



# WEMBLEY PARTNERS LTD.

## PRIVACY POLICY

Last modified: August 3rd, 2020

Wembley Partners Ltd. (“**Wembley**”, “**we**”, “**our**”, “**us**”) recognizes the importance of your right to privacy and wants you to be familiar with how we collect, use and disclose any 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 when you use our website and our mobile site (collectively, the “**Site**”) and our services, including Wembley’s consulting services and its AEGIS platform (collectively, the “**Services**”). This Privacy Policy is incorporated into and forms part of our Terms of Use, which outline the terms and conditions you agree to when using our Site and Services. We will only collect, use and disclose your personal information in accordance with this Privacy Policy.

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.

This policy applies to information we collect, use, or disclose about you:

- Through our Site.
- Through our Services
- In email, text, and other electronic messages between you and this Site and our Services.

The Site includes 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.

This policy DOES NOT apply to information that:

- You provide to or is collected by any third party, through any application or content that may link to or be accessible from or on our Site or related to the Services.
- Does not directly or indirectly reveal your identity or directly relate to an identified individual, such as, information about your business information, demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from Personal Information. For example, we may aggregate Personal Information to calculate the percentage of users accessing a specific Site or Service feature. We may use this statistical data and aggregated data for any purpose and disclose such data to third parties in our sole discretion.
- Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using this Site, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time. Your continued use of this Site after we make

changes indicates that you accept and consent to those changes, so please check the policy periodically for updates. If you do not agree to the terms of this Privacy Policy, please do not use our Site or Services or supply your personal information to us.

## **1. INFORMATION WE COLLECT ABOUT YOU**

We collect and use several types of information from and about you, including:

- **Personal information**, that we receive through the Services or used to identify you or your clients such as your name, date of birth, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier and billing and account information ("**personal information**"). We may also receive personal information from relating to your employees, contractors, customers or agents who in the course of providing our Services, such as conducting penetration testing or a systems audit (or similar activity) for a client.
- **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 Site or Services, and usage details.

## **2. HOW WE COLLECT INFORMATION ABOUT YOU**

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us** through our Site or when we provide our Services, for example, by creating an account with us, when using our Services, filling in forms or corresponding with us by phone, email, or otherwise.
- **Automated technologies or interactions**, as you navigate through our Site and use our Services. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- **Third parties or publicly available sources**, for example, our business partners when you provide these partners with your information in connection with the Services or for verification purposes.

### **A. Information You Provide to Us**

The information we collect directly from you on or through our Site or Services may include:

- Information that you provide by using our Site or our Services. This includes information provided at the time you enter into a commercial arrangement with us for our Services or requesting further services. We may also ask you for information when you report a problem with our Site or Services.
- Records and copies of your correspondence (including email addresses), if you contact us.

In using the Services, including any consulting engagements, you may provide us with personal information of third parties. You must only provide us with the personal information of a third party if you have obtained consent to do so in accordance with applicable privacy laws. You represent that you will only provide us with personal information of a third party if you have obtained consent to do so in accordance with applicable privacy laws.

### **B. Information We Collect Through Cookies and Other Automatic Data Collection Technologies**

As you navigate through and interact with our Site, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Site, including location data, logs and other communication data and the resources that you access and use on the Site.
- Information about your computer, mobile device and internet connection, including your IP address, make and model of device, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal and we may maintain it or associate it with personal information we collect in other ways that you provide to us, or receive from third parties. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- Store information about your preferences, allowing us to customize our Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Site.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.
- **Flash Cookies.** Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings that are used for browser cookies.
- **Web Beacons.** Pages of our Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Wembley, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

The only way to completely opt out of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device. Please refer to your mobile device or browser's technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. (To learn more about cookies, clear gifs/web beacons and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative's online resources, located at <http://www.networkadvertising.org> ). Depending on your type of device, it may not be possible to delete or disable tracking mechanisms on your mobile device. Note that disabling cookies and/or other tracking tools prevents Wembley or its business partners from tracking your browser's activities in relation to the Service. However, doing so may disable many of the features available through the Service.

Our Site uses third party analytics services such as Google Analytics, a web analytics service of Google, Inc. ("**Google**"). Google Analytics uses "cookies" to analyze how you use our Site. The information generated by the cookie about your use of our Site (including your IP address) is sent to a Google server in the U.S. and stored there. Google will use this information to evaluate your use of our Site, compile reports on Site activity for our Site operators and to provide other site activity related internet services. Additionally, Google may transfer this information to a third party when required by law or in the case of a third-party processing information on Google's

behalf. In no case will Google use your IP address in connection with any other information held by Google. By using our Site, you consent to the processing of data about you collected by Google in the manner described and for the above mentioned purpose. The consent for collection and storage of data can be withdrawn at any time in the future by clicking on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en.consent>

### **3. HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Site and its contents to you.
- To provide you with information or Services that you request from us.
- 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 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.
- To follow your participation in activities through the Services, and for certain users, to track the location of any shipments transported through the Services;
- To notify you about changes to our Site, or Services we offer or provide through it.
- To improve our Site or Services, marketing, or customer relationships and experiences.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

### **4. DISCLOSURE OF YOUR INFORMATION**

We may disclose non-personal information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Wembley's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Wembley about our customers and users is among the assets transferred.
- To contractors, service providers, and other third parties we use to support our business (such as providers of verification services and remittance services who assist us in the provision of the Services) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it to us.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.



- To enforce or apply our General Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Wembley, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **5. TRANSFERRING YOUR PERSONAL INFORMATION**

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

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. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

You are welcome to contact us to obtain further information about our policies regarding service providers outside of Canada.

By submitting your personal information or engaging with the Site or using our Services, you consent to this transfer, storage, or processing.

## **6. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Site may not be accessible or may not function properly.
- **Promotional Offers from Wembley.** If you have opted in to receive certain emails from us but no longer wish to have your email address used by Wembley to promote our products or services, you can opt-out by sending us an email stating your request to [info@wembleypartners.com](mailto:info@wembleypartners.com). If we have sent you a promotional email, you may unsubscribe by clicking the unsubscribe link we have included in the email. This opt-out does not apply to information provided to Wembley as part of the provision of the Services to you

## **7. DATA SECURITY**

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers.

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 Site or Services, you are responsible for keeping this password confidential. You agree that you shall 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 Site or through our Services. 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 Site.

## **8. DATA RETENTION**

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. MINORS**

Our Site and Services are not intended for children under 18 years of age. No one under age 18 may provide any information to the Site or use the Services. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Site or on or through any of its features/register on the Site, or the Services. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at [info@wembleypartners.com](mailto:info@wembleypartners.com).

## **10. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important that the personal information we hold about you is accurate and current and we will endeavor to ensure your information is correct. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

If you want to request to review, verify, correct, or withdraw consent to the use of your personal information you may also send us an email at [info@wembleypartners.com](mailto:info@wembleypartners.com) to request access to, correct, or delete any personal information that you have provided to us. In certain instances, we cannot delete your personal information except by also deleting your user account with us. 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 not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege.

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.

We will endeavor to provide access to your personal information as required under applicable privacy laws, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions include:

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that is about another individual that would reveal their personal information or confidential commercial information.

- Information that is prohibitively expensive to provide.
- If you are concerned about our response or would like to correct the information provided, you may contact our Privacy Officer at the address below.

### **11. WITHDRAWING YOUR CONSENT**

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact our Privacy Officer at the address below. Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

### **12. CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account or through a notice on the Site.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Site and this privacy policy to check for any changes.

### **CONTACT INFORMATION AND CHALLENGING COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact our Legal and Privacy Counsel via email at [legal@wembleypartners.com](mailto:legal@wembleypartners.com) or our Customer Service at [info@wembleypartners.com](mailto:info@wembleypartners.com).

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