

PRIVACY POLICY

1. INTRODUCTORY COMMENTS

At Ricardo Media Inc. (“RMI” or “we”), we believe that the protection of personal information is of primary importance. That is why we have established this Privacy Policy (the “Policy”) which sets out the way in which RMI collects, uses, discloses and protects your personal information through its website www.ricardocuisine.com (the “Site”) as well as its subscription system for Ricardo Magazine (the “Subscription Section”), which is accessible at:

<http://www.ricardocuisine.com/subscribe>.

Our practices regarding protection of your personal information comply with Canada’s *Personal Information Protection and Electronic Documents Act* (the “PIPEDA”).

If you have any questions or comments regarding this Policy, please contact Customer Service:

Customer Service - Ricardo Media Inc.

300 d'Arran Street
Saint-Lambert
Québec, Canada
J4R 1K5

Telephone: (450) 465-4500 (from 9:00 a.m. to 4:30 p.m., Monday to Friday)

Fax: (450) 465-6800

E-mail: policy@ricardocuisine.com

CONSENT

By submitting personal information to RMI or its agents, you agree that we may collect, use and disclose such personal information in accordance with this privacy policy, the privacy preferences you have made known to us and as permitted or required by law. Third parties to whom personal information may be disclosed may use it

for commercial or philanthropic prospecting purposes only or for purposes described in Section 8 below.

Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting us. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information that may be of value to you.

2. RMI'S COMMITMENT: COMPLY WITH THE TEN PRINCIPLES FOR THE PROTECTION OF PERSONAL INFORMATION.

RMI complies with the ten principles for the protection of personal information set out in the CSA's *Model Code for the Protection of Personal Information (Q830)* and incorporated into the PIPEDA, Canada's legislation for the protection of personal information:

Principle 1 - Accountability

All RMI employees are responsible for the Policy and for RMI's practices with respect to the management of personal information. However, it is important to RMI that, when necessary, you be able to easily identify the persons you can contact in this regard. Consequently, from time to time, certain employees will be specifically designated to assume such responsibility. By sending any questions or comments to Customer Service, we will ensure that they are forwarded to the designated person.

Principle 2 - Identifying Purposes

RMI must identify the purposes for which personal information is collected at or before the time of collection. If we want to collect, use and/or disclose personal information for purposes other than those set out in this Policy, we will obtain your prior consent. You may contact Customer Service at any time to find out the purposes for which your personal information is being or has been collected.

Principle 3 - Consent

RMI will obtain your informed consent for the collection, use or disclosure of your personal information, except as provided for by law.

Principle 4 – Limiting Collection

RMI will limit the collection of personal information to that which is necessary to fulfill the purposes identified by RMI. We will collect your personal information in a fair and lawful manner and will not deceive or mislead you about the purposes for which we are collecting the information.

Principle 5 – Limiting Use, Disclosure, and Retention

RMI will not use or disclose your personal information for purposes other than those identified and for which that information has been collected, unless it has obtained your prior consent or unless such use is permitted or required by law. Where applicable, RMI will indicate whether a request for personal information is compulsory or optional and the consequences of your choice not to disclose any such information. RMI will retain your personal information only for as long as necessary to fulfill the purposes for which your personal information has been collected.

Principle 6 – Accuracy

RMI will take reasonable steps to ensure that your personal information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. We invite you to contribute to the accuracy of your personal information by promptly informing RMI about any change to be made to your file and promptly reporting any error. You can do so by accessing your member zone on the Site or contacting Customer Service, among other ways.

Principle 7 – Safeguards

RMI will protect your personal information with security safeguards appropriate to the sensitivity of the information collected.

Principle 8 – Openness

Upon request, RMI will make readily available to you all information about its policies and practices relating to the management and protection of your personal information.

Principle 9 – Individual Access

Upon request, RMI will inform you of the existence, use, and disclosure of your personal information and give you access to that information, subject to certain exceptions for which we will provide reasons. You will also be able to challenge the accuracy and completeness of the information we hold and to have it corrected as necessary.

Principle 10 – Challenging RMI’s Compliance with the Policy

To make a complaint regarding the implementation or the compliance of this Policy, you may contact RMI’s Customer Service.

3. COLLECTION OF PERSONAL INFORMATION

“Personal information” means any information regarding the personal or financial situation of an identified or identifiable individual. An identifiable person is a person who can be identified, directly or indirectly, by referring to one or more specific elements pertaining to that person’s physical, physiological, mental, economic, cultural or social identity. The notion of personal information includes, without limitation: a person’s family name and given name, home address, home telephone number, cellular telephone number and e-mail address.

In certain circumstances, RMI may ask you to provide certain personal information, for example, when you register on our Site, participate in a contest or write comments on our Site. You are always free to provide or not provide any personal information. If you refuse to provide personal information, you will nevertheless have access to most of the Site. However, you will not be able to access the sections that require you to provide such personal information.

The personal information you provide will be used mainly for the following purposes, in addition to the purposes expressly indicated at the time the information is obtained:

- Help RMI ensure that its Site is relevant by adapting its content to your personal needs;
- Help RMI evaluate and improve its Site;
- Allow RMI to ensure compliance with the rules of netiquette and the quality of interactions in the “Comments” sections;
- Inform you of all facts or events which may be of interest to you.

Unless otherwise indicated, RMI will not disclose the personal information collected to third parties. You can choose to unsubscribe at any time from services requiring your registration by modifying your file or contacting Customer Service.

4. COOKIES

Certain pages on our Site require that cookies be sent. A cookie is a file installed on your computer’s hard drive that contains information to improve communication between our server and your browser. During your first visit, our server will install a permanent cookie on your computer and, depending on the applications used, other permanent or temporary cookies may be used for the technical management of certain choices you make. Please rest assured that no personal information is stored in the cookies.

You may refuse or deactivate cookies. To do so, consult the settings options in your web browser (i.e. Internet Explorer, Google Chrome, Mozilla Firefox, etc.). If you refuse or deactivate one or more cookies, certain functions on our Site may no longer be available.

5. INTERNET PROTOCOL ADDRESS

An internet protocol address (the “IP Address”) is assigned to your computer’s Internet connection by your Internet service provider. RMI may use this IP Address in order to diagnose problems with its web servers, manage its Site or the Subscription Section and compile statistics, among other uses.

6. NAVIGATION INFORMATION

Navigation information is used, among other things, in order to measure the degree of interest in and use of certain parts of our Site and the

Subscription Section by Internet users as well as the effectiveness of certain promotional programs administered by or on behalf of RMI. This information cannot identify you; it is only statistical information regarding the duration of the visit, the pages visited, the order in which pages were visited, etc.

We use the services of Google Analytics to collect navigation information regarding our Site and the Subscription Section. In order to opt out of Google Analytics analyses when surfing the Internet, we invite you to consult tools.google.com/dlpage/gaoptout. To learn more about their privacy policy, please consult the following web page : <http://www.google.com/intl/en/policies/privacy/>.

7. MINORS

If you are under 18, please obtain the permission of a parent or tutor before sending us personal information.

8. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

RMI may, acting in compliance with this Policy and the ten underlying principles, share some of your personal information when it is necessary to do so in order to offer you the services you expect and to which you are entitled. Although RMI cannot be held liable therefor, RMI will take reasonably necessary measures so that the information shared with third parties is kept in a manner that complies with this Policy and its principles.

We may disclose your personal information to the following persons in the following circumstances:

(a) Disclosure to Service Providers

We may disclose your personal information to other companies that provide services on our behalf. In addition, we may disclose your personal information to an organization or individual retained by RMI to evaluate your creditworthiness or to collect debts outstanding on an account or to our auditors. We will only provide those companies the information they need to deliver the service and they are prohibited from using that information for any other purpose.

RMI shares certain personal information with service providers in the following circumstances, among others:

- Subscriptions to Ricardo Magazine (the Subscription Section, accessible at <http://www.ricardocuisine.com/subscribe>) are managed with the Victor software developed by the firm Equisoft (<http://www.equisoft.com/media-publishing/fulfillment-subscription>). To facilitate and speed up the subscription process, RMI may send some of your personal information to Equisoft. For example, if you are already a member of the Site, you will be able to use the same identifiers when ordering your subscription rather than having to register again.

- The Ricardo Cuisine Boutique (the “Boutique”), accessible at <http://boutique.ricardocuisine.com/en/>, is managed by Les Promotions Atlantiques inc. (“PAI”). To facilitate and speed up online purchases from the Boutique, RMI may send some of your personal information to PAI. For example, if you are already a member of the Site, you will be able to use the same identifiers when placing orders in the Boutique rather than having to register again.

- Payments for online purchases made from the Site or the Subscription Section are processed through the Moneris secure payment system: http://www.moneris.com/?sc_lang=en. The information sent is information that is essential for processing your payment. Your credit card number is used only for transactions you make on the Site or the Subscription Section. During a transaction, the information is not accessible to RMI or anyone else, except for the Moneris online payment service. All personal information transmitted when you place an order, including your credit card number, remains strictly confidential and is encrypted so it cannot be intercepted. A small locked padlock at the bottom of the browser window as well as a URL beginning with “https://” rather than “http://” indicate that the page on which you are carrying out your transactions is protected by means of the SSL protocol (Secure Sockets Layer).

(b) Disclosure to Affiliates and Business Units

We may disclose your personal information to any of the companies and business units that form part of the RMI group (i.e. amongst Ricardo Media Inc., its subsidiaries and affiliates) in order to serve you better

and to provide you with information about our group's products and services.

(c) Disclosure to Trading Partners

From time to time our magazines or websites may make their list of customers available to other carefully screened organizations that want to let you know about a product or service that might interest you. The material to be sent to you is reviewed by us before the names and addresses (including e-mail addresses) are released to ensure the organization is reputable and material is appropriate and not misleading.

(d) Disclosure in Business Transfers

RMI may be involved in the sale or transfer of some or all of its business. As part of that sale or transfer, RMI may disclose your personal information to the acquiring organization, but will require the acquiring organization to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy.

(e) Law Enforcement and Legal Disclosure

RMI may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where RMI has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to RMI's legal counsel.

If you would prefer for us not to share your information as described above in sections (a) to (d) above, simply inform us (see our coordinates in the "Introductory Comments" section above).

9. LINKS TO EXTERNAL WEB SITES BELONGING TO THIRD PARTIES

The Site and the Subscription Section contain links to web sites operated by other organizations. RMI has no control over these web

sites or their privacy policies and RMI cannot be held liable in any manner whatsoever for having listed these web sites and having made them accessible to you. We recommend that you carefully examine the personal information protection policies of these other web sites.

10. AMENDMENTS TO THE POLICY

This Policy is effective as of August 11, 2014. When RMI, acting in its sole discretion, modifies this Policy, it will also change the date of the “Most recent update” indicated below.

Although we do not intend to modify this Policy often or substantially, we may do so in order to better serve you in the future or as a result of changes in technology or the law. We therefore invite you to consult this Policy on a regular basis so as to be aware of any changes thereto. Your use of the Site or the Subscription Section after an amended version of the Policy has been posted indicates your consent to be bound by those changes. Every amendment to this Policy becomes effective as soon as it is posted online by RMI.

DATE OF MOST RECENT UPDATE: AUGUST 11, 2014