Privacy Policy

G.E.M. Inc. and its subsidiaries are committed to protecting your privacy. This Privacy Policy sets out G.E.M. Inc's policy with respect to our collection, use, and disclosure of personal information.

Contact Information

G.E.M. Inc. welcomes your comments regarding this Privacy Policy. If you believe that we have not adhered to this Policy or if you wish to review or edit your personal information, please contact us by <u>e-mail</u>, and we will use reasonable commercial efforts to address any concerns that you may have.

Collection of Personal Information

Personal information is information about an identifiable individual. This includes information about your product and service subscriptions and usage. We collect information during the application process, when communicating or transacting business with you, and when providing you with service. We DO NOT collect information about you from third parties that have the right to disclose such information to us nor do we provide such information to others.

Use and Disclosure of Personal Information

Except as part of the sale of all or substantially all of the assets of G.E.M. Inc., G.E.M. Inc. will not sell, trade or rent your personal information to any third party unless we have your consent. We will only use and/or disclose personal information in order to:

- 1. understand and meet your needs and preferences;
- 2. develop new and enhance existing service and product offerings;
- 3. manage and develop our business and operations; and
- 4. meet legal and regulatory requirements.

We also reserve the right to use, disclose, sell, trade, or rent data aggregated provided that the data is not linked to any specific individual. Except where we are required by law to disclose personal information, we will require any person to whom we provide your personal information to agree to comply with our then current Privacy Policy. We will take reasonable commercial efforts to ensure that they comply with our Privacy Policy, however we will have no liability to you if any person fails to do so. To be able to serve you, your personal information may be collected, stored and/or processed or otherwise used by or on our behalf both inside and outside of Canada by third party service providers or by companies in the G.E.M. Inc. corporate family, to perform functions on our behalf. As a result, that country's courts, governments or law enforcement agencies could obtain disclosure of such information under that country's laws.

Security of Your Personal Information

Our site has security measures in place to protect against the loss, misuse and unauthorized alteration of the information under our control. More specifically, our

server uses SSL (Secure Sockets Layer) security protection by encrypting all of your personal information including credit card number, name and address to prevent individuals from reading this information as it travels over the Internet.

Changes to this Privacy Policy

G.E.M. Inc. will occasionally update this Privacy Policy to reflect company and customer feedback or changes to privacy legislation. We encourage you to periodically review this Privacy Policy to be informed of how G.E.M. Inc. is protecting your personal information.

Withdrawal of Consent

Except as required by law, we will not use or disclose your personal information for any purpose for which you refuse us consent or later withdraw your consent. If you withdraw consent, you agree that in spite of this withdrawal we may continue to use the personal information previously provided to us to the extent that we are contractually obligated to do so and to the extent necessary to enforce any contractual obligations you may have to G.E.M. Inc.. You also understand that although you can use our site for some purposes without providing us with any personal information, we need personal information about you for some services, including those that require payment or involve an ongoing relationship with G.E.M. Inc. or our partners. If you refuse to provide us with the information we require or later withdraw your consent to use and disclose this information, we may no longer be able to provide you with these services.

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