

# A. Statement of Purpose

Privacy of personal information is an important principle to Goldgroup Mining Inc. ("Goldgroup" or the "Company"). Goldgroup is committed to collecting, using and disclosing personal information responsibly and only to the extent necessary.

Goldgroup does not sell, rent or share your personal information. Goldgroup will not disclose your personal information except when:

- authorized by you;
- required by law;
- permitted by law (e.g. medical emergency);
- the information is already publicly known; or
- Goldgroup engages a third party to provide administrative services such as computer backup and storage and the third party is bound by our Privacy Policy.

Goldgroup strives to be open and transparent regarding how your personal information is handled. This document describes our Privacy Policy

### B. What is Personal Information?

Personal information is information about an identifiable individual, and includes information that relates to an individual's personal characteristics (e.g., gender, age, income, home address, phone number, and family status). Personal information is different from business information (e.g., an individual's business address and telephone number). Business information is not protected by privacy legislation.

#### C. Who we are

Goldgroup includes its controlled subsidiaries. Goldgroup uses a number of consultants and agencies that may, in the course of their duties, have limited access to the personal information that Goldgroup holds. Their access to any personal information that Goldgroup holds is restricted as much as is reasonably possible. Goldgroup also has their assurance that they follow appropriate privacy principles.



### D. Why Goldgroup Collects Personal Information

Goldgroup collects personal information primarily to communicate with our stakeholders, potential stakeholders and others that might be interested in Goldgroup and to improve communications to them. Information about our employees, contractors and suppliers is also collected for statutory and administrative purposes.

#### E. Consent

In most cases, Goldgroup will ask you to specifically consent to the collection, use or disclosure of your personal information. Goldgroup will request your consent in writing or accept your oral consent or your consent in certain instances may be implied through your contract with us. By browsing the Goldgroup web site, requesting information, sending a letter, facsimile or e-mail you are agreeing to the terms of our Privacy Policy.

#### F. Protecting Personal Information

Goldgroup understands the importance of protecting your personal information and accordingly takes the following precautions:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- Electronic information is transmitted either through a direct line or has identifiers removed or is encrypted.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfil their duties and in accordance with our Privacy Policy.
- External consultants and agencies with access to personal information have agreed to our Privacy Policy.

### G. Retention and Destruction of Personal Information

Goldgroup needs to retain your personal information for some time to ensure that any questions you might have about the services provided can be answered, and for accountability to external regulatory bodies. Contact directories are difficult to systematically destroy, and on your request your contact information will be removed to the extent possible.



Goldgroup destroys paper files containing personal information by shredding them. Electronic information is destroyed by deleting it and, when the hardware is discarded Goldgroup ensures that the hard drive is physically destroyed or electronically wiped.

### H. You can look at your information

With few exceptions, you have the right to see what personal information of yours that Goldgroup holds. If the Goldgroup representative does not know you, it will be necessary for you to confirm your identity before Goldgroup can provide you access to your personal information.

Access to your personal information can be denied if:

- denial is required or authorized by law;
- granting access would have an unreasonable impact on other people's privacy;
- necessary to protect Goldgroup's rights and property; or
- the request is frivolous or vexatious.

You may be requested to put your access request or problems in writing. You will then be advised in writing if Goldgroup can not grant you access to your personal information.

If you believe there is a mistake in your personal information, you have the right to ask for it to be corrected. This applies to factual information only. Goldgroup may ask you to provide documentation that our files are wrong. Where Goldgroup agrees that a mistake was made, Goldgroup will make the correction and, where appropriate, notify anyone to whom this information was sent. If Goldgroup disagrees that a mistake was made, a brief statement from you on the point will be included in our file and, as appropriate, Goldgroup will forward that statement to anyone else who received the earlier information.

### I. Do you have a concern

Our Privacy Officer, can be reached at

Goldgroup Mining Inc.
Suite 1201, 1166 Alberni Street
Vancouver, B.C.
Canada V6E 3Z3

Tel: (604) 682-1943 Fax: (604) 682-5596

Email: info@goldgroupmining.com



and will address any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Officer. That individual will acknowledge receipt of your complaint, ensure that it is investigated promptly, and that you are provided with a formal written decision and the related reasons.

### J. Our Opt-Out Policy

Should you not wish to receive promotional materials, emails or news releases from Goldgroup:

- E-mail us at <a href="mailto:info@goldgroupmining.com">info@goldgroupmining.com</a>; or
- Call us at (604) 682-1943

# K. Normal Goldgroup Website Usage

When you visit the Goldgroup website at <a href="http://www.goldgroupmining.com">http://www.goldgroupmining.com</a>, Goldgroup may collect and store information about your visit in an anonymous, aggregate manner. Goldgroup uses this information to generate statistics, customize information on your personal tastes and measure site activity to improve the website's usefulness to you the visitor. To accomplish this Goldgroup may use a feature of your browser called a "cookie"; this anonymously tracks individual visitor's activities on our site. Cookies, by themselves, cannot be used to find out the identity of any visitor. During normal the web site usage Goldgroup does not collect or store individually identifiable information such as name, mailing address, e-mail address or telephone numbers. By using this site, requesting information or sending e-mail you are agreeing to the terms of our Privacy Policy.

### L. Goldgroup's Mailing List

Subscribers to our mailing list can remove themselves from the list, by:

- 1. replying to an email they have received from the list requesting deletion or by
- 2. sending an email to info@goldgroupmining.com

## M. Electronic mail sent to Goldgroup that contains Personal Information

Visitors to our web site may decide to send Goldgroup individually identifiable information, for example, in a message containing comments and/or suggestions about our web site, requests for information or to request addition to our marketing lists. Goldgroup will only use this individually identifiable information to identify the visitor. Goldgroup will not use this information other than to resolve the matter identified in the e-mail.



#### N. Spam-Free Privacy

Goldgroup will not reveal, sell or rent your e-mail address to third parties. Goldgroup will not send you unsolicited e-mails. Goldgroup only collects and holds your e-mail address and additional information in order to send you the material you have requested. You can opt-out at any time for any reason.

#### O. Links to Other Company Sites

This site may contain links or references to other web sites. Please be aware that Goldgroup does not control the other web sites and that, in any case, this Privacy Policy does not apply to those web sites. Goldgroup encourages you to read the privacy policy of every web site you visit.

## P. Updating this Policy

Any changes to our Privacy Policy and information handling practices shall be acknowledged in this policy in a timely manner. Goldgroup may add, modify or remove portions of this policy when it feels it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the bottom of the Privacy Policy document on the Goldgroup web site. Goldgroup reserves the right to alter our Privacy Policy as business needs require. A revised policy will only apply to data collected subsequent to its effective date. Any alterations to this policy will be posted on our web site in a timely manner.

Reviewed by the Governance & Nominating Committee on December 14, 2018

Approved by the Board of Directors on December 14, 2018