

PRIVACY POLICY

Last Updated: November 1, 2017

WORKOPS RESPECTS YOUR PRIVACY

This Privacy Policy describes how WorkOps Consulting Inc. (“WorkOps”, “we”, or “us”) collects and uses the information you provide to us, directly or indirectly, through our website workopsconsulting.com (the “Site”), including the WorkOps services that we offer (the “Services”). It also describes the choices available to you regarding our use of your Personal Information (as defined below) and how you can access and update that information. We are proud to demonstrate our commitment to your privacy, by complying with the laws and regulations under, and principles of, applicable privacy laws in Canada.

“Personal Information” is any information about an identifiable individual and includes information such as your name, address, telephone number, date of birth, email address, etc.. Information that cannot identify you, for example information that is aggregated and anonymized, is not considered Personal Information.

By accessing or using the Site and/or Services, you agree to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy. From time to time, we may make changes to this Privacy Policy. The Privacy Policy is current as of the “last updated” date which appears at the top of this page. Your continued use of our Site and/or Services following a change to this Policy means that you provide your consent to the collection, use and disclosure of your Personal Information as set out in the updated Policy. Please check back periodically for updates.

If you have any questions or concerns about our privacy practices and this Privacy Policy, please contact our Privacy Officer, Nigel Bunbury, at privacy@workopsconsulting.com.

This Privacy Policy applies to any information we collect or receive about you, from any source. This Privacy Policy does not apply to the collection, use and disclosure of Personal Information by other third parties whose web sites we may have linked to the Site. Like many other web sites, we offer links to other third-party web sites operated by entities other than WorkOps, and you should check the privacy policy of any linked web site to understand their privacy practices. These links are provided for your convenience only. We are not responsible for the content, products, services or information collection policies of such third-party web sites.

How do we use your Personal Information?

We collect your Personal Information for the following purposes necessary for you to use our Site and Services (the “Purposes”):

- a. to respond to any requests and queries you submit to us;
- b. to provide or perform any Services requested by you;
- c. to provide you with information about Services or promotions that may be of interest to you, if you have specifically requested to receive this information;
- d. to gather your opinion and feedback;
- e. to better understand how our clients use the resources provided on the Site;
- f. to improve the Site or our Services, including marketing communications;
- g. to tailor any interactive tools and better facilitate your use of the Site;
- h. for such other uses of Personal Information for which you provide your consent which are presented to you at the time of collection; and
- i. as otherwise permitted or required by law.

To whom do we disclose your Personal Information?

We may disclose/transfer your Personal Information:

- a. to our affiliates and related entities, to provide and improve the Services offered through the Site and for assisting us with providing our Services;
- b. to third party service providers (such as payment processors, auditors, service partners and analytics providers) with whom we have contractual agreements that includes appropriate privacy standards, where such third parties are assisting us with the services (for more information see below). For example, service providers may provide telephone support or data storage;
- c. to such persons for which you provide your consent; and
- d. as otherwise permitted or required by law.

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including without limitation subpoenas), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical. To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your Personal Information to third parties as part of legal process.

We may also make disclosures of Personal Information in the event our company undergoes fundamental changes, such as involving a potential acquirer and counterparties to the transaction including their professional advisors in connection with a transaction involving the sale of some or all of the business of WorkOps. These persons are required to maintain the Personal Information as confidential and any successor to our business may only use and disclose such information for those purposes for which you have provided consent to us. Following such fundamental change, you may contact the entity to which we disclosed your Personal Information with an inquiry concerning the processing of that information.

Occasionally, we may use service providers outside of Canada to process and/or store Personal Information for us. Please note that to the extent that any Personal Information is out of the country, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. Our Privacy Officer, whose contact information is provided above, can provide further information about our policies and practices regarding service providers located outside of Canada and further information about how these service providers, collect, use, disclose or store personal information on our behalf.

When and how do we obtain your consent?

We obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information for any purpose. You may provide your consent to us either orally, electronically or in writing. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the Personal Information and the reasonable expectations you might have in the circumstances. Implied consent occurs when we can assume you have given consent by some other action you have taken or decided not to take. For example, if you request specific information about our Services or otherwise use our Services and you provide us with Personal Information, we infer that you consent to us using such Personal Information reasonably to provide this information or provide you with the Service. In limited circumstances, we may rely on a third party to obtain your consent to the sharing of your Personal Information with us.

You can withdraw your consent to the collection, use and disclosure of your Personal Information at any time. However, if you choose to withdraw your consent, we may not be able to provide you with the full range of Services or our Site.

How do we collect your Personal Information?

A. Information You Submit to Us

Our Site includes a Contact Form that collects the contact information you directly submit to us (including your name and email address) so we can respond to your requests for information, Services, support or suggestions. For more information about how you can access, update or correct the information we have about you, please see the “How do I access, update or correct my Personal Information?” section below.

We may also collect information from you in connection with a co-branded offer, and in such cases, it will be clear at the point of collection who is collecting the information and whose privacy statement applies. In addition, it will also describe any choice options the individual has in regards to the use and/or sharing of personal data by the participant and its co-branded partner, as well as how to exercise those options.

B. Cookies and Other Tracking Technologies

Our Site also collects information passively through the use of cookies and/or other tracking technologies including beacons, tags and scripts. A “Cookie” is a text file that websites send to a visitor’s computer or other Internet-connected devices to uniquely identify the visitor’s browser or to store information or settings in the browser. Cookies make it more convenient as you use our Site. You can control the use of cookies or decline cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Site.

We and our service partners and/or analytics service providers use these technologies to analyze trends, administer the Site, track users' movements around the Site, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual or aggregated basis.

C. Protocol Data

As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, date/time stamp and/or clickstream data. We use this information gathered about you from our Site to help personalize search results, diagnose problems with our server, and to administer our Site. We also gather broad demographic information from this data to help us improve our Site and make your browsing experience more enjoyable.

Google Analytics

We use a tool called “Google Analytics” to collect information about use of this Site, such as how often users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google Analytics collects only the IP address assigned to you on the date you visit this Site, rather than your name or other identifying information.

Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Site. This cookie cannot be used by anyone but Google, Inc. The information generated by the cookie will be transmitted to and stored by Google on servers in the United States.

We use the information received from Google Analytics only to improve services on this Site. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this Site by [disabling the Google Analytics cookie](#) on your browser.

"Do Not Track" Signals

Note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit (www.allaboutdnt.com).

D. Data from Other Sources

We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. This helps us to update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you. If you provide us Personal Information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. Examples of this type of indirect collection may include information from our strategic partners and service providers. We do this to enhance our ability to serve you, to tailor our products and services to you, and to offer you opportunities to purchase products or services that we believe may be of interest to you.

E. Surveys

From time-to-time, we may provide you with the opportunity to participate in surveys. If you choose to participate, we may request certain Personal Information from you. Participation in these surveys is completely voluntary and you therefore have a choice whether or not to disclose the requested information. The requested information typically includes contact information (such as name and address), and demographic information (such as zip code or postal code). We use this information to monitor site traffic and to personalize our Site.

We may use a third-party service provider to conduct these surveys. When we do, that company will be prohibited from using our users' Personal Information for any other purpose. We will not share the information you provide through a survey with other third parties unless we give you consent to it.

How do we protect your Personal Information?

We use commercially reasonable security measures to protect against the loss, misuse or alteration of the information under our control. When you submit information to us throughout Contact Form, we encrypt the transmission of that information using secure socket layer technology (SSL).

WorkOps has implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification, including:

- a. that the only employees or authorized consultants who are granted access to your Personal Information are those with a business 'need-to-know' or whose duties reasonably require such information;

- b. premises security;
- c. deployment of technological safeguards such as security software and fire walls to prevent hacking or unauthorized computer access; and
- d. internal password and security policies.

We follow generally accepted standards to protect the information transferred to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions or concerns about the security of your personal information, you can contact us at privacy@workopsconsulting.com.

Contacting You

From time to time, WorkOps or someone acting on behalf of WorkOps may contact you to send information and to provide you with offers for Services. The contacts may occur by e-mail, telephone or text message. In accordance with applicable law, and where you have provided valid consent, you may receive marketing communications from or on behalf of WorkOps. For example, we may present to you a co-branded offer with a service partner. You understand that providing consent to receive such communications is never a condition of purchasing any Services from WorkOps and you can opt-out of receiving these communications at any time.

Under Canada's Anti-Spam Legislation, if you have engaged WorkOps Services we have your implied consent to send you electronic messages unless you notify us otherwise. You may do this by using the unsubscribe feature we include in any electronic message we send you or by contacting us at privacy@workopsconsulting.com.

Referrals & Minors

If an existing client elects to refer another organization or individual to our Site, we ask the client for that organization or individual's name and email address. WorkOps will send the referee a one-time email inviting them to visit our Site. WorkOps stores this information for the sole purpose of sending this one-time email. The referee may contact WorkOps at privacy@workopsconsulting.com to request the removal of this information from our database. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at privacy@workopsconsulting.com.

Our Site is not intended to solicit information of any kind from individuals under the majority in their jurisdiction of residence ("Minors") without the required consent from their parents/guardians. If we become aware of any information we possess that may belong to a Minor, we will immediately obtain parental consent to delete this information from our servers. If you are a parent/guardian and you suspect that your child may have submitted Personal Information to us, please contact us at privacy@workopsconsulting.com.

How long will we utilize, disclose or retain your Personal Information?

We may keep a record of your Personal Information, correspondence or comments in a file specific to you. We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law. We have established minimum and maximum retention periods and procedures for maintaining and destroying your Personal Information.

We receive and store any information you enter on our Site, or give us in any other way, including through email, telephone, or other communications with our consultants. If you contact us for support, we will

keep an internal record of what support was given. We will retain and use your personally identifiable information as necessary in order to comply with our legal obligations, resolve disputes, or enforce our agreements.

How do I access, update or correct by Personal Information?

You have a right to review any of the information that we hold about you and learn about how we have used it or to whom we have disclosed it by contacting us. Subject to any exceptions prescribed by law, you can access, update, correct or request deletion of the Personal Information we have about you or process on behalf of a third party and challenge its accuracy and completeness. You can request this by contacting us at any of the addresses below:

- i You may send mail to 1 King St W, Suite 4800, Toronto, ON, M5H 1A1;
- ii You may call us at 1 (844) WORKOPS (967-5677); or
- iii You may send an email to privacy@workopsconsulting.com.

We will respond to your request for access or to modify or deletion of your information within thirty (30) days and attempt to respond to each of your written requests for access or to modify or deactivate your information not later than thirty (30) days after we respond. We will advise you in writing if we cannot meet your requests within this time limit. However, we may deny access when required or authorized by law. For example, we may deny access when granting access would have an unreasonable impact on other people's privacy or when necessary to protect our confidential commercial information and the requested information cannot be severed from the balance of the record in which it is contained. If we deny your request for access to, or refuse a request to correct information, we shall explain why.

If you are dissatisfied with how we have handled your request, please contact us and we will make every reasonable effort to resolve the issue. If you remain dissatisfied, you have the right to make a complaint to the federal Privacy Commissioner or your provincial privacy commission in respect of the privacy concern.

Contacting Us

If you have any questions about our Privacy Policy, the practices of this Site, or your dealings with this Site or Services, please contact our Privacy Officer at privacy@workopsconsulting.com or write to us at:

WorkOps Consulting Inc.

Attention: Nigel Bunbury
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Toronto, Ontario, Canada
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