

	<b>PRIVACY POLICY</b>		
	<b>REVISION NUMBER</b> 1	<b>ORIGINAL ISSUE DATE</b> September 17, 2018	<b>EFFECTIVE DATE</b> May 19, 2021
<b>SCOPE:</b> <p>This Privacy Policy (the “<b>Policy</b>”) addresses personal information about individuals and does not apply to information collected, used, or disclosed with respect to corporate or commercial entities. Corporate and commercial information is, however, protected by other Company policies and practices and through contractual arrangements.</p> <p>This Policy does not impose any limits on the collection, use, or disclosure of your business contact information or publicly available information.</p>			
<b>APPROVED BY:</b>	Board Chair	<b>SIGNATURE:</b> "William Lamb"	
<b>ADMINISTERED BY:</b>	Corporate Governance and Nominations Committee		
<b>RELATED DOCUMENTS:</b>	Code of Business Conduct and Ethics Anti-Corruption and Anti-Bribery Policy Diversity and Inclusion Policy Human Rights Policy Whistleblower Policy Canadian Standards Association (CSA) Model Code Privacy Commissioner for British Columbia		

## OUR COMMITMENT TO PRIVACY

The Company and its subsidiaries (collectively the “**Company**”) are committed to maintaining the security, confidentiality, and privacy of personal information in its possession. The Company strives to respect your privacy and to be an open and accessible organization. This Policy documents our ongoing commitment to those individuals whose personal information the Company may have, such as directors, officers, employees, consultants, and shareholders. This Policy has been developed in compliance with the British Columbia privacy legislation and is based on the Canadian Standards Association (CSA) Model Code.

## DEFINITIONS

In this Policy:

“**collection**” means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means;

“**consent**” means voluntary agreement to the collection, use, and disclosure of personal information for specified purposes. Consent may be express or implied; express consent may be given orally or in writing, if it is unequivocal and does not require any inference on the part of the Company; implied consent exists when the Company can reasonably infer consent based upon your action or inaction;

“**disclosure**” means making personal information available publicly or to a third party;

“**personal information**” means information about an identifiable individual but does not include his or her business contact information; personal information does not include information concerning corporate or commercial entities; it also does not include information that cannot be associated with a specific individual;

“**third party**” means an individual or organization other than the Company and you;

“**use**” means the treatment and handling of personal information by and within the Company; and

“**you**” and “**your**” refer to persons whose personal information the Company may have, including directors, officers, employees, consultants, and shareholders.

## **ACCOUNTABILITY**

The Company is accountable and responsible for personal information under its control. The Company has designated the Corporate Secretary as the person who is accountable for the Company’s compliance with this Policy.

Ultimate accountability for the Company compliance rests with the Company’s Board of Directors which delegates day-to-day accountability to the Corporate Secretary. Other individuals within the Company may be accountable for the day-to-day collection and processing of personal information or to act on behalf of the Corporate Secretary.

The Company will adopt procedures to protect personal information and to receive and respond to complaints and inquiries.

## **PURPOSES**

When collecting information, the Company will state the purpose of collection and will provide, on request, contact information for the Corporate Secretary who can answer questions about the collection.

The Company collects your personal information for the following purposes:

- a. to manage and develop our business, including personnel and employment matters;
- b. to establish, maintain, and facilitate responsible communication with you; and
- c. to meet legal and regulatory requirements.

The above collection, use, and disclosure are a reasonably necessary part of your relationship with the Company.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use.

## **CONSENT**

The Company will obtain your consent to collect, use, or disclose personal information except where the Company is authorized or required by law to do so without consent. The Company will make reasonable efforts to ensure that you understand how your personal information will be used and disclosed. Your consent may be express or implied or given through an authorized representative such as a lawyer, agent, or broker. You can withdraw your consent at any time; however, the Company may collect, use, or disclose personal information without your knowledge or consent in exceptional circumstances such as:

- a. for acting in an emergency that threatens an individual’s life, health, or personal security;
- b. the information is publicly available;
- c. the Company is collecting or paying a debt;
- d. the Company is obtaining legal advice; or
- e. the Company reasonably expects that obtaining consent would compromise an investigation or proceeding.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify the Company that you do not wish your personal information collected/used/disclosed for optional purposes following reasonable notice to you) or otherwise. For example, oral consent could be expressed

over the telephone when information is being collected; electronically when submitting an agreement, application, or other information; or in writing when signing an agreement or application form.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided reasonable written notice of withdrawal of consent is given by you to the Company. Upon receipt of your written notice, the Company will inform you of the likely consequences of the withdrawal, which may include the inability of the Company to provide certain products or services for which the delivery of that information is a prerequisite. If the information is required by law, the Company may decline to deal with a person who will not consent to the use of such information.

#### **LIMITS ON COLLECTION OF PERSONAL INFORMATION**

The Company will only collect personal information for the purposes identified. The Company will use methods that are lawful and will not collect information indiscriminately. The Company may also collect information as authorized by law. The Company and its operations do not target children and individuals under the age of 18 years of age.

#### **LIMITS FOR USING, DISCLOSING, AND RETAINING PERSONAL INFORMATION**

Your personal information will only be used or disclosed for the purposes set out above and as authorized by law. The Company will not sell employee or shareholder lists, or personal information, to third parties.

The Company will retain personal information only as long as necessary or expected to be necessary for the identified purposes, or as required by legislation.

#### **ACCURACY**

The Company will make a reasonable effort to ensure that personal information it is using or disclosing is accurate, complete, and current as required for the purposes for which it was collected. In most cases, the Company will rely on you to ensure that certain information, such as your street address, email address, or telephone number, is current, complete, and accurate.

The Company will not routinely update information unless it is necessary to fulfill the purposes for which it was collected. You may request amendments to your personal information in our records. If appropriate, the Company will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, the Company will annotate the personal information under its control with a note that a correction was requested but not made.

#### **SAFEGUARDING PERSONAL INFORMATION**

The Company is committed to the safekeeping of your personal information in order to prevent its loss, theft, unauthorized access, collection, use, disclosure, duplication, or modification.

The Company has implemented appropriate technical and organizational measures to ensure that its processing of personal data is performed in accordance with applicable data privacy laws. In addition, the Company will take reasonable steps, through contractual or other reasonable means, to ensure that suppliers and agents who assist the Company in providing products and services to you or to whom the Company discloses personal information with your consent, implement a comparable level of personal information protection. Some specific safeguards include, for example, the physical security of offices, and electronic security measures such as passwords and firewalls, and personal identification numbers.

Confidentiality and security are not assured when information is transmitted through email or other wireless communication. The Company will not be responsible for any loss or damage suffered as a result

of a breach of security or confidentiality when you transmit information to the Company by email or other wireless communication or when the Company transmits such information by such means. However, we report known security incidents to both regulators and affected individuals in accordance with applicable data privacy laws.

The Company will use appropriate security measures when disposing of your personal information in order to prevent unauthorized access to such information.

The development of the Company's policies and procedures for the protection of personal information is an ongoing process.

## **OPENNESS**

The Company is open about the policies and procedures it uses to protect your personal information. Disclosure of our policies and procedures will be made available in writing and electronically. However, to ensure the integrity of our security procedures and business methods, the Company may refuse to publicly disclose certain information.

## **PROVIDING ACCESS**

You have a right to access your personal information held by the Company.

Upon written request and proof of your identity, the Company will, within 30 days, tell you what personal information it has, what it is being used for, and give you a description of the individuals and organizations to whom such information has been disclosed. The Company may ask you to be specific about the information you would like to access.

In some situations, the Company may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation, or where there are legal, security, or commercial proprietary reasons for not providing access to certain personal information.

Where an access request is refused in whole or in part, the Company will notify you in writing, giving the reason for refusal and outlining further steps that are available to you.

## **COMPLAINTS**

Any complaints, concerns, or questions regarding this Policy must be directed in writing to the Corporate Secretary by email: [info@bluestonerresources.ca](mailto:info@bluestonerresources.ca). If the Corporate Secretary is unable to address your concern, the issue can be referred to the CEO. At any point in this process, you may write to the Office of the Information and Privacy Commissioner for British Columbia.

## **POLICY REVIEW**

The Company will review this Policy annually to ensure that it is achieving its purpose. Based on the results of the review, the Policy may be revised accordingly.