



## GENERAL PRIVACY POLICY

Maxim Power Corp., Milner Power Inc., and their related group of companies, which includes all direct and indirect subsidiaries (collectively, "MAXIM", "we", "us" or the "Company") are committed to maintaining the accuracy, confidentiality and security of personal information in the custody or control of MAXIM in compliance with applicable legislation. MAXIM is based in Calgary, Alberta, Canada, and could operate in a number of areas of the world, including (but not limited to) other provinces of Canada and the United States of America. We have developed this privacy policy (the "Policy") to inform you of how MAXIM collects, uses and discloses personal information.

Privacy legislation in Canada generally applies to "personal information", defined as information about an identifiable individual, but does not apply to what is generally referred to as "business contact information" (such as the name, position, title, business telephone number, business address and other contact information of an individual in their capacity as an employee or official of an organization) where the collection, use or disclosure of an individual's business contact information is solely for the purpose of enabling the individual to be contacted in relation to the individual's business responsibilities.

The activities of MAXIM with respect to the collection, use and disclosure of personal information primarily occur in Canada. It is therefore the policy of MAXIM to comply with applicable Canadian legislation, primarily the *Personal Information Protection Act* ("PIPA") (Alberta) and, as applicable, the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") (Canada).

### MAXIM's Sources of Personal Information

MAXIM collects personal information related to its shareholders and directors, visitors to its website, and members of the public or potential investors who contact MAXIM.

MAXIM may collect personal information from individuals who voluntarily provide such information to MAXIM, whether or not MAXIM first requested it.

### Collection of Personal Information

MAXIM generally collects the following personal information:

- **Directors:** MAXIM is required by applicable laws to collect certain information with respect to its directors, including personal contact details such as first and last name, email, phone number, mailing address, birthdate, citizenship, banking details and social insurance number.
- **Shareholders:** MAXIM is required by applicable laws to collect certain information with respect to its shareholders, including personal contact details such as first and last name, email, phone number, and mailing address.
- **Investors:** MAXIM may collect personal information about potential investors who have expressed an interest in investing in MAXIM, including personal contact details such as first and last name, email, phone number, mailing address, and the nature of the potential investor's enquiries or investment interest.

- Public: MAXIM may collect personal information about individuals who contact us, including first and last name, email address, and any additional information that we may need to help us promptly respond to your inquiry.
- Job Applicants: MAXIM may collect personal information about individuals who contact us regarding available positions, such as information contained in a resume, cover letter, or similar employment-related materials

MAXIM may also collect certain personal information about visitors to its website. For more information, please see "Collection of Information by MAXIM's Website", below.

### **Consent**

It is generally the policy and practice of MAXIM to identify the purposes for collection, use and disclosure of personal information in advance of its collection, and to notify the individual of the purposes for collection, use or disclosure at or before the time of collection. However, there are some exceptions to this practice. In some circumstances, MAXIM does not require an individual's consent to collect, use or disclose personal information but is required to provide notification to the individual in advance. In other circumstances, specifically those set out in PIPA and/or PIPEDA, the law does not require that MAXIM obtain consent from an individual or provide notification to that individual.

Where practical, we will try to collect personal information directly from the person to whom the information pertains. We may collect personal information from other sources, as permitted or required by applicable law.

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

### **Use of Personal Information by MAXIM**

We use personal information for the following purposes:

- To contact or reply to individuals who have contacted us where such contact or reply is reasonable in the circumstances, is subject to deemed consent, or is legally required;
- To manage our relationship with and our obligations to our shareholders and investors;
- To reply to individuals who have contacted us with a comment, question or complaint. We may retain this information to assist you in the future and to improve our customer service and service offerings. We also use personal information to establish and manage our relationship with you and provide quality service;
- If you apply for a job with MAXIM, we may use your personal information for the purpose of processing and responding to your application for current and future career opportunities; or
- To fulfill our legal obligations.

## **Sharing of Personal Information by MAXIM**

MAXIM does not sell, rent or disclose your personal information to third parties without your consent, except as described below or as required or permitted by applicable law.

- **Service Providers:** Your personal information may be transferred (or otherwise made available) to third parties that provide services on our behalf. We use service providers to provide services such as hosting the website, processing payments, providing cloud storage services, and other services as required. Our service providers are only provided with the information they need to perform their designated functions and are not authorized to use or disclose personal information for their own marketing or other purposes. Our service providers may be located in the U.S., Canada or other foreign jurisdictions. In the event that personal information is transferred outside of Canada to the US or other foreign jurisdiction, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts, law enforcement and governmental authorities in accordance with those laws. For more information about the policies and procedures that we have regarding foreign service providers, please contact our Privacy Officer. You can obtain access to written information about MAXIM's policies and practices with respect to service providers outside of Canada by contacting us at the contact information set out at the bottom of this Policy.
- **Legal and Compliance:** We and our Canadian, U.S. and other foreign service providers may disclose your personal information in response to a search warrant or other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise may be required or permitted by applicable Canadian, U.S. or other law or legal process, which may include lawful access by U.S. or foreign courts, law enforcement or other government authorities. Your personal information may also be disclosed where necessary for the establishment, exercise or defense of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.
- **Sale of Business:** We may transfer any information we have about you as an asset in connection with a proposed or completed merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of MAXIM or as part of a corporate reorganization or other change in corporate control, including for the purpose of determining whether to proceed or continue with such transaction or business relationship.

## **Collection of Information by MAXIM's Website**

Individuals may visit MAXIM's website without providing any personal information, although an individual may choose to do so, in which case the provisions of this Policy will apply.

Visitors to MAXIM's website should also be aware that most web servers do obtain and log information through the operation of the computers and software involved. This information will generally include your IP address, the identity of your ISP, your operating system, your web browser software and version, page requests, average time spent on our website, and other information about your computer and connection. We use this information to help us understand our website activity and to monitor and improve our website.

**Cookies:** We do use "cookies" in connection with MAXIM's website. A cookie is a tiny element of data that our website sends to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user's computer or device when they return. You may set

your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our website, you may not be able to take advantage of all of the website features.

**Analytics:** This website also uses web analytics services such as Google Analytics. They use cookies to help us analyze how visitors use the website. For example, with Google Analytics, the information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by a Google server. Google uses this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing website operators with other services relating to website activity and internet usage. You can prevent the storage of data relating to your use of the website and created via the cookie (including your IP address) by Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. You can also obtain additional information on Google Analytics' collection and processing of data and data privacy and security at the following link:

- <https://policies.google.com/technologies/partner-sites>; and
- <https://support.google.com/analytics/topic/2919631>.

**Third Party Links:** Our website may contain links to other websites that MAXIM does not own or operate such as social media websites. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. This Privacy Policy does not apply to information collected by the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every website you visit.

**Tracer Tags & Web Beacons:** The website may also use a technology called “tracer tags” or “Web Beacons”. This technology allows us to understand which pages you visit on the websites. These tracer tags are used to help us optimize and tailor the website for you and other future visitors to the website.

### **Retention and Destruction of Personal Information**

We have record retention processes designed to retain personal information for no longer than necessary for the purposes set out herein or as otherwise required to meet legal or business requirements.

### **Security**

We recognize our legal obligations to protect the personal information we have collected about individuals. We therefore have physical, procedural and digital security processes in place to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. MAXIM has taken steps to help ensure that your personal information is only accessed by personnel and third-party service providers on a “need-to-know” basis.

## **Your Choices**

If you have signed-up or agreed to receive our email communications, you can unsubscribe any time by contacting us at the contact information under “Contacting MAXIM with Respect to Privacy” below, or by following the unsubscribe instructions contained in the communication.

If you have provided consent to our collection, use or disclosure of personal information, you can withdraw your consent at any time by contacting us at the contact information set out below. If you withdraw your consent, we may not be able to provide certain products or services to you.

## **Access to Personal Information**

Subject to applicable legislation, you may submit a written request to our Privacy Officer to access, update or correct your personal information in our custody or control. When requesting access to, updating or correction of your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access, update or correct the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

## **Amendment of Policy**

MAXIM reserves the right to amend this Policy from time to time. We may provide notice of such amendments through our website or by updating the effective date of this Policy as shown at the bottom of the first page of this Policy. We encourage you to periodically review this page to ensure you are familiar with those changes.

## **Contacting MAXIM with Respect to Privacy**

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

privacy@maximpowercorp.com  
#1800, 715 – 5<sup>th</sup> Avenue S.W.  
Calgary, Alberta T2P 2X6  
Telephone: (403) 263-3021

If you are dissatisfied with how MAXIM handles your personal information, we invite you to contact our Privacy Officer in writing, setting out the reasons for your concern.