provider of Personal Information. Any Personal Information provided to Northern Thunderbird Air in order to further Commercial Activity shall only be used for such purposes. Any Personal Information provided to Northern Thunderbird Air for Employment Purposes shall only be used for such purposes. Northern Thunderbird Air will obtain the prior consent of the applicable Personal Information provider before it uses such Personal Information for a different purpose.

Limiting Use, Disclosure and Retention

Northern Thunderbird Air will not use or disclose Personal Information collected by it for any purposes other than those specified in this policy unless: (i) Northern Thunderbird Air obtains the prior consent of the Personal Information provider; or (ii) required by law.

Northern Thunderbird Air shall retain Personal Information collected under this policy only for so long as is: (i) reasonably necessary to fulfill the purposes for which the Personal Information was collected; or (ii) required in order to comply with applicable laws. Any Personal Information no longer required to be retained by Northern Thunderbird Air shall be destroyed, erased, or otherwise rendered unusable.

Accuracy

Personal information collected by Northern Thunderbird Air shall be updated for accuracy and completeness as necessary at the sole discretion of Northern Thunderbird Air. All questions or concerns about the accuracy or completeness of Personal Information retained by Northern Thunderbird Air should be addressed to the Privacy Officer.

Safeguards

All Personal Information collected by Northern Thunderbird Air shall be stored and protected against theft and unauthorized access utilizing both physical controls (limited access to physical records) and information technology controls (passwords, firewalls etc.).

Openness

The privacy practices of Northern Thunderbird Air are outlined in this policy. All questions or concerns about the policy should be addressed to the Privacy Officer.

Individual Access

Subject to limited exceptions, PIPEDA grants individuals the right to access and review any applicable Personal Information regarding themselves that is in possession of an organization. All requests to access or review Personal Information in possession of Northern Thunderbird Air should be addressed to the Privacy Officer.

Challenging Compliance

All questions or concerns about the compliance of this Policy with PIPEDA should be addressed to the Privacy Officer.

Discipline

Any NTA Personnel found to have contravened this policy will be subject to disciplinary action.

In all cases, disciplinary action may include termination for cause, or any other disciplinary action determined by Northern Thunderbird Air.

Disciplinary action taken by Northern Thunderbird Air in respect of any violations of this policy will be in addition to any civil or criminal activity undertaken by any applicable Governmental Authority.

Activities that violate this policy may lead to penalties, fines, and imprisonment.