

PRIVACY POLICY

Arctic Kingdom is committed to protecting the personal information you share with us. We want you to understand our Privacy Policy and how it impacts you. Please take a moment to review our Privacy Policy. It explains how we collect, use, disclose and safeguard the personal information that you or a third party provide to us. Providing personal information or authorizing a third party to disclose personal information to us signifies your consent to Arctic Kingdom's collection, use and disclosure of your personal information in accordance with this Privacy Policy.

If you do not consent to our practices concerning your personal information as set forth in this Privacy Policy, please do not use our services

Please direct any questions regarding our Privacy Policy or the information contained herein to our Privacy Officer at info@arctickingdom.com

WHAT IS CONSIDERED PERSONAL INFORMATION AND WHY IS IT COLLECTED?

Personal information means information that can identify an individual directly or through other reasonably available means.

We collect various types of personal information in the course of offering services or providing services. As a traveller or potential traveller with Arctic Kingdom, you may be required to provide us with your personal information together with the personal information of those for whom you may be booking adventures, including name, date of birth, address, phone number, email address, credit card details, passport information, dietary restrictions, personal health information, and medication information. As a travel agent, you may be required to provide us with your personal information, including your name, agency information, address, phone number, and email address as well as with the personal information set forth above pertaining to the travellers or potential travellers who you represent.

The collection of this information is done to allow us to provide services to you as requested, including booking trips and accommodation, registering you to receive newsletters, answering your requests for information about our trips, and providing you with information about Arctic Kingdom and/or our services. Furthermore, this personal information allows us to:

- Understand the needs of our customers, whether such customers are travellers or potential travellers, or travel agents, and determine eligibility for our products and services.
- Inform you about our products and services, or those of our partners, that we believe may be of interest to you, via direct marketing, or through mail, telephone or electronic means, and conduct after-sales marketing.
- Provide ongoing service.

If you are providing personal information on someone other than yourself, you are representing to Arctic Kingdom that you have such third parties' consent to provide their personal information in accordance with the terms of this Privacy Policy.

We only send marketing or promotional communications when you have subscribed for such communications, or where your consent to such communications may be implied by law. You may opt out of such communications at any time by following the unsubscribe instructions provided in any of the communications or by contacting our Privacy Officer at info@arctickingdom.com.

Personal information is not collected unless provided to us. This means you can visit and browse our website without having to provide any personal information to Arctic Kingdom.

HOW IS PERSONAL INFORMATION COLLECTED?

Personal information may be collected in a number of ways, including: in person, over the phone, by mail, by email, by fax, over the Internet, in accordance with the website Terms of Use, and from third parties, such as travel agents or family members, who you have authorized to disclose personal information to us.

We make every reasonable effort to ensure that the third parties that disclose your personal information to us have first obtained your consent. If you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please let us know immediately.

Your personal information will only be used or disclosed in accordance with the purposes for which it was collected, unless you have otherwise consented or except where required or permitted by law.

HOW IS YOUR PERSONAL INFORMATION PROTECTED?

To ensure that your personal information is protected, all personal information is stored in secure databases at secure addresses to prevent unauthorized access. Passwords, encryption devices and firewalls that are on par with the industry standard are used to protect these databases. Please note, however, that no data transmission over the Internet can be guaranteed to be 100% secure and, as a result, we cannot ensure the security of information you transmit to us over the Internet.

Access to your personal information is limited to authorized employees only. We keep our employees informed about our policies and procedures. Unauthorized access and disclosure of personal information are strictly prohibited. All of our employees are expected to maintain the confidentiality of personal information at all times.

WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Arctic Kingdom only uses and/or discloses personal information in accordance with the purpose for which such information was collected, and as set forth herein, unless subsequently consented to, or when required or permitted by law.

We have identified below when information is shared, or may be shared, by Arctic Kingdom: (1) generally; (2) in respect of travellers' and potential travellers' personal information; and (3) in respect of travel agents' personal information.

(1) IN GENERAL

When Required or Permitted by Law:

The type of information we are legally required to disclose may relate to criminal investigations. In some instances, such as a legal proceeding or court order, we may be required to disclose your personal information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the disclosure request have legitimate grounds to do so.

Your personal information may also be disclosed in situations where we are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce your rights or to investigate suspicion of unlawful activities. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property and safety of ourselves and others.

Business Transfer, Bankruptcy or Transaction:

We may use your personal information and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of Arctic Kingdom's business or assets (including accounts) for the purposes of evaluating and/or performing the proposed transaction. Our successors and assigns may collect, use and disclose your personal information for substantially the same purposes as those set out in this Privacy Policy. In the event the transaction does not go through, Arctic Kingdom will require, by contract, the other party or parties to the transaction not to use or disclose your personal information in any manner whatsoever for any purpose, and to return or destroy such personal information.

No Sale or Lease of Personal Information:

Arctic Kingdom and its contracted suppliers never sell, lease or trade information about you or your travel information, as applicable, to other parties in the ordinary course of conducting business.

(2) TRAVELER INFORMATION

Travellers on the Same Booking:

You may provide personal information to Arctic Kingdom through our website using a unique login and password, in accordance with our website Terms of Use. Passengers on the same booking will have access to their fellow travellers' personal information. For example, where a wife books a trip under the same booking reference for herself, her husband, and her children, she will have access to each of her husband's and her children's personal information, in addition to her own; or, where a group of friends makes one booking, as a group, with Arctic Kingdom, the individual who made the booking will have access to the rest of the group's personal information.

If you do not want information to be shared with fellow travellers, please contact us and we will create individual bookings for you and your fellow travellers.

Third Party Partners and Suppliers:

In order to effectively provide you with our services, such as facilitating your booking, Arctic Kingdom may share your information with third party vendors, suppliers, and service providers, including ship management companies, charter airlines, hotels, insurance companies, equipment suppliers, and credit card processing entities, all of which may be located outside of Canada and governed by differing privacy legislation. In such instances, Arctic Kingdom will use contractual or other reasonable means to ensure such third parties provide a comparable level of protection over your personal information while the information is being processed by such third party.

(3) AGENT INFORMATION

Third Party Partners and Suppliers:

In making travel arrangements for the persons whom you represent, Arctic Kingdom may share your information with third party vendors, suppliers, and service providers, including ship management companies, charter airlines, hotels, insurance companies, equipment suppliers, and credit card processing entities, all of which may be located outside of Canada and governed by differing privacy legislation. In such instances, Arctic Kingdom will use contractual or other reasonable means to ensure such third parties provide a comparable level of protection over your personal information while the information is being processed by such third party.

WHAT WEBSITE IS GOVERNED BY THIS PRIVACY POLICY?

Our website (www.arctickingdom.com) is governed by the provisions and practices stated in this Privacy Policy. Our website may contain links to third party sites that are not governed by this Privacy Policy. Although we endeavour to only link to sites that share our commitment to your privacy, please be aware that this Privacy Policy will no longer apply once you leave our website and that we are not responsible for the privacy practices of third party sites. We therefore suggest that you closely examine the respective privacy policies of third party websites to learn how they collect, use and disclose your personal information.

COOKIES – WHAT ARE THEY AND HOW ARE THEY USED BY ARCTIC KINGDOM?

A cookie is a small text file containing a unique identification number that a website sends to your computer's web browser. Arctic Kingdom uses cookies to help speed up the booking process so you do not need to re-type the same information again and again; to measure website usage, such as entry and exit points of visitors, how many people visit a certain section or page, and details of searches performed and related information; and to keep track of transaction information from one page to the next if you are making a purchase.

By changing your browser settings, you can stop websites from accepting cookies or you can request to be prompted before accepting a cookie from the websites that you visit. If you do not accept cookies, however, you may not be able to use or access all functionalities of the Arctic Kingdom website.

CAN I ACCESS MY INFORMATION AND WHOM DO I CONTACT?

Upon request, and as permitted by law, we are pleased to inform you of: the type of personal information we have collected; how your personal information has been used; and any third parties to whom your personal information has been disclosed.

We also make every reasonable effort to keep your personal information as accurate, complete and up-to-date as necessary. If desired, you may verify the accuracy and completeness of your personal information in our records.

Please direct all requests regarding your personal information in writing to:

Attn: Privacy Officer
Arctic Kingdom
215 Traders Blvd E, Unit 18
Mississauga, Ontario L4Z 3K5
E-Mail: info@arctickingdom.com

CAN I REVOKE MY CONSENT TO ARCTIC KINGDOM'S USE OF MY PERSONAL INFORMATION?

By using our products and services and by visiting our website, you consent to the collection, use, retention and disclosure of your personal information as set out in this Privacy Policy.

Subject to legal and contractual restrictions, you can withdraw your consent to Arctic Kingdom's use of your information at any time and with reasonable notice. If you withdraw your consent in respect of a purpose that is required by us to fulfill our products or services contract with you, we may not be able to provide you, or continue to provide you, with such products or services.

You may withdraw such consent at any time by contacting our Privacy Officer:

Attn: Privacy Officer
Arctic Kingdom
215 Traders Blvd E, Unit 18
Mississauga, Ontario L4Z 3K5
E-Mail: info@arctickingdom.com

We will respond to your written request as soon as reasonably practicable and, in any event, within thirty (30) days of receiving your request.

HOW IS MY INFORMATION RETAINED BY ARCTIC KINGDOM?

Except as otherwise permitted or required by law, your personal information will be retained for so long as is reasonably necessary to fulfil the purposes for which it was collected.

HOW WILL CHANGES TO THIS PRIVACY POLICY AFFECT ME?

Any changes to this Privacy Policy and to Arctic Kingdom's information-handling practices will be acknowledged in this policy in a timely manner. Arctic Kingdom may add, modify or remove portions of this policy when it feels that it is appropriate to do so. For substantive changes to this Privacy Policy, Arctic Kingdom will make reasonable efforts to give notice of any such changes. Arctic Kingdom may provide notifications of substantive changes prominently on its

website and/or send an email or other form of communication notifying you of substantive changes to its privacy policy. Substantive changes to the Privacy Policy will be binding thirty (30) days after such changes have been introduced and for which notification of such substantive changes has been made. The date when this Privacy Policy was most recently amended is noted at the bottom of the policy.

WHAT IS THE GOVERNING LAW OF THIS PRIVACY POLICY?

This Privacy Policy, and the handling of personal information, is governed solely by the laws of the Province of Ontario and the federal laws of Canada applicable therein, to the exclusion of any rules of private international law or conflict of laws which would lead to the application of any other laws.

Arctic Kingdom may perform activities outside of Canada through third parties. Personal information may be stored, processed, or accessed in other countries and may be subject to the laws of those countries. In particular, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in these countries. For example, information that is processed, used, stored or accessed in the United States may be subject to the Patriot Act and applicable anti-terrorism legislation, together with other legislation applicable within the United States.

I HAVE MORE QUESTIONS. HOW CAN I GET MORE INFORMATION?

If you have any questions about this Privacy Policy or Arctic Kingdom's information-handling practices, please contact our Privacy Officer at info@arctickingdom.com or at 905-271-4000.

Effective: **May 15, 2013**

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