



Privacy Statement

Stratum Group Ventures Inc. o/a Stratum-Norchief

Effective Date: January 2026

Last Reviewed: January 2026

Stratum Group Ventures Inc. (operating as Stratum-Norchief) is committed to protecting the privacy, confidentiality, and security of personal information in its custody or control. This Privacy Statement describes how personal information is collected, used, disclosed, retained, and safeguarded in compliance with applicable Canadian privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws.

1. Scope and Application

This Privacy Statement applies to all personal information collected, used, or disclosed by Stratum-Norchief in the course of its commercial activities, including information relating to employees, consultants, contractors, clients, client representatives, and website visitors.

2. Accountability

Stratum-Norchief is responsible for personal information under its control and has designated a Privacy Officer who is accountable for compliance with this Privacy Statement and applicable privacy legislation.

3. Definition of Personal Information

Personal information means information about an identifiable individual, including but not limited to name, contact information, identification numbers, employment history, compensation details, compliance credentials, and banking information. Personal information does not include aggregated or anonymized data.

4. Purposes for Collection

Stratum-Norchief collects personal information for purposes including consultant recruitment, workforce management, compliance verification, payroll and invoicing, client reporting, regulatory compliance, information security, and business operations.

5. Consent

Stratum-Norchief obtains consent for the collection, use, and disclosure of personal information except where otherwise permitted or required by law. Consent may be express or implied, depending on the sensitivity of the information and the reasonable expectations of the individual.



6. Limiting Collection

Personal information is collected only as necessary to fulfill identified purposes. Stratum-Norchief does not collect personal information indiscriminately.

7. Use, Disclosure, and Retention

Personal information is used and disclosed only for the purposes for which it was collected or as required by law. Information is retained only as long as necessary to fulfill business, legal, or regulatory requirements, after which it is securely destroyed or anonymized.

8. Safeguards

Stratum-Norchief employs administrative, technical, and physical safeguards appropriate to the sensitivity of the information, including access controls, secure systems, encryption where appropriate, and confidentiality agreements.

9. Accuracy

Reasonable efforts are made to ensure personal information is accurate, complete, and up to date for the purposes for which it is used.

10. Openness

This Privacy Statement is made available to individuals upon request and is published on the company website.

11. Individual Access

Individuals may request access to their personal information, request corrections, or inquire about its use or disclosure, subject to legal limitations.

12. Challenging Compliance

Individuals may raise concerns regarding compliance with this Privacy Statement. Complaints will be investigated and appropriate corrective actions taken.

13. Third-Party Service Providers

Stratum-Norchief may engage third-party service providers for payroll, IT, compliance tracking, or business support. Such providers are contractually required to protect personal information and use it only for authorized purposes.

14. Cross-Border Data Transfers

Personal information may be processed or stored outside Canada where service providers operate. In such cases, information remains subject to contractual safeguards and applicable foreign laws.



15. Breach Response

In the event of a privacy breach involving personal information, Stratum-Norchief will assess the risk, notify affected individuals and regulatory authorities as required by law, and take steps to mitigate harm.

16. Website and Cookies

The company website may use cookies or similar technologies to improve functionality and analytics. Individuals may adjust browser settings to manage cookies.

17. Changes to this Privacy Statement

This Privacy Statement may be updated periodically to reflect legal or operational changes. The revised version will be posted with an updated effective date.

18. Contact Information

Marlin Redpath
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Marlin Redpath (President)

Name / Title

Signature

01/14/2026

Date