

PRIVACY POLICY

UrbanStar Capital has corporate policies and procedures in place to ensure that personal information is handled in at least in accordance with all legal and business requirements, specifically, pursuant to the *Personal Information Protection Act (PIPA)* and *Personal Information Protection and Electronic Documents Act of Canada (PIPEDA)*.

PIPA primarily governs our collection, use and disclosure of Personal Information.

Contractually, this Privacy Policy applies to employees, contractors and agents in the delivery of UrbanStar Capital products and services. Please review individual privacy policies when dealing with entities separate and apart from UrbanStar Capital.

This Policy is effective April 1, 2010, and UrbanStar Capital will review and revise its privacy policies and procedures as required from time to time, any amendments will be posted on the UrbanStar Capital web site. Any amendments will be implemented as soon as reasonably practical.

PERSONAL INFORMATION

“**Personal Information**” is any information, recorded in any form, which can identify a specific individual either directly or by inference. Information which does not specifically identify an individual, for example, web site reporting activity and tracking information which does not identify a specific individual, is not Personal Information. Please see Website Privacy for detailed information on use of our website. We do not knowingly collect Personal Information from persons under the age of 18.

The following is the type of Personal Information required from you to receive our monthly newsletter (print or electronic versions):

1. **Identification:** such as your name, home or business address, phone numbers, e-mail addresses;

in addition to the above to establish your identity, the following Personal Information is required from you (or gathered from a variety of sources, references, credit reporting agencies, and other financial institutions with your permission) in order for provision of our products and services:

2. **Application information:** date of birth, social insurance number, and account numbers, annual income, place of employment, investments, account balances, financial liabilities, transaction history;
3. **Financial history and behaviour:** from other financial institutions, payment history and credit worthiness
4. **Business information/business clients: including** business names, addresses, phone numbers, e-mail addresses, industry type, financial status and detail(s) on the owner(s), operator(s) and director(s).
5. **Other additional information** may be requested to help us determine the accuracy of the Personal Information and/or your eligibility for products and services that we offer.

Accuracy of your Personal Information: With your knowledge, consent and assistance, we ensure to maintain accurate, current and complete Personal Information as Accuracy is necessary for the purposes for which UrbanStar Capital requires your Personal Information.

COLLECTION, USE & DISCLOSURE

We collect and use your Personal Information only with your knowledge and consent, for the following purposes, to

1. Verify and confirm your identity;
2. Provision of our products and/or services;
3. Communicate with you through any of e-mail, phone or letter, with respect to provision of products/services, or respond to any inquiries you may have;
4. Conduct our operations and minimize our business risks; and
5. Fulfill regulatory and legal obligations;

If you do not agree with these terms and do not provide consent to us to collect the required Personal Information, we may not be able to provide you with certain products or services.

We recognize and understand the sensitivity of your financial information, as such, we maintain strict confidentiality of your information. Further, we do not sell, trade, license, rent, lease, exchange or otherwise make available any of your Personal Information third parties.

UrbanStar Capital may disclose Personal Information to investment partners working on behalf of UrbanStar Capital. Personal Information will only be provided to such organizations if they agree to use such information solely for the purposes of providing services to UrbanStar Capital and under the instruction of UrbanStar Capital and, with respect to that information, to act in a manner consistent with the relevant principles articulated in this Privacy Policy.

Personal Information may also be subject to transfer to another organization in the event of a merger or change of ownership of all or part of UrbanStar Capital. This will occur only if the parties have entered into an agreement under which the collection, use and disclosure of the information is restricted to those purposes that relate to the business transaction, including a determination whether or not to proceed with the business transaction, and is to be used by the parties to carry out and complete the business transaction.

We may be required to disclose specific Personal Information your consent, when necessary to comply with law, to cooperate with law enforcement or to protect the interests, rights, privacy, property or safety of an identifiable person or group, or prevent fraud. In such event, we will inform you as quickly as reasonably practical.

RETENTION AND DESTRUCTION

UrbanStar Capital keeps Personal Information only as long as it is required for the reasons it was collected—for you to participate in our programs. The length of time we retain information varies, depending on the nature of the information. This period may extend beyond the end of your relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date. When your Personal Information is no longer required for our purposes, we have procedures in place to destroy, delete, or erase it. Currently, the principal places in which UrbanStar Capital holds Personal Information is in its offices in Calgary.

CONFIDENTIALITY AND SECURITY

UrbanStar Capital endeavours to maintain physical, procedural and technical security with respect to our possession of your Personal Information so as to prevent any loss, misuse, unauthorized access, disclosure, or modification.

Maintaining the integrity, security and confidentiality of Personal Information is a high priority. We limit our employees' access to your Personal Information by authorizing only certain employees at any given time to those who need to know the Personal

Information for us to provide the services that you request from us. As there is no method of transmitting or storing information that is completely secure, we are committed to maintaining strict physical, electronic and procedural safeguards which comply with provincial and federal legislation to protect your Personal Information. We review and improve our security standards, practices and procedures as needed to protect against unauthorized access and use of the Personal Information.

EMPLOYEES/CONTRACTORS

By applying to UrbanStar Capital for any position, including posted opportunities and unsolicited applications, you consent to the collection, use and necessary disclosure of the Personal Information provided during the application and selection processes. We collect your Personal Information in this process in order to assess your qualifications and suitability as a potential employee or contractor of UrbanStar Capital. This information will be reviewed only by UrbanStar Capital employees with hiring-related duties. In addition, it will become part of UrbanStar Capital's database of candidates, which we may search to locate qualified candidates for specific positions as they arise.

Should you accept employment with UrbanStar Capital, your Personal Information will be disclosed to third party insurers and providers of employee benefits; to Canadian governmental authorities including the Canada Customs and Revenue Agency, to consultants advising UrbanStar Capital on employment, benefits and pension issues, to other UrbanStar Capital employees in human resources, payroll, or in management positions, and to our legal counsel if relevant in legal matters.

If you do not accept or are not offered a position with UrbanStar Capital, UrbanStar Capital may retain your personal information in our database for up to (1) year. You have the right to correct, update or delete your Personal Information in and from our database at any time before accepting employment or an engagement with UrbanStar Capital. To delete your Personal Information from our database, please send a request to: careers@urbanstarcapital.com.

If you do accept a position with UrbanStar Capital, UrbanStar Capital will ask you for, collect and retain Personal Information throughout your employment and for at least ten (10) years following the termination of your employment or engagement for any reason. Throughout that period, you have the right to request correction of any errors in the Personal Information in UrbanStar Capital's possession. We do not sell, rent, or provide your Personal Information collected through the application, recruitment and employment processes to any third party, although it may be passed on to a third party in the event of a transfer of ownership or assets, or a bankruptcy, of UrbanStar Capital. In such event, you will be notified whenever reasonably practical.

LIMITS TO OUR PRIVACY POLICY

This Privacy Policy only applies to our products, services, web site and individuals working in the capacity of the 'UrbanStar Capital transformation team'. It DOES NOT apply to any other party, including charitable or other organizations we partner with, or links to other resources provided on our web site. This Privacy Policy DOES NOT apply to recommendations made by our employees for products and services not directly offered by us. These other entities may operate under different privacy practices which you have the sole responsibility of reviewing, UrbanStar Capital has no control over the information submitted to or collected by these other entities.

QUESTIONS/CONCERNS/COMMENTS AND ACCESS TO YOUR INFORMATION

If you have any questions or concerns about this Privacy Policy, the collection, use, management, disclosure of Personal Information, or wish to access to your Personal Information in the possession of UrbanStar Capital, please put your request in writing, by:

E-mail to invest@urbanstarcapital.com and include: "Privacy" in the subject line

Or send your correspondence to:

UrbanStar Capital Inc.
Privacy Officer
6023-4th Street SE
Calgary, Alberta T2H 2A5

The UrbanStar Capital Privacy Officer will respond your inquiry within 30 days of receiving your written request.

If you contact us, you may be providing us with some Personal Information including your name, e-mail and perhaps information about your personal circumstances. This information is only used to process and respond to your question or comment, and is collected in compliance with this Privacy Policy and privacy legislation. This information is not disclosed except to authorized individuals who need it to answer your question(s) and for no other purpose. We retain the right to charge you a reasonable fee for the retrieval and/or copying of your Personal Information, if the fees are extensive, we will advise you prior to incurring the fees.