

SAGUARO RESOURCES LTD.

("Saguaro" or "we", "us", "our", etc.)

GENERAL PRIVACY POLICY

Effective Date: September 9, 2013

Saguaro is committed to maintaining the privacy of individuals and protecting personal information in its custody or control in accordance with privacy legislation applicable to Saguaro.

This General Privacy Policy ("**Policy**") describes and summarizes the practices of Saguaro with respect to our collection, use and/or disclosure of personal Information related to all individuals other than employees of Saguaro. References to Saguaro in this Policy therefore include Saguaro's subsidiaries and affiliates unless otherwise stated. Please note that in this context, "employees" includes independent contractors to Saguaro, where such contractors are individuals. For information related to the policies of Saguaro with respect to its employees, Saguaro maintains a separate Employee Privacy Policy, a copy of which is provided to our employees.

Among other things, this Policy describes our obligations and practices under the *Personal Information Protection Act* (Alberta) ("PIPA") and the *Personal Information Protection and Electronic Documents Act* (Canada, "PIPEDA"), as applicable. Personal information we collect, use and disclose is generally processed in Alberta, so in most, if not all cases, PIPA will be the applicable legislation.

This Policy applies only to individuals and does not apply to information about corporations or other legal entities other than individuals. While Saguaro respects its obligations of confidence to legal entities other than individuals, only individuals have rights of privacy.

Definitions

In this Policy, the following terms have the meanings below:

- **Business contact information** means an individual's name and position or title as an official or employee of an organization, as well as their business telephone number, business address, business e-mail, business fax number and other business contact information.
- **Collection of personal information** means obtaining personal information from any source, including the individual themselves and any third party.
- **Disclosure of personal information** means allowing or providing access to all or part of the information. Disclosure will generally be external to Saguaro.
- **Employee** means any individual who provides a service to Saguaro, and includes full-time and part-time employees, temporary employees, volunteers, students, and those in a contract or agency relationship with us.

- **Personal information** means information about an identifiable individual, which does not include information of an aggregate or anonymous nature where a specific individual or individuals cannot be identified. Personal Information also does not include **business contact information**, as long as business contact information is used to contact an individual in their capacity as an employee or official of an organization, and for no other purpose.
- **Use of personal information** means processing or utilizing such information in any manner, including but not limited to using such information to contact the individual. Use includes accessing the information, retaining the information, and how long the information is retained. Use will generally be internal to Saguaro.

Privacy and our website

We do not collect any personal information from you when you simply visit our website at <http://www.saguaroresources.com/>. However, you should be aware that most web servers do collect some information about visitors, such as the browser and version you are using, your operating system, and your "IP" or internet address, which may identify your Internet Service Provider or computer but not the person using it.

If you do proceed to provide us with personal information, such anonymous information may no longer be anonymous, and it may then become personal information subject to this Policy.

If you enter into an agreement with us, or voluntarily submit personal information to us by email or other online means, for purposes of obtaining information or other interaction or communication with us, we will consider that you have done so with your consent for purposes reasonably related to your providing the information. If reasonable to do so, after our initial response, we may send further information to you with information that may be useful, but we will include instructions on how to terminate receiving such further information.

Please be advised that the Internet and email are inherently insecure media, and we cannot take responsibility for the security or privacy of personal information in transit over the Internet.

Please note that our website may contain links to other websites which are provided as a convenience for visitors to our website only. Any third party websites will have their own privacy policies and practices, and we cannot be responsible for such third parties or their websites.

Sources and subjects of personal information

Saguaro generally collects, uses and discloses personal information about the following types of individuals:

- Employees and independent contractors (where such contractors are individuals) of Saguaro for the purposes of establishing, managing and terminating employment and contractor relationships;
- Shareholders and investors in Saguaro;
- Customers and clients (where such customers or clients are individuals) of Saguaro, both current and prospective or potential;
- Directors of Saguaro; and,
- Other individuals who may voluntarily choose to provide Saguaro with personal information.

Saguaro does not knowingly collect, use or disclose personal information about individuals under the age of eighteen years.

Notification and consent

Subject to this Policy and applicable legislation, we will identify the purposes for collection, use and disclosure in advance of collection, and will notify the individual of the purposes for collection, use or disclosure at or before the time of collection. It is the policy of Saguaro to obtain consent from individuals at or before the time their personal information is collected, unless applicable law provides or permits otherwise.

It is generally the policy of Saguaro to not use or disclose personal information in its custody or control except with the consent of the individual and then only for identified purposes. However, individuals should be aware that there are exceptions to the above. For example, with certain personal information related to employees, we do not require consent to collect, use or disclose personal information but we are required to provide notification in advance.

In other circumstances, specifically those set out in applicable legislation, the law does not require that Saguaro obtain consent or provide notification. Saguaro reserves all its rights to rely on any available statutory exemptions and exceptions.

Exceptions to the requirement for consent

Saguaro may collect, use or disclose personal information without consent in circumstances that include but are not limited to the following:

- Where a reasonable person would consider that the collection, use or disclosure of the information is clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;

- Where the collection, use or disclosure of the information is pursuant to a statute or regulation of either Alberta or Canada that authorizes or requires the collection, use or disclosure;
- Where the collection of the information is from a public body and that public body is authorized or required by an enactment of Alberta or Canada to disclose the personal information to Saguario, and, with respect to use or disclosure by us, we are then authorized or required to use or disclose the personal information;
- Where the collection, use or disclosure of the information is reasonable for the purposes of an investigation or a legal proceeding;
- Where the information is publicly available;
- Where the collection, use or disclosure of the information is necessary in order to collect a debt owed to Saguario or for Saguario to repay to an individual money owed by Saguario;
- In certain circumstances, where the information may be disclosed without consent, it may also be used without consent.

Saguario will in all cases collect, use and disclose personal information as required by applicable law, which includes, but is not limited to, the laws related to shareholders in corporations, and directors and officers of corporations. It is also the policy of Saguario to cooperate to the full extent permitted or required by law with law enforcement and governmental agencies requesting disclosure of personal information in the custody or control of Saguario.

In addition to the above, the law generally provides that an individual is deemed to consent to the collection, use or disclosure of personal information about that individual for a particular purpose if the individual voluntarily provides the information for that purpose, and it is reasonable that a person would voluntarily provide that information. If you provide personal information to us voluntarily, we will rely on deemed consent and consider that you consent to our collection, use or disclosure of your personal information as necessary to carry out the purposes for which you provided the information.

Where a new purpose for the use or disclosure of personal information previously collected arises, Saguario will contact the individual in question to obtain any required consent or to provide any required notification for use and/or disclosure for such new purpose or purposes.

Where practical, Saguario will try to collect personal information directly from you. Where necessary, Saguario will collect personal information from other sources. When Saguario collects personal information about individuals directly from them, except when their consent to the collection is deemed or has otherwise been previously and lawfully obtained, or is not legally required, we will tell them the purpose for which the information is collected, and the name of a person who can answer questions about the collection.

Why and how we collect, use and disclose personal information

Saguaro generally collects, uses and discloses personal information for the following purposes:

- Employees: To establish, maintain, manage and terminate an employment or contractor relationship. For further information, Saguaro's Employee Privacy Policy should be consulted.
- Shareholders and investors: Saguaro is required by applicable laws and regulatory authorities to collect, use and disclose certain information with respect to its shareholders. Saguaro also collects, uses and discloses personal information about its investors and shareholders to establish, maintain and termination relationships with them, and to communicate with and interact with its investors and shareholders.
- Directors: Saguaro is required by applicable laws and regulatory authorities to collect, use and disclose certain information with respect to its directors. Saguaro also collects, uses and discloses personal information about its directors and officers in order to manage its business and establish, maintain and terminate its relationships with those individuals.
- Customers and clients: Saguaro generally does not have individual customers or clients. In the event that Saguaro does or may have individual customers or clients, Saguaro will collect, use and disclose personal information about such individual customers and clients for reasonable purposes in order to establish relationships, manage relationships, manage the end or termination of relationships with customers and clients, to provide products or services to clients, and to improve or modify the nature of such products and services and the means of delivery of such products and services.
- Other individuals: Personal information from other individuals may be collected when such individuals contact Saguaro for a variety of reasons personal to them. For example, if you contact us with an inquiry, we will use the information you provide to assist us in responding to you and communicating with you.

Retention and destruction of personal information

Alberta law allows us, for legal or business purposes, to retain personal information for as long as is reasonable. Upon expiry of an appropriate retention period, bearing in mind reasonable legal and business requirements, personal information will either be destroyed in a secure manner or made anonymous.

Should consent to our collection, use, disclosure or retention of personal information be revoked by the individual in question, the law also allows us to continue to retain the information for as long as is reasonable for legal or business purposes. In the event that revocation of consent may have consequences to the individual concerned, we will advise the individual of the consequences of revoking their consent where it is reasonable in the circumstances to do so.

When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate, up to date, and complete.

Outsourcing and data hosting

Saguaro may use third party service providers to process or deal with records, documents, data and information on behalf of Saguaro, and such records, documents, data and information may include personal information. In order to protect the confidentiality and security of personal information processed on behalf of Saguaro by its service providers, Saguaro will use contractual and similar measures with such service providers, including contractual non-disclosure provisions.

Saguaro may use "cloud computing" or other third party information technology service providers, and those providers may be either in or outside Canada, and the data housed, hosted and processed by such providers may reside in or outside of Canada, and may include personal information about individuals. Where consent or notification is legally required, it is our policy to notify individuals about such service providers outside of Canada, and such notification will include the way in which the individual may obtain access to written information about our policies and practices with respect to service providers outside of Canada and the name or title of a person who can answer any questions about the collection, use, disclosure or storage of personal information by any service providers outside Canada.

Security

We recognize our legal obligations to protect the personal information we have gathered about individuals. We have therefore made arrangements to secure against unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. These arrangements may include physical security measures, network security measures, and organizational measures such as non-disclosure agreements and need-to-know access.

Notification of loss or unauthorized access or disclosure

Where an incident occurs involving the loss of or unauthorized access to or disclosure of personal information under our control, where a reasonable person would consider that there exists a real risk of significant harm to an individual as a result of the loss or unauthorized access or disclosure, we will, without unreasonable delay, provide notice to the Information and Privacy Commissioner for Alberta of the incident, including any information required by law at the time to be provided to the Commissioner. While Alberta law provides that the Commissioner has the authority to require us to notify individuals of the unauthorized access or disclosure, we may elect to immediately do so in the event we consider it reasonable in the circumstances.

Requests for access

Alberta law permits individuals to submit written requests to us to provide them with:

- access to their personal information under the custody or control of Saguario;
- information about the purposes for which their personal information under the custody or control of Saguario has been and is being used; and
- the names of organizations or persons to whom and the circumstances in which personal information has been and is being disclosed by Saguario.

Requests for access are subject to the following:

- Any requests must be in writing.
- We do not accept such requests or respond to such requests via email.
- In order to receive a response to such a request, the individual must provide us with sufficient information to locate their record, if any, and to respond to them.
- We will respond to requests in the time allowed by Alberta law, which is generally 45 days.
- We will make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible.
- All requests may be subject to any fees and disbursements the law permits us to charge.
- Where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to personal information.

Please note that an individual's ability to access his or her personal information under our control is not an absolute right. Alberta law provides that Saguario *must not* disclose personal information where:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure would reveal personal information about another individual; or
- the disclosure would reveal the identity of an individual who has in confidence provided us with an opinion about another individual and the individual providing the opinion does not consent to the disclosure of his or her identity.

Alberta law also provides that Saguario *may choose not to* disclose personal information where:

- the personal information is protected by any legal privilege;
- the disclosure of the information would reveal confidential commercial information and it is not unreasonable to withhold that information;
- the personal information was collected by Saguaro for an investigation or legal proceeding;
- the disclosure of the personal information might result in similar information no longer being provided to us when it is reasonable that it would be provided;
- the personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act
 - under an agreement,
 - under an enactment, or
 - by a court; or
- the personal information relates to or may be used in the exercise of prosecutorial discretion.

Responses to requests

Our responses to requests for access to personal information will be in writing, and will confirm:

- whether we are providing all or part of the requested information,
- whether or not we are allowing access or providing copies, and,
- if access is being provided, when and how that will be given.

If access to information or copies are refused by us, we will provide written reasons for such refusal and the section of PIPA (the *Personal Information Protection Act*, Alberta) on which that refusal is based. We will also provide the name of an individual at Saguaro who can answer questions about the refusal, and particulars of how the requesting individual can ask the Information and Privacy Commissioner of Alberta to review our decision. In order to receive a response to such a request, the individual must provide us with sufficient information to locate their record, if any, and to respond to them.

Requests for correction

Alberta law permits individuals to submit written requests to us to correct errors or omissions in their personal information that is in our custody or control. If an individual alleges errors or omissions in the personal information in our custody or control, we will either:

- correct the personal information and, if reasonable to do so, and if not contrary to law, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the personal information but annotate the personal information that a correction was requested but not made.

Corrections or amendments will rarely, if ever, be made to opinions, including expert or professional opinions, as opposed to factual information, which may be corrected if in error.

Amendment

Saguaro may amend this Policy from time to time as required and without notice, in order to better meet our obligations under the law.

Contacting or communicating with us

If you have any questions with respect to our policies concerning the collection, use, disclosure or handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, or if you are dissatisfied with how we handle your personal information, please contact our Privacy Officer at:

Email: privacy@saguaroresources.com

Mail: Saguaro Resources Ltd.
3000, 500 – 4th Avenue SW
Calgary, AB T2P 2V6
Attention: Privacy Officer

Telephone: 403-453-3040
Fax: 403-452-5129

If you remain dissatisfied after our Privacy Officer has reviewed and responded to your concern, or have other concerns or questions, you have the right at any time to contact the Office of the Information and Privacy Commissioner at:

410, 9925 - 109 Street
Edmonton, AB T5K 2J8
Telephone (780) 422-6860 or Fax (780) 422-5682