

### **Exchange Solutions' Privacy Policy.**

### Our Commitment to Privacy.

Exchange Solutions is committed to respecting your privacy and protecting your personal information. This Privacy Policy explains Exchange Solutions' practices regarding the collection, use and disclosure of personally identifiable information that you may provide through this site and your rights as a data owner. Generally, this site is structured so that you can visit it without identifying yourself or revealing any personal information.

However, there are cases where certain types of personal information may be collected on the site. These are further outlined in this policy. This privacy notice is readily linked from our site's homepage and at the bottom of every page on our site.

# Information we may collect from you

We may collect and process the following information about you:

# • Information you provide to us.

You may provide us with information in several ways, including by filling in forms on our websites or on our demonstration applications or by corresponding with us by phone, or email. This includes information you provide when you register for a demo or event, filling out a contact form on our site or entering in to a contractual business relationship with Exchange Solutions.

The personal information that you provide may include your name, address, email address, phone number, company, and other information about you and your company to enable us to provide you with information about our services.

### • Information we collect about you.

When you use our websites or demonstration applications, we automatically collect information about your device, including your IP address, information about your visit (including how you got to our websites) and how you use our site. We may combine this information with other information you have provided to us or which we have received from other sources.

### • Information we receive from other sources.

If you use any of the other websites or services provided by Exchange Solutions, we may receive information about you or your device in relation to that use, including your IP address, information about your visits, and how you use the services of Exchange Solutions.

#### How we use your personal information

We use personal information about you for the following purposes:

### • Providing our services to you and fulfilling your requests

- Providing you with the information, products and services you request from Exchange Solutions.
- Completing any transaction that you do with Exchange Solutions.
- $\circ$   $\;$  Administering promotions that you enter with Exchange Solutions.
- Allowing you to participate in our interactive demonstrations, events and features when you choose to do so.

### • Marketing and advertising

- Providing you with information about goods and services that Exchange Solutions offer that we think may interest you, which may be based on inferences about your based on your activity on websites operated by Exchange Solutions or third parties.
- Customizing or enhancing your experience of our services, which may use inferences about your likely interests based on your activity on websites operated by Exchange Solutions or third parties.
- Measuring and understanding the effectiveness of our marketing communications we serve to you and others.

# • Service improvement and account management

- Ensuring that our content is presented in the most effective manner for you and your device.
- Administering our websites and demonstration applications and for internal business administration (for example, troubleshooting, data analysis, testing, research, statistical and survey purposes).
- Protecting our interests and those of third parties and as part of our efforts to keep our services safe and secure.
- Managing and operating your relationship with us.

### Legal basis for processing

Our legal basis for processing your personal information for the purposes described above will typically be one of the following:

• Contract.

It is necessary for us to process your personal information to perform a contract to which you or your company are a party, or to take steps at your request prior to you entering into a contract.

• Consent.

You have consented to us using your personal information for this purpose (for example, when you create an account with us or agree to receive marketing emails from us). You can withdraw your consent at any time by contacting us.

# • Legitimate Interests.

It is in our legitimate interests to use your personal information to operate, improve and promote our services (for example, when we customize your experience of our services or use your information for analytics purposes) and to protect our business.

# • Legal obligations.

It is necessary for us to use your personal information for Exchange Solutions to comply with a legal obligation.

# Sharing your personal information

We may share your personal information with third parties in the following circumstances:

• Our service providers: to help us run our business and perform services you request.

We may provide your personal information to our business partners, suppliers and subcontractors who provide services to us or where necessary to perform a service that you have requested such as SaaS based customer relationship marketing systems and internet security services.

• Advertisers and advertising networks: to serve relevant adverts to you and others.

We may provide your personal information to our partner advertisers and advertising networks that require that information to select and serve relevant adverts to you and others. We only share this information in a form that does not directly identify you.

• Analytics and search engine providers: to help us improve our services.

We may provide information about your visit to analytics and search engine providers to help us improve and optimise our services. We only share this information in a form that does not directly identify you.

We may also share your personal information with third parties for the following reasons:

• To obtain professional advice.

We may disclose your personal information to obtain professional advice (for example, from lawyers or financial advisors).

• To comply with a legal obligation.

We may disclose your personal information if required to do so by law or in response to a request from law enforcement or another regulatory authority. We may disclose your personal information to enforce our agreements with you or to protect the rights, property or safety of Exchange Solutions, its users or others. This includes sharing personal information for fraud prevention purposes.

### Storing your personal information

We transfer, store and process your personal information in Canada and the USA. Exchange Solutions is committed to protecting the information you provide.

By submitting your personal information, you agree to this transfer, storing or processing. We rely on approved data transfer mechanisms meeting industry accepted security and privacy standards to ensure that your personal information is adequately safeguarded at all times.

Unfortunately, transmission of information over the internet is never completely secure and beyond the control of Exchange Solutions. We will do our best to protect your personal information, but we cannot guarantee its security and any transmission is at your own risk. Any data transmitted over the Internet may be at risk; however, once it is received at Exchange Solutions and entered into our database, it has the same protection that Exchange Solutions extends to its own confidential information.

To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, this site has in place appropriate technological and business procedures to safeguard the information collected.

We keep your personal information for as long as is necessary for the purposes for which it is processed. These periods vary depending on the nature of the information and your interactions with us. You can request deletion of your information with Exchange Solutions at any time by contacting our Data Protection Officer.

# Dealing with children's privacy

The content of this site is not targeted to children nor does Exchange Solutions knowingly collect information from children. Exchange Solutions is committed to protecting the privacy needs of children. Parents and guardians are encouraged to take an active role in their children's online activities.

### Cookies

We use cookies and other similar technologies to distinguish you from other users of our websites and demonstration applications (including when you browse third party websites). This helps us to provide you with a good experience when you use our services (for example, to remember your login details and improve our services). We also use cookies and similar technologies to show you more personalized advertising, including Exchange Solutions ads on other websites. You may adjust the settings on your browser to refuse cookies but some of our services may not work if you do so. For detailed information on the cookies we use and why we use them, please read our Cookie Policy.

### Opting out of collection of information by third party advertisers

Our third party advertisers and advertising network providers ("Ad Providers") may provide you with ads on our websites, demonstration applications or on other websites. To make those ads more relevant and help measure their effectiveness, the Ad Providers may use cookies and similar technologies. They record your activity (including pages visited) and estimate what information interests you most. They use this information in accordance with their own privacy policies. Please check the privacy policy of any other website before submitting any personal information to it.

### Your rights

You have the right to ask us not to process your personal information for marketing purposes. You can do this at any time by updating your email preferences by contacting Exchange Solutions or by clicking on the "unsubscribe" link in any marketing email we send you. You can also opt out of marketing by emailing us at **marketing@exchangesolutions.com**.

Data protection law gives you the right to access your personal information, to object to the use of your personal information for certain purposes, and the right to erase, restrict or receive a machine-readable copy of your personal information. You can access, update and delete your Exchange Solutions account information by emailing dpo@exchangesolutions.com or contact us using our mailing address below.

We will handle your request in accordance with the law. This means there may be legal reasons why we cannot fulfil all requests.

# Links to third party websites

Our websites and demonstration applications may contain links to other websites. This privacy policy does not apply to those other websites and we do not accept liability for the content of any other website. Please check the privacy policy of any other website before submitting any personal information to it.

# Changes to this policy.

If there are updates to the terms of this Privacy Policy, the changes will be posted and the revision date in this document updated. This way you will always know how current this policy is, what information we collect through this site and how it is used. Your usage of this site following any such change constitutes your agreement to be bound by the Privacy Policy as changed. We make every effort to notify our contactable data owners when we make changes to our privacy policy, however it is suggested you also check back from time to time for updates.

### **Contact us**

If you have questions about this privacy policy or the way in which Exchange Solutions processes your personal information, you can contact us using the details below:

Post:

Data Protection Office, Exchange Solutions, Inc., 36 Toronto Street, Suite 1200, Toronto, Ontario, M5C 2C5

Email:

dpo@exchangesolutions.com