



Cardiome Pharma Corp.'s Personal Information Protection Policy

At Cardiome Pharma Corp., we are committed to protecting the confidential information of our investors, consultants, clinical investigators, clinical subjects and others (our “Affected Persons”).

While we have always respected our Affected Persons' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our Affected Persons of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting Affected Persons' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Affected Persons' personal information and allowing our Affected Persons to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to Cardiome Pharma Corp. and its subsidiary, Cardiome Inc. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of either of them.

Definitions

Personal Information – means information about any identifiable *individual personal information*. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that Cardiome Pharma Corp. complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the Affected Person voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect Affected Persons' information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To verify creditworthiness;
 - To identify investor preferences;
 - To understand the financial needs of our investors;
 - To deliver requested information or information we anticipate will be of interest;
 - To send out information about Cardiome Pharma Corp. or its activities;
 - To evaluate a potential subject with respect to inclusion and exclusion criteria for a clinical trial or a compassionate use program;
 - To audit the performance of a clinical site;
 - To ensure research subject safety;
 - To provide travel bookings or hotel reservations;
 - To make regulatory filings, or otherwise comply with regulatory requirements in Canada or internationally;
 - To maintain compliance with international standards for the conduct of clinical trials or the manufacturing of pharmaceuticals;
 - To make securities filings or otherwise comply with applicable laws; or
 - To protect our intellectual property portfolio; or
 - To publish the results of our research;
 - To obtain insurance protection.

Policy 2 – Consent

- 2.1 We will obtain an Affected Person's consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, electronically or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the investor voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where an Affected Person is given notice and a reasonable opportunity to opt-out of his or her personal information being used for press releases, mail-outs or other notices and the investor does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), an Affected Person can withhold or withdraw their consent for Cardiome Pharma Corp. to use their personal information in certain ways. An Affected Person's decision to withhold or withdraw their consent to

certain uses of personal information may restrict our ability to provide particular information. If so, we will explain the situation to assist the investor, consultant or clinical investigator in making the decision.

2.5 We may collect, use or disclose personal information without the Affected Person's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud; or
- To investigate an anticipated breach of an agreement or a contravention of law.

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose Affected Person personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:

- To evaluate a potential subject with respect to inclusion and exclusion criteria for a clinical trial or a compassionate use program;
- To audit the performance of a clinical site;
- To ensure research subject safety;
- To provide travel bookings or hotel reservations;
- To make regulatory filings, or otherwise comply with regulatory requirements in Canada or internationally;
- To maintain compliance with international standards for the conduct of clinical trials or the manufacturing of pharmaceuticals;
- To make securities filings or otherwise comply with applicable laws; or
- To protect our intellectual property portfolio;
- To publish the results of our research; or
- To obtain insurance protection.

3.2 We will not use or disclose Affected Person personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell Affected Person lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use Affected Person personal information to make a decision that directly affects the Affected Person, we will retain that personal information for at least one year so that the Affected Person has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain Affected Person personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that Affected Person personal information is accurate and complete where it may be used to make a decision about the Affected Person or disclosed to another organization.
- 5.2 Affected Persons may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the Privacy Officer.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the Affected Person's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of Affected Person personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that Affected Person personal information is appropriately protected:
 - Use of locking filing cabinets;
 - Physically securing offices where personal information is held;
 - The use of user IDs for computers, network systems, door locks and elevators;
 - Firewalls, email encryption, secure databases; and
 - Restricting access to personal information as appropriate.
- 6.3 We will use appropriate security measures when destroying Affected Person personal information such as shredding documents and automatic deletion and archiving of electronic files.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Affected Persons Access to Personal Information

- 7.1 Affected Persons have a right to access their personal information, subject to limited exceptions including solicitor-client privilege, health and safety concerns or where doing so would breach a legal or ethical duty.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.
- 7.3 Upon request, we will also tell Affected Persons how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the Affected Persons of the cost and request further direction from the Affected Persons on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the Affected Persons in writing, providing the reasons for refusal and the recourse available to the Affected Persons.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Privacy Officer is responsible for ensuring Cardiome Pharma Corp.'s compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Affected Persons should direct any complaints, concerns or questions regarding Cardiome Pharma Corp.'s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the Investors, consultants and clinical investigators may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Cardiome Pharma Corp.'s Privacy Officer:

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