

CALIBER Privacy Policy

Last updated: [May 16th, 2022]

CALIBER QUALITY SOLUTIONS INC. (“CALIBER” or “we” or “our”) maintains the content found and published at <https://www.caliberqa.com/> and such other locations on the internet as made available from time to time by us (the “Website”) as a service to you. In this Privacy Policy, “you” or “your” means an individual who is using the Website. The Website contains provides information related to CALIBER’s services (the “Services”).

CALIBER respects your privacy and is committed to maintaining the privacy, accuracy and security of your Personal Information in accordance with applicable privacy legislation, including the *Personal Information Protection and Electronic Documents Act* (PIPEDA) as amended by the Digital Privacy Act (“DPA”), and best industry practices. We have posted this Privacy Policy to let you know what information we collect, how it is handled and with whom it be may be shared. This Privacy Policy is limited to information we collect through the Website and the Services.

Accountability

We train our employees to manage your Personal Information properly and have designated an individual as Chief Privacy Officer who is accountable for compliance with this Privacy Policy.

Collecting Information

Our team is committed to protecting your privacy, we collect information only by lawful and fair means and not in an unreasonable or obtrusive way.

We collect the following two types of information via the Website and in providing our Services:

- (a) “**Personal Information**” which is information about you, as an identifiable individual, that is protected by applicable privacy legislation; and
- (b) “**Non-Personal Information**” which is any other information that we collect from you or that you provide to us via the Website and in the course of the Services or that we collect based on your use of the Website but excluding Personal Information and any information that is publicly available.

(collectively, the “**Information**”).

Although the use of certain Non-Personal Information collected, used or disclosed through the Internet as described herein is not restricted by applicable privacy legislation (and notwithstanding anything to the contrary, to the extent that such is the case, the obligations under this Privacy Policy do not apply to such information in our sole discretion), we provide information in this Privacy Policy about our collection and use of such information for the sake of transparency with respect to the operation of the Website.

Contact Us: We collect Personal Information such as your name, email address and phone number when you contact CALIBER via the Website. We may also collect Non-Personal Information about your business, such as your company name and whether you are a manufacturer or contractor at such time.

By submitting Information to us, you agree that we may use or disclose such Information in accordance with this Policy and as permitted or required by law. We do not, however, sell your Information to others.

Log Data: Our servers automatically record information (“**Log Data**”) related to your actions on the Website. Log Data may include information such as your IP address, browser type, internet service provider, date/time stamps, the referring domain, pages visited, and search terms. Other actions, such as interactions with Website may be also included in Log Data. Log Data may also be recorded by third party websites.

Links: The Website may keep track of how you interact with links by redirecting clicks or through other means. We do this to help improve our Services, and to be able to share aggregate click statistics such as how many times a particular link was clicked on. The Website may also use tracking technologies such as web beacons, tags and pixels to record information about how you browse the Website.

Cookies: Similar to other websites, our Website uses a standard technology called “cookies” to collect information about how the application is used. A cookie is a small piece of information that is sent by a website and stored on your device and contains information needed to interact with a user. We use cookies to help us provide you with better service by tracking your preferences. If you disable or refuse to accept cookies, you may not be able to access and use the Website.

Use and Disclosure of Your Information

We may use and disclose your Information for the following purposes:

- to identify you;
- to provide the Website and ongoing customer service to you;
- to improve our services and business;
- to communicate with you, including your feedback and responding to your requests for information;
- to protect the security and integrity of our business;
- to perform statistical analysis about use of the Website;
- to satisfy applicable legal and regulatory requirements;
- to detect and prevent fraud; and
- to achieve any other purposes as may from time to time be permitted by law.

We may share your Information with service providers that help with our business operations, such as website hosts and management companies, third party payment processors, and marketing services providers.

In the event that we are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your Information may be disclosed or transferred as part of that transaction.

We may also share aggregate and/or non-identifiable Information with third parties, including, but not limited to, advertisers and investors.

Except where collection, use or disclosure of Information may be justified or permitted or where we are obliged to disclose such information without consent, we will not use or disclose your Personal Information for purposes other than those for which it was collected as set out above. Such circumstances where disclosure is justified, permitted or required include situations where:

- the information is publicly available;
- it is impossible or impractical to seek consent;
- we are required by law or by order of a court or tribunal;
- we believe, upon reasonable grounds, that there is an imminent risk of death or serious bodily harm to an identifiable person or group; and
- it is necessary to collect outstanding fees owing to CALIBER by the individual whose Information is to be disclosed.

Consent to Collection, Use and Disclosure

By submitting Information to us or our agents, you agree that we may collect, use and disclose such Information in accordance with this Privacy Policy and as permitted or required by law and explicitly consent to such collection, use and disclosure.

Subject to legal, regulatory and contractual requirements, you may refuse to consent to our collection, use or disclosure of Information, or you may withdraw your consent to our further collection, use or disclosure of your Information at any time by sending written notice to us at the email address listed below under “Requests for Access and Complaints”. If you choose not to provide Information or to withdraw your consent, you may not be able to use certain features of the Website and it may severely limit our ability to provide you with the requested Services.

We will act on your instructions as quickly as possible, but there may be certain uses of your Information that we may not be able to stop immediately.

Access to, and Accuracy of, Personal Information

You have the right to request access to your Information we have on record. Requests for access to your Information may be sent to the email address listed below under “Requests for Access and Complaints”. Upon our receipt of an email request from you for access to your Information, and subject to any applicable exemptions, we will inform you of the existence, use, and disclosure of your Information and will give you access to that information and the opportunity to correct any inaccurate Information that is in our possession. Detailed requests which require archive or retrieval costs may be subject to your payment of costs and expenses incurred by us in retrieving same. Access to Information may be denied when:

- denial of access is required or authorized by law;
- information relates to existing or anticipated legal proceedings against an individual to whom the information relates;
- granting access would have an unreasonable impact on another person's privacy; or
- the request is frivolous or vexatious.

We rely on you to help us keep your Information accurate and complete. You can access or update your Information by contacting us at the email address listed below, identifying your contact information, the information you are requesting access to, and your requested changes.

If we deny your request for access to, or refuse a request to correct Information, we will explain why.

Safeguarding Personal Information

The security of your Information is one of our top priorities. In that regard, we have implemented appropriate administrative, technical and physical security procedures to help protect Information. Password protocols, access restrictions, firewalls and data encryption are used to protect Information.

While we do our very best to protect your Information, we cannot guarantee the security or confidentiality of the Information transmitted. We cannot ensure or warrant the security of any information you transmit to us via the Website or otherwise; any transmission is at your own risk.

Openness

We are committed to providing you with understandable and readily available information on our policies and practices related to management of your Information.

Links

Our Website may contain links to other websites which may have privacy practices and policies that differ from our own. When you leave our Website by using these links, you are subject to the privacy and security policy of those websites. We are not responsible for the content or practices of any linked website. We recommend that you review the privacy policy of any website that you access through our Website. The inclusion of a link to a third-party website on our Website should not be construed as our endorsement of such website.

Retention of Information

Information is retained only as long as is reasonably necessary or relevant for the purposes identified above or as required by law. We may retain certain data as needed to prevent fraud or for other legitimate business purposes. Any retained Information remains subject to this Privacy Policy. Once Information is no longer reasonably necessary or relevant for the above-noted purposes, or as required by law, your Information will be destroyed, erased or de-identified.

Changes to our Privacy Policy

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your Information and will be located on this page unless we notify you otherwise. If we make a change to this policy that, in our sole discretion, is material, we will notify you via e-mail if known. Please check this page periodically for updates. By continuing to access or use the Website after those changes become effective, you agree to be bound by the revised Privacy Policy.

Requests for Access and Complaints

If you have additional questions, or wish to access, update or correct inaccuracies in your Information, email us at ajouk@caliberqa.com.

We will respond to your questions, concerns and complaints regarding this Privacy Policy in a timely manner. If you are not satisfied with our response to a privacy related matter, you may contact the office of the Privacy Commissioner of Canada.