



PASON WEBSITE PRIVACY POLICY

PLEASE READ THE FOLLOWING CAREFULLY

1. Introduction

This document describes how Pason Systems Inc. and its parent, subsidiaries and affiliates (collectively, “Pason”, “we”, “our”, or “us”) collect, use and process the personal information of individuals (“you” or “your”) who visit any Pason website or use any Pason application, including mobile and browser apps and software (the “Websites and Apps”).

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person. Personal information does not include business contact information, including your name, title, or business contact information.

The Websites and Apps may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

2. What information do we collect about you?

Pason and third parties working on our behalf may collect a variety of information about you, depending on your use of our Websites and Apps. This information may include personal or business-related information such as your first and last name, company name, job title, mailing address, email address, phone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier.

We may also collect:

- (a) non-identifying information such as demographic, statistical or aggregated information, which may be derived from personal information.
- (b) technical information, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Websites and Apps, and usage details.
- (c) Information about your interactions with our Websites and Apps, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Websites and Apps (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our customer service number.

3. How do we collect this information?

On our Websites and Apps, Pason and third parties working on our behalf may also place, view, and/or use “cookies,” web server logs, web beacons and other electronic tools to collect information about your use of our Websites and Apps. We also collect the content, communications and other information you provide when you use our Apps and other products. This can include information in or about the content you provide (like metadata), such as the date a file was created.

Can you disable cookies?

You can delete and disable cookies. Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. You must do this for each browser you use and on each device. However, please note if you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of your website experience will not function properly.

4. How do we use your information?

We use information that we collect about you or that you provide to us:

- (a) to provide access to our products, services and customer support, and to assist with the technical functioning of our Websites and Apps;
- (b) to provide you with information, products, or services that you request from us;

- (c) to carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements;
- (d) to notify you about changes to our Websites and Apps or any products or services we offer or provide through it;
- (e) to improve our Websites and Apps, products or services, marketing, or customer relationships and experiences;
- (f) to answer your questions, queries or complaints;
- (g) for business purposes, including creating new data sets based on anonymized and aggregated data. Aggregated information is also used to collect and spot trends in application usage. We may disclose information on an anonymized and aggregated basis to third parties, without restriction. Efforts will be made to ensure that individual companies will not be recognizable in these aggregate statistics; and
- (h) for any other purpose with your consent.

5. Do we share your personal information with third parties?

We may share certain information, including your personal information, with third parties for the following reasons:

- (a) to service providers and other third parties we use to support our business and who are contractually obligated to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- (b) to comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law;
- (c) to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings;
- (d) to enforce or apply our [Terms of Use](#) and other agreements, including for billing and collection purposes;
- (e) in connection with a sale or other transfer of all or some of the assets of Pason and/or in connection with a sale or merger of Pason or any division of Pason;
- (f) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Pason, our customers, or others;
- (g) to fulfill the purpose for which you provide it; and
- (h) with your consent.

We do not sell your personal information to any third party.

6. What protections are provided by third parties with whom we share your personal information?

Pason uses a limited number of third-party service providers to assist us in providing our services to customers. These third-party providers offer customer support to our customers, perform database monitoring and other technical operations, assist with the transmission of data and provide data storage services. These third parties may access, process, or store personal data in the course of providing their services.

7. How do we protect your personal information?

The security of your personal information is very important to Pason. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites and Apps, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Websites and Apps. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Websites and Apps.

8. How long do we retain your personal information?

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

9. Does Pason transfer your personal information across borders?

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country.

By submitting your personal information or engaging with the Websites and Apps, you consent to this transfer, storage, or processing.

10. Does Pason collect information of children?

Our Websites and Apps are not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Websites and Apps. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Websites and Apps, make any purchases through our Websites and Apps, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@pason.com.

11. How can you access, review, correct, delete or withdraw consent to the use of your personal information?

To request access, review, correct or delete information we have about you, please contact us at privacy@pason.com

Please include the following information in all requests: first name, last name and email address. While Pason will make reasonable efforts to fulfill your request, we may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Again, if you have any concerns or questions, please contact us at legal@pason.com.

If you disagree with this Privacy Policy or want to withdraw consent, please contact us at legal@pason.com. If you do not agree with any of the terms and conditions of this Privacy Policy, you must immediately cease using and accessing Pason's Websites and Apps, products and services.

12. Is this Privacy Policy likely to change?

Pason is constantly reviewing its privacy policies in the light of ongoing regulations and user needs and issues. Pason therefore reserves the right to modify this Privacy Policy at any time by posting the revised version on our Websites and Apps and updating the effective date. We encourage you to check the website frequently to see the current Privacy Policy in effect and any changes that have been made to it.

13. Contact Information and Challenging Compliance

We welcome your questions, comments, and requests regarding this Privacy Policy and our privacy practices. Please contact us in writing at:

Legal Department
Pason Systems Corp.
6130 – 3rd Street S.E.,
Calgary, Alberta, Canada T2H 1K4

or

legal@pason.com

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this Privacy Policy, and with applicable privacy laws. To discuss our compliance with this Privacy Policy please contact our Legal Department using the contact information listed above.

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