
PRIVACY POLICY

1. OUR COMMITMENT TO PRIVACY

Queen's Road Capital Investment Ltd. (the "**Company**") is committed to maintaining the security, confidentiality and privacy of personal information in its possession. The Company has always respected your privacy and has strived to be an open and accessible organization. This Privacy Policy documents our on-going commitment to those individuals whose personal information the Company may have, such as directors, officers, employees, consultants, and shareholders.

2. SCOPE OF POLICY

This Privacy Policy 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.

This Privacy Policy does not impose any limits on the collection, use or disclosure of your business contact information or publicly available information.

3. DEFINITIONS

In this Privacy 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 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;

"Privacy Officer" means the Chief Financial Officer of the Company;

"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.

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

4. ACCOUNTABILITY

The Company is accountable and responsible for personal information under its control. The Company has designated its Chief Financial Officer as the Company’s “privacy officer” and the person who is accountable for the Company’s compliance with this Privacy Policy.

Ultimate accountability for the Company compliance rests with the Company’s Board of Directors which delegates day-to-day accountability to the Privacy Officer. 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 Privacy Officer.

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

5. PURPOSES

When collecting information, the Company will state the purpose of collection and will provide, on request, contact information for the Privacy Officer 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, and your consent will be sought unless the use, without consent, is authorized or required by law.

6. 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) the use of information is 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.

7. 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.

8. 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.

9. 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, e-mail 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.

10. 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.

Depending on the sensitivity of the information, the Company will take appropriate security measures to protect the information. 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 e-mail or other wireless communication, and therefore if you choose to communicate with the Company in this manner, it is at your own risk. 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 e-mail or other wireless communication or when the Company transmits such information by such means.

The Company will use appropriate security measures when disposing of your personal information so as 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.

11. 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.

12. 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 a reasonable time period, 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.

The Company may charge a reasonable fee for providing personal information in response to an access request and will provide an estimate of any such fee upon receiving a written access to personal information request. The Company may require a deposit for all or part of the fee.

The Company will make the personal information available within 30 days or provide written notice where additional time is required to fulfill the request.

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.

13. COMPLAINTS

Any complaints, concerns or questions regarding this Privacy Policy must be directed in writing to the Privacy Officer. If the Privacy Officer is unable to address your concern, the issue can be referred to the office of the CEO.

EFFECTIVE DATE

This Policy was last reviewed, revised, approved and adopted by the Board effective on May 7, 2020.