



Cielo Waste Solutions Corp. Privacy Policy

OUR COMMITMENT

Cielo Waste Solutions Corp. (“Cielo” or “the Company”) is committed to safeguarding your personal information.

Our Privacy Policy sets out our standards for collecting, using, disclosing and storing personal information. Our Privacy Policy also explains how we protect your personal information and your right to access that information. This Policy should be read in conjunction with our Employee Privacy Policy.

All Cielo representatives are required to comply with this Policy and to ensure that Cielo’s collection, use, retention and disclosure of Personal Information is in accordance with this Policy and applicable privacy legislation.

PERSONAL INFORMATION

“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 includes information about an individual such as financial, family, and health information. Personal information does not include publicly available information such as that which is contained in a business card, telephone directory or government registry.

Personal information will be protected regardless of its characteristics or its form, whether written, graphic, audio, visual, computerized, or in any other form.

PURPOSE OF INFORMATION COLLECTION

In general, personal information collected, used and disclosed with respect to external parties is for the purposes of:

- providing information about Cielo and its operations to external parties;
- informing and communicating with Cielo shareholders and individuals, residing or working near Cielo facilities;
- managing and administering contracts with external parties;
- managing Cielo’ relationship with and providing for the safety of external parties;

- meeting legal or regulatory requirements or obligations;
- facilitating participation in Cielo events; and
- other reasonable purposes consistent with Cielo' business objectives.

Cielo may collect, use or disclose personal information, without consent, for reasonable business purposes and as provided by privacy law. Personal information may also be transferred to another company in the event of a change of control of Cielo or some form of business combination, merger or joint venture.

Any questions and concerns you may have regarding the purposes for collecting information may be directed to us at the time the request for information is made or to the Privacy Officer at the address provided below.

CONSENT

When we collect personal information from you, we obtain your consent to use the information for the purposes collected. We will obtain your consent for any additional use or collection, or if the purpose of using the information is changed. For less sensitive information, we may accept your verbal consent. Occasionally, we may imply consent where we can infer consent from your action or inaction.

We will not disclose your personal information without express written consent.

You may withdraw your consent at any time. We will inform you of the consequences of such withdrawal, including the possibility that we may not be able to provide a service or information to you.

LIMITS TO USE, COLLECTION, AND DISCLOSURE

We limit the collection of your personal information to what we need in relation to the purposes identified to you.

We collect the information directly from you unless you allow us to collect information from a third party or in accordance with the law.

We limit the use of your personal information to the purposes we have identified to you. This means that we cannot use your personal information for other purposes without your consent, except as required by law.

We cannot disclose your personal information to anyone except with your consent or as required by law.

Your personal information is only accessible to certain authorized persons, and only to the extent necessary to perform their duties.

You have the right to know, on request, to whom the information was disclosed. We maintain accurate records, recording to whom we disclose personal information and in what circumstances it was disclosed.

We will occasionally share your personal information with service providers or agents to ensure the effective provision of services or information to you. These service providers or agents must agree to comply with privacy legislation before receiving any personal information.

RETENTION

We only retain your personal information for as long as needed for the purpose it was collected. When we destroy your personal information, we make sure that confidentially is secured and that no unauthorized person can access the information during the destruction process.

ACCURACY

We make every possible effort to ensure that your personal information is as accurate and complete as necessary for the purposes it is collected, used, or disclosed.

ACCOUNTABILITY

We are accountable for your personal information.

We adhere to privacy legislation, our policies and the procedures developed to support our policy.

All Cielo representatives are trained on these processes and are provided with information about privacy laws.

SAFEGUARDS

We have implemented and continue to implement rigorous safeguards so that your personal information remains strictly confident and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

Protection methods include organizational measures such as requiring security clearances and limiting access to a "need-to-know" basis, physical measures (e.g. building access cards for employees, off-site backups, and archiving), and technological measures such as the use of password and encryption (e.g. the use of routinely changing passwords and firewalls).

REQUESTS FOR ACCESS TO INFORMATION AND AMENDMENTS

You have the right to be informed whether we hold personal information about you. You also have the right to enquire as to how we collected your information, how we used it, and to whom it may have been disclosed.

This information will be provided to you within a reasonable time from the date we receive your written request.

In certain limited and specific circumstances, we may refuse to provide to you the requested information. Exceptions to your access right can include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, information that has been obtained during an investigation of a potential breach of contract or fraud, and information that is subject to solicitor-client or litigation privilege.

You may challenge the accuracy and completeness of your personal information. We will respond to an amendment request within a reasonable time.

Any request for access to information or request for amendment must be sent to:

Chris Sabat, Chief Legal Officer and Corporate Secretary
Suite 1100, 605 – 5th Avenue SW
Calgary AB T2P 3H5
Phone: 1.403.348.2972
Email: info@cielows.com

OUTSOURCING AND DATA HOSTING WITHIN CANADA

Cielo uses "cloud computing" third party service providers, and those providers are in Canada. Company data, including personal information and email sent and received on Company IT infrastructure, is transmitted through, backed up, and stored in Canada.

CASL COMPLIANCE

Canada has implemented stringent legislation (generally referred to as Canadian Anti-Spam Legislation, or "**CASL**") prohibiting commercial electronic communications without adequate consent and without an adequate unsubscribe mechanism. Commercial electronic communications ("**CEM's**") are defined as emails and text messages. Please contact us at the address above if you wish to be removed from our distribution lists.

COMPLAINTS, CONCERNS AND POLICY BREACHES

Complaints concerning the protection of personal information should be addressed to the Privacy Officer at the address provided above.

Disciplinary action may be brought against anyone who violates the policy which could result in termination for cause of employment or position.

PRIVACY AND THE CIELO WEBSITE

Cielo is committed to safeguard your personal information.

With the exception of the use of forms through which a prospective shareholder or other interested individual may request information or directly contact us, Cielo does not collect any Personal Information from visitors to its website. However, visitors should be aware that most web servers do collect information such as the browser and version used, operating system and "IP" or internet address, which information may identify a visitor's Internet Service Provider or computer, but typically not the person using it.

If Personal Information is voluntarily submitted to Cielo by email or other electronic means for purposes of obtaining information, Cielo will consider your consent to be deemed for purposes reasonably related to the provision of the information. As the internet and email are inherently insecure media, Cielo cannot take responsibility for the security or privacy of personal information in transit over same.

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

Some pages on our website may use a technology called "cookies". A cookie is a small file that a server provides to a browser when a website is accessed. Cookies can provide additional functionality to our website and help us to analyze and understand website usage more fully and accurately. Cookies may enhance user experiences, such as avoiding the necessity to enter a password or other identifier on return visits, or customizing the way the website displays to provide similar information to what was previously required. In all cases in which cookies are used, Cielo will not collect Personal Information except with the permission of the visitor. The visitor's web browser may permit erasure of Cielo cookies from the visitor's computer's hard drive, blocking of all cookies, or receiving of a warning before a cookie is accepted and stored. It is the responsibility of the visitor to refer to his or her own browser's instructions to learn more about cookies and how they operate.

Most browsers are initially set to accept cookies. If you would prefer, you can set your browser to disable cookies or to inform you when they are set. You also have the ability to delete cookies that you have accepted. If you delete or disable cookies, you may not be able to take full advantage of our website.

Links to other websites

Some of our websites may contain links to other websites that are not affiliated with us. We do not monitor nor maintain the privacy practices of these websites, and do not have authority over them. We do not assume any responsibility for their privacy policies and procedures.

Procedure for Responding to Requests to Access Private Information and Potential Privacy Breaches

The Privacy Officer (each hereinafter referred to as the “PO”) is responsible for the implementation, monitoring, updating and carrying out the privacy program which includes:

- Policies and procedures;
- Training and awareness;
- Program self-review/assessment;
- Reporting new risks, existing risks, monitoring and any legislative/regulatory changes that will impact the privacy policy on a regular basis to the Chief Executive Officer;
- Serving as point of contact for requests for additional information in relation to Cielo’s Privacy Policy and its processes concerning the safeguarding of personal information; and
- The privacy breach process, and management of complaints.

The PO has the authority and the resources necessary to discharge its responsibilities as assigned under this Procedure. The PO may delegate certain duties to other employees but retains responsibility for the implementation of the Privacy Policy.

The person below has been appointed to the position of Privacy Officer for Cielo:

Chris Sabat, Chief Legal Officer and Corporate Secretary
Suite 1100, 605 – 5th Avenue SW
Calgary AB T2P 3H5
Phone: 1.403.348.2972
Email: info@cielows.com

CONCERNS AND GENERAL INQUIRES

Any concerns, general inquiries or requests related to the Privacy Policy or the management of personal information are forwarded to the PO. The PO will review and acknowledge requests within 48 hours. Periodic progress reports will be provided to individual making the request or query.

REQUESTS FOR ACCESS TO PERSONAL INFORMATION

Under privacy laws, individuals have the right to request access to their personal information held in files maintained by Cielo or those of insurance or investment providers to Cielo and to challenge its accuracy.

Any individual access requests for personal information held in Cielo’s files are addressed within 48 hours. Individual information is provided directly to the individual or their authorized representative upon request.

Personal information will be corrected or amended if its accuracy and completeness is challenged and found to be deficient.

PRIVACY INCIDENT/BREACH PROCESS

A privacy breach occurs when there is the loss of, unauthorized access to or unauthorized disclosure of personal information. Examples of privacy breaches:

- Copies of individual personal information or statements are removed from Cielo premises;
- Cielo laptop is lost/stolen and it contains individual personal information;
- Individual information on a computer hard drive is compromised/hacked;
- Individual information not emailed to the intended external recipient;
- Individual information mailed to an unauthorized address; or
- Release of personal information without proper authorization or use of personal information without proper consent.

Suspected breaches, complaints or any concern relating to personal information are reported immediately to the Cielo PO.

In addition, as applicable, the PO will take steps to:

- File a report with the police;
- Change other system passwords (e.g., online banking);
- Scan computers for malware before accessing systems again; or
- Engage the Company's IT support;
- Recall email immediately; and
- Notify the applicable privacy commissioner

NOTIFICATION OF PRIVACY COMMISSIONER 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 Cielo 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, Cielo will, without unreasonable delay, provide notice to the Information and Privacy Commissioners for Alberta, British Columbia, or Canada (as applicable) of the incident, including any information required by law at the time to be provided to the Commissioner. While privacy legislation in certain jurisdictions provides that the Commissioner has the authority to require the Company to notify individuals of the unauthorized access or disclosure, Cielo may elect to immediately do so in the event it is reasonable in the circumstances. Applicable laws may also require Cielo to create and maintain records of the incident, and it is our policy to comply with those requirements.