

#### PRIVACY POLICY

At GRIT INC. we are committed to protecting your privacy online. We created our Privacy Policy ("Policy") in order to demonstrate our firm commitment to protecting the privacy of our shoppers.

Our Internet store allows you to buy products, enter contests, receive special discounts, fill out surveys, and receive newsletters, e-mails or other promotional information from us. We use the information that we collect about you to fulfill your product and service purchases and to create a more personalized online experience. This is just a brief overview, so please read on for more details about our Privacy Policy. This Policy may change from time to time, so please check back periodically.

Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. For some services, we either collect or transfer personal information to a service provider you have selected, or you may visit our Trusted Partners who may collect and use your personal information. We encourage you to ask questions and to be very cautious before you disclose your personal information to others.

Questions regarding this Policy should be directed to info@gritinc.net or may also be contacted directly at the following address:

Grit Inc. P.O. Box 430 Tottenham, ON, Canada L0G 1W0 Toll Free (855) 674-GRIT x227

# 1. What information does GRIT INC. collect from you?

In order to better provide you with numerous products and services, GRIT INC. collects two types of information about its visitors: Personally Identifiable Information and Non-Personally Identifiable Information. Our primary goal in collecting information from you is to provide you with a smooth, efficient, and customized experience while using our site.

# Personally Identifiable Information

This refers to information that lets us know the specifics of who you are. Personal information is requested when you order a product or service, enter contests, fill out surveys, and send us feedback. For example, this information might include your name,

billing address, shipping address, telephone number, e-mail address, credit card or other payment information, and product details. With this information, GRIT INC. can fill your orders and better provide you with personalized services. If you visit one of our Trusted Partners' stores, they will independently collect, use and share your personal information in accordance with their own privacy policies. If you have questions about our Trusted Partners' information practices, please read their privacy policies.

### Non-Personally Identifiable Information

This refers to information that does not by itself identify a specific individual. We gather certain information about you based upon where you shop on our site in several ways. This information is compiled and analyzed on both a personal and an aggregated basis. For example, this information may include the Web site's Uniform Resource Locator ("URL") that you just came from, which URL you next go to, what browser you are using, and your Internet Protocol ("IP") address. A URL is the global address of documents and other resources on the World Wide Web. An IP address is an identifier for a computer or device on a Transmission Control Protocol/Internet Protocol ("TCP/IP") network, such as the World Wide Web. Networks like the web use the TCP/IP protocol to route information based on the IP address of the destination. In other words, an IP address is a number that is automatically assigned to your computer whenever you are surfing the web, allowing web servers to locate and identify your computer. Computers require IP addresses in order for users to communicate on the Internet, browse and shop.

Where do we collect information from you and how do we use it? Our primary goal in collecting personal information is to provide GRIT INC. visitors with a superior customized online experience. We use the customer contact information to fill orders, contact purchasers to inform them of their order status, to send promotional information, to enhance the operation of our site and administer our systems.

Limited demographic data is also collected at our site from our third party advertising server, who provides us with the zip code and area code associated with a visitor's server, along with pages viewed on our site. We review the actions of the GRIT INC. visitors on an aggregate basis to determine customers' preferences. GRIT INC. does research on our visitors' demographics, interests, and pages viewed based on the information provided to us during ordering, a promotion, from our server log files, from contests, drawings or surveys. We will use this data to tailor the visitor's experience at our site, to improve our marketing and promotional efforts, to statistically analyze site use, to improve our product offerings, and to customize our Site's content, layout, and services. We receive summary, but not individual, reports from our third party ad server, which tells us how many ads were presented and clicked upon.

We may also share your personally identifiable information with third parties who provide services to us, our customers and web site visitors. Those third parties include authorized contractors, temporary employees and consultants and other companies working with us (collectively, "agents"). Where we believe it to be appropriate (in our sole discretion), we will ask our agents not to disclose or use your personal information

for purposes other than to provide services to you or GRIT INC.

We gather information in the following ways:

### Shopping

We collect IP addresses for the purposes of system administration, to gather broad demographic information, to report Non-Personally Identifiable Information to our advertisers, and to monitor the level of activity on our site. We collect information from visitors to our site regarding the URLs they came from, domain types (e.g., .com or .org), their IP addresses, the date and time of their visit or order, the number of visits and orders, the number of visits per browsing session, the server type, the operating system and browser type used to come to the site, the country, state and telephone area code where their servers are located, the pages and page titles of our site that visitors viewed during their visit, whether the visitor's computer is enabled for Java or cookies, browser language, applications and plug-ins, and any search terms entered on our site.

### Ordering

When you order from us, we collect personally identifiable information from you. If you order one of our products or services, we will collect and maintain your name, e-mail address, billing address, shipping address, telephone number, product selections, credit card or other payment information, order number, referring URL, IP address and a password. We collect this, and other information, as disclosed in this Policy, in order to fill your order, to communicate with you about your order and to send you promotional materials. Before confirming your order, you will have the opportunity to review the product order form and make changes and additions to the information it contains and these changes will be automatically kept for future use.

## Contact Information and Third Party Data

If you contact GRIT INC. or our customer service representatives by telephone, e-mail or letter, we may keep a record of your correspondence or comments. If you report a problem with our site, we may collect such information in a file specific to you. If you contact us through our feedback area or by calling one of our customer service representatives, we may ask for your name and e-mail address in order to send you a reply. If other users or third parties send us correspondence about your activities or purchases on our site, we may keep the information in a file specific to you. We use a third party to help us provide customer service. In order to help you most effectively, we provide them with your order information.

We also track customers' traffic patterns throughout their online session, including which pages a customer views while using the site. This information is ultimately stored in the form of store categories, and, in some cases, specific URLs. We use your IP address to diagnose problems with our servers, software, to administer our site and to gather demographic information.

We may share aggregated statistics about pages viewed on our site, sales and other shopping information with third parties.

- 3. Who is collecting your information? Website Analysis Agent: We may use an outside service to collect Non-Personally Identifiable Information on an aggregated basis so that we can improve the marketing and layout of our site. They may use cookies to perform their service. For more info, please see the section "Use of Cookies" below.
- With whom do we share your information? Fulfillment: The information collected by GRIT INC. is used only for the limited purposes of processing orders, keeping you informed about your order status, for statistical purposes, for improving our site and its performance, to serve ads, and to notify you of products or special offers that may be of interest to you. We will disclose your Personally Identifiable Information to third parties to charge your credit card, fill your order, deliver your order, provide customer service, provide you with credit and deliver promotional e-mails to you from GRIT INC. For example, we must release your credit card information to the card-issuing bank to confirm payment; and release your address and telephone information to the delivery service to deliver products that you ordered.

Other Parties: We do not sell, trade, or rent your personal information to others without your consent. We may provide Non-Personally Identifiable Information about our customers' sales, traffic patterns, and related site information to third party advertisers, but these statistics do not include any Personally Identifiable Information. We may release account information when we believe that such release is reasonably necessary to enforce and protect the rights, property, and safety of GRIT INC., our users, or others. If customers do not pay us for products ordered, we may submit their account information to a third party collection agency.

Data Analysis Agents: The information collected by or for GRIT INC. may be provided to an outside company for the purpose of analysis. That analysis is to help us to improve our site and product selection, and to notify you of special offers that may be of interest to you. That data analysis agent may not share any Personally Identifiable Information with others, or use it for any other purpose than to help GRIT INC.

Website Analysis Agents: These third parties have permission to use their cookies' identification numbers and internal web site tracking to collect aggregated information to create statistics about our customers and visitors, traffic patterns, and related site information.

Compliance with Service of Process or Law Enforcement: Occasionally GRIT INC. may be required by law enforcement or judicial authorities to provide Personally Identifiable Information to the appropriate governmental authorities. We will disclose Personally Identifiable Information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. GRIT INC. fully cooperates with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the

right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

- 5. How can you update or correct your Personally Identifiable Information?

  We believe you should have the ability to access and edit the personal information that you have provided to us. During the online ordering process you can review, change, or delete the information that you have submitted. You may change any of your personal information in your account online at any time. We encourage you to promptly update your information if it changes. You may ask to have the information on your account deleted or removed; however, because we keep track of past purchases, you cannot delete information associated with past purchases. Also, as a security measure we "back up" the data stored on our systems, and such prior information cannot be completely removed from our databases. As a result, you should not expect that all of your personally identifiable information will be completely removed from our backed-up databases.
- 6. What security precautions are in place to protect against the loss, misuse, or alteration of your information?

At GRIT INC. you can be assured that your personal and account information is secure, consistent with current industry standards. The importance of security for all Personally Identifiable Information associated with our customers is of utmost concern to us. Our secure servers protect the information using advanced firewall technology.

In order to most efficiently serve you, credit card transactions and order fulfillment are handled by established third party banking, processing agents and distribution institutions. They receive the information needed to verify and authorize your credit card or other payment information and to process and ship your order.

When you access your account information, the information is kept on a secure server. All of the customer data we collect is protected against unauthorized access by physical security means.

7. A special note about children's privacy

You must be at least 18 years old to have our permission to use this site. Our policy is that we do not knowingly collect, use or disclose Personally Identifiable Information about visitors under 18 years of age. If you are the parent or guardian of a minor under 18 years of age and believe that they have disclosed personally identifiable information to us, please contact us at info@gritinc.net so that we may delete the minor's information.

8. Use of "cookies" and "action tags"
GRIT INC. Cookies: When you use our site we will store cookies on your computer in order to facilitate and customize your use of our site. A cookie is a small data text file,

which a Web site stores on your computer's hard drive (if your Web browser permits) that can later be retrieved to identify you to GRIT INC. Our cookies store randomly assigned user identification numbers, and the country where you are located. The cookies make your use of the site easier, allow you to retrieve an earlier shopping cart, make the site run more smoothly and help us to maintain a secure site. You will be unable to shop on our site without your browser set to accept cookies.

Website Analysis Agent Cookies: We may use a third party to analyze what our visitors find to be most interesting on our site. To do that, they will place a cookie on your computer with a randomly assigned unique number in order to track the pages you view on our site, along with other Non-Personally Identifiable Information.

9. You should carefully review privacy policies of any third party sites accessible from GRIT INC. Other sites accessible through our web site have their own privacy policies and data collection, use and disclosure practices. Please consult each site's privacy policy. GRIT INC. is not responsible for the policies or practices of third parties. Please be aware that this site may contain links to other sites on the Internet that are owned and operated by third parties. The information practices of those web sites linked to GRIT INC. are not covered by this Privacy Policy. These other sites may send their own cookies to users, collect data, or solicit personal information. Additionally, other companies that place advertising on our site may collect information about you when you view or click on their advertising through the use of cookies. We cannot control this collection of information. You should contact these advertisers directly if you have any questions about their use of the information that they collect.

On behalf of various sponsors, GRIT INC. provides sponsored links to third-party web sites. If you click on a sponsored link or banner ad, a "window" or "frame" containing a third-party's web site may appear in the foreground with the GRIT INC. web site in the background. Unless you are on GRIT INC.'s web site, any time that you have moved to a window, you should assume that your personal information is being collected, used and disclosed in accordance with the windowed site's privacy policy (if any). If you are unsure as to whose privacy policy applies, please contact us by email at info@gritinc.net, or by sending a letter to the address below.

10. Contacting GRIT INC. about privacy questions or concerns If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact GRIT INC. by sending a letter to:

Attn:
Grit Inc.
P.O. Box 430
Tottenham, ON, Canada L0G 1W0
Toll Free (855) 674-GRIT x227

11. Privacy Policy changes This Privacy Policy was last changed on October 25, 2010. If GRIT INC. makes changes to any terms or conditions of the Privacy Policy, the changes will be posted in this document so that you will always know what information we gather, how we might use that information and to whom we will disclose it. We may change, modify, add or remove portions of this Policy at any time, and any changes will become effective immediately upon being posted unless we tell you otherwise.