

## Privacy Policy

Updated March 5, 2021

ABC Intelligence Inc. (“**ABC Intelligence**”, “**we**”, “**our**”, or “**us**”) recognizes the importance of your right to privacy and wants you to be familiar with how we collect, use and disclose personal information that individually identifies you and our commitment to meet our obligations under applicable Canadian privacy laws.

This Privacy Policy explains how we collect, use, disclose and protect your personal information. It also explains how you can contact us if you have questions about how we handle your personal information. We will only collect, use and disclose your personal information in accordance with this Privacy Policy.

### 1. Acceptance of this Privacy Policy

This Privacy Policy is incorporated into and is subject to the ABC Intelligence General Terms and Conditions. By visiting or using the ABC Intelligence website (<https://abcintelligence.ai/>), or ABC Intelligence software, or ABC Intelligence application, (collectively the “**Website**”), and the ABC Intelligence services (the “**Services**”), you acknowledge that you have read and understood this Privacy Policy and that you agree to the terms and conditions of this Privacy Policy, and that you consent to the collection, use, disclosure and other processing of your personal information and other non-personally identifying information by ABC Intelligence in accordance with the terms and conditions of this Privacy Policy. If you do not agree to the terms and conditions of this Privacy Policy or the General Terms and Conditions, please do not provide us with any information and do not use the Website or Services.

### 2. Application of this Privacy Policy

This Privacy Policy applies to all personal information provided by visitors or users (“**visitors**”, “**users**”, or “**you**”) on the ABC Intelligence Website, in the ABC Intelligence software, inside the ABC Intelligence applications, emailed to ABC Intelligence, verbally communicated to ABC Intelligence, and any information that may be automatically retrieved through the use of the ABC Intelligence Website, the ABC Intelligence software and application, or the Services.

### 3. Changes to this Privacy Policy

We will update this Privacy Policy from time to time. Any changes will be posted on this page with an updated revision date. Please review our Website periodically for any changes to this Privacy Policy. Your continued access or use of the Website after any such changes constitutes your acceptance of the Privacy Policy as revised. If we make any material changes, we will provide notice through the Website or by other means.

### 4. Accountability

ABC Intelligence is accountable for compliance with this Privacy Policy and applicable Canadian privacy laws. We are responsible for personal information in our possession or custody as well as personal information that we may transfer to third parties for processing. We will require our service providers to agree to contractual requirements that are consistent with our privacy and security policies. We will require that our service providers are prohibited from using personal information, except for the specific purpose for which we supply it to them and to maintain a level of privacy protection comparable to our own privacy policies and practices.

## **5. What Personal Information We Collect**

As used in this Privacy Policy, personal information means information about an identifiable individual, whether or not in recorded form, within the meaning of applicable privacy laws. Anonymous data means data that is not associated with or linked to any individual's personal information or will not easily permit the identification of individuals ("**Anonymous Data**"). We do not consider personal information to include Anonymous Data.

The type of personal information we collect will depend on various factors such as the nature and purpose of our interaction, the type of products or services you may request or use, and any applicable legal and regulatory obligations. This information may include:

- contact information that allows us to communicate with or contact you (e.g., your name, home address, telephone number, e-mail or other electronic address, and fax number);
- identification information that allows us to confirm your identity (e.g., your name, date of birth, occupation, and government-issued identification);
- your actions on the Website (e.g., where you are clicking and how you are using the Website);
- relationship information that helps us to improve service and understand more about you (e.g., language and communication method preferences, or types of products, services or offers you may like); and
- IP address and referral source.

## **6. Aggregate Information**

We may track the total number of visitors to our Website, the number of visitors to each page of the Website, the number of External Website (defined below) pages you have visited, technical information about your computer, system and browser software and IP addresses. The aggregate information extracted from this data will be maintained, used and disclosed in aggregate form only and will not contain personal information. We may use such aggregate information to analyze trends, improve the Services we provide, administer the Website and gather broad demographic information for aggregate use.

## **7. When Your Personal Information is Collected**

We may collect your personal information when you voluntarily provide it to us by using our Website or Services or from third party sources. For example, we may ask you to provide personal information if you:

- Use our Website or Services;
- Send us a communication by email, telephone, online chat, fax, text message (SMS), the Internet, or by other means;
- Register to receive newsletters, articles or updates about our Services; or
- Otherwise participate in features of our Website or our Services that ask for personal information.

We may receive personal information about you from third party sources. We use this information to: (i) assist with our business operations; and (ii) to ensure that the Services that we provide you are delivered appropriately. You authorize the collection of your personal information from these sources

and, if applicable, you authorize these sources to give us your personal information for the above mentioned purposes.

If you speak with one of our representatives by email, telephone, online chat, fax, text message (SMS), the Internet, or by other means, you may be asked to provide personal information for the following reasons:

- To establish a record of the information that you provide;
- To take or verify instructions from you;
- To confirm your identity;
- To maintain quality service levels;
- To assist in staff training; or
- To facilitate our Services to you.

## **8. Purposes for Collecting Your Personal Information**

We collect, use and disclose your personal information in order to provide you with our Services. We also collect, use and disclose your personal information to comply with legal and regulatory requirements and as otherwise may be permitted or required by applicable laws. We will only use the personal information that we collect for the purposes for which it was collected. We may collect, use and disclose your personal information for any of the following purposes:

- To present our Website and its contents to you;
- To provide you with information, products, or Services that you request from us;
- To provide, activate and manage your access to and use of the Services;
- To process and fulfill a request, order, download, subscription, or other transaction;
- To verify and confirm your identity;
- To verify your instructions and decisions;
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it;
- To notify you about changes, updates and other announcements to our Website or Services we offer or provide through it or any other products and services;
- To provide technical, product and other support and to help keep the Services working, safe and secure;
- To establish and maintain commercial relations with you, including responding to your questions regarding our Services;
- To communicate with you by various methods including email, text (SMS), telephone and through our Website;
- To improve our Website, Services, other products, events, or services;
- To improve marketing, or customer relationships and experiences;
- To develop new products, services or benefits;
- To customize the appearance of the Website displayed to you and other personalisation to make the Services more relevant to your interests;
- To obtain your feedback regarding our Website and Services, including any surveys, user testing draws, sweepstakes, competitions and similar promotions;
- To track behavioural information on the Website to serve similar content upon future visits;

- To identify usage trends and develop data analysis, including for purposes of research, audit, reporting and other business operations, including determining the effectiveness of our promotional campaigns, evaluating our business performance, or in other ways;
- To support our business functions such as internal business processes, marketing and advertising;
- To deliver targeted advertisements, promotional messages, notices and other information related to the Services or other products and services and your interests;
- To notify you about other products, services or events provided by us, by affiliates, or third parties, which may be of interest to you;
- To comply with our legal obligations, meet regulatory requirements, resolve disputes, or enforce our agreements; and/or
- As otherwise permitted or required by law.

If a new purpose for using your personal information should develop, we will identify that purpose to you and request your consent before using it for such purpose, unless the new purpose is required or permitted by law.

## 9. Limiting Collection of Personal Information

We limit the collection of personal information to information that is necessary to fulfill the purposes identified in this Privacy Policy and we collect, use and disclose your personal information only in accordance with this Privacy Policy.

## 10. Consent, Limitation of Use, Disclosure

Your personal information will not be used without your consent for purposes other than those for which it was collected, or as required or permitted by law. Generally, we will seek your consent to use and disclose your personal information for identified purposes at the time of collection. In some circumstances, however, where we identify a new purpose after collection, we may seek your consent to use and disclose your personal information for such new purpose after it has been collected. Consent may be express or implied. Express consent may be given orally, electronically or in writing. Implied consent is consent that may reasonably be inferred from your action or inaction.

We may generate Anonymous Data from personal information collected through the Website and Services by removing information that makes the data personally identifiable to an individual. Such Anonymous Data includes, but is not limited to, information we collect from your use of our Website and Services. We may use this Anonymous Data and aggregated data for any reasonable purpose subject to applicable laws. We do not disclose this data to third parties.

We may also use and disclose your personal information including to service providers, data processors and other third parties (“**Third Parties**”) under the following limited circumstances:

- To Third Parties that assist with our operations and Website and Services including, without limitation, for customer services, our business operations, monitoring and analyzing Website activity, and operating and maintaining the Website. Such Third Parties may only use your personal information for the purposes described in this Privacy Policy.
- When necessary to protect (i) our safety, property, or other rights; (ii) our representatives, customers and users of the Website and stakeholders; (iii) to conduct investigations of possible breaches of law, including, including to detect and prevent fraud;

- To identify, contract, enforce or bring legal action against someone who may be violating an agreement that they have with us, including without limitation our General Terms and Conditions;
- To investigate breaches of security safeguards or cooperate with government or regulatory authorities pursuant to a legal matter;
- With your consent; or
- As otherwise required or permitted by law, regulation or other government authority or otherwise in cooperation with an investigation of a governmental authority.

We will not sell your personal information to any company or organization without your permission, except we may transfer your personal information and/or aggregate information to a successor entity upon a merger, consolidation or other corporate reorganization in which ABC Intelligence participates or to a purchaser of all or substantially all of ABC Intelligence's assets to which the Website or the Services relate.

### **11. Withdrawing Consent**

Subject to certain legal or contractual restrictions, you may withdraw your consent to the collection, use or disclosure of your personal information at any time upon giving us reasonable notice. We will inform you of the implications of doing so. For instance, withdrawing your consent may limit or prevent us from being able to provide or continue to provide you with certain products or services. In certain circumstances your consent cannot be withdrawn. For example, you may not withdraw your consent where our collection, use or sharing is required by law.

### **12. Electronic Marketing Communications; Canadian Anti-Spam Legislation (CASL)**

Subject to applicable law, from time to time, we may send you electronic communications notifying you of new and existing products or services, including special offers or promotions, that may be of interest to you. You may unsubscribe at any time from receiving our electronic marketing messages by clicking on the unsubscribe or opt-out link or following any other unsubscribe instructions included in any such message. Please allow at least up to 10 business days for the change to take effect. Please note that this will not limit our right to send you certain communications relating to your account or your existing products, services or transactions with us, or as otherwise permitted or required by applicable law, and these transactional account messages and other non-commercial electronic messages will not be affected by your choice to unsubscribe or opt-out from electronic marketing messages.

### **13. Retention of Personal Information**

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by law, regulation, or other government authority or for other essential purposes such as maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements. If you access the Services through a subscription administered or sponsored by your organization, we retain your organizational contact details after the termination of your organization's subscription to continue to communicate with you.

### **14. Storage, Processing and Transfer**

Your personal information may be stored, processed or transferred in Canada, or in any other country in which we, our service providers, and other parties with whom we share information under this Privacy

Policy may operate (which may include locations outside of Canada). In such event, your personal information may, while in another country, be subject to the laws of that country and may be accessible to courts, law enforcement and government or regulatory agencies in that country in accordance with such laws. By using the Website and/or Services, you agree to this Privacy Policy and you acknowledge this Privacy Policy may not offer an equivalent level of protection of that required in the European Union or other countries.

#### **15. Accuracy of Personal Information**

We will use our best efforts to keep personal information that is used on an ongoing basis and information that is used to make a decision about an individual as accurate, complete, and up to date as is necessary for the purposes for which it is to be used. While we take care to keep your personal information in our records as accurate, complete and as up to date as necessary for the purposes for which it is to be used, we rely on you to notify us when your information changes.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information held by us, we will correct or update the information as required. If we do not agree to amend or delete the personal information as requested by you, you may challenge our decision. We will make a record of this challenge, and, if necessary, disclose the challenge to any third parties to whom we have disclosed the personal information.

#### **16. Security**

We implement safeguards to seek to ensure a level of security appropriate to the level of sensitivity of the information we process. Our methods of protection may include physical measures (e.g., locked file storage and restricted access to offices), organizational measures (e.g., security clearances and limiting access on a need-to-know basis), or technological measures (e.g., the use of passwords, encryption, firewalls, secure socket layer). These measures are aimed at ensuring the integrity, confidentiality, and availability of personal information. We also require our outside service providers to provide a comparable level of protection to personal information that we may supply to them. We will exercise care in the disposal or destruction of personal information to prevent unauthorized access to the information.

#### **17. Access to Personal Information**

Upon written request, we will inform you of the existence, use and disclosure of your personal information and give you reasonable access to that information. We may deny access for legally permissible reasons, such as situations where the information is prohibitively costly to provide, if it contains references to other individuals, or where it cannot be disclosed for legal, security, or proprietary reasons, are subject to solicitor-client or litigation privilege, or in other circumstances prescribed by law. If there will be a charge to access your information, we will inform you of the approximate cost prior to providing access. In order to verify that the information is being released to the proper individual, you may be asked to provide suitable identification, or to otherwise identify yourself. We will advise you of any reason for denying an access request.

#### **18. Children's Privacy**

We do not knowingly collect information from children under the age of 13 or target the Services to children under 13.

## 19. Links to Third Party Sites

The Website may provide links to other websites or resources over which we do not have control (“**External Websites**”). Such links do not constitute an endorsement by ABC Intelligence of those External Websites. You acknowledge that we are providing these links to you only as a convenience, and further agree that we are not responsible for the content of such External Websites. Your use of External Websites is subject to the terms of use and privacy policies of the External Websites.

## 20. Cookies

A cookie is a small piece of text sent to your browser by a website you visit. It helps the website remember information about your visit, which can make it easier to visit the website again and make the website more useful to you.

Our Website may use “cookies” to enhance user experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Website may not function properly.

## 21. Third Party Analytics

We may use Google Analytics to help analyze how visitors engage with our Website. Google Analytics uses cookies to collect standard Internet log information (e.g. IP address) and to track visitor behaviour information (e.g. the web address of the page you visit), in an anonymous form. The information generated by Google Analytics about your use of the Website is transmitted to Google, Inc. and is processed to compile statistical reports on website activity for the Website. These reports would be used to evaluate aggregate visitor usage so that we can manage and improve the Website and its content to better meet our visitors’ needs. You may opt out of Google Analytics. For more information on opting out of being tracked by Google Analytics across websites you use, please visit <https://tools.google.com/dlpage/gaoptout>. For further information about Google Analytics, please refer to <https://policies.google.com/technologies/partner-sites>.

## 22. Filing Inquiries and Complaints

If you have any questions about this Privacy Policy, wish to request access to personal information about you in our possession or control, change your consent to the ways in which we may use or disclose your personal information, or have a complaint about our Privacy Policy or the manner in which we may have handled your personal information, please contact us in writing at:

**By email:** [privacy@abcintelligence.ai](mailto:privacy@abcintelligence.ai)

**By mail:** ABC Intelligence Inc., 1 Scarsdale Rd., Toronto, Ontario, M3B 2R2

We will investigate all written complaints and respond to all written inquiries. If we find a complaint to be justified, we will take appropriate measures to resolve it.

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