

## Privacy policy

At **2398570 Ontario Inc.** ("PiinPoint "), your right to privacy is very important to us. We provide you with the ability to access, analyse, and create reports relating to potential business sites, organized to show the best potential sites based on the available data. In order to provide you with this service effectively, we collect certain specific information from you, and we also automatically collect information and data relating to the usage of our services by all our users, including you. Because we are committed to protecting your privacy rights and the information you provide to us, we have developed this privacy policy. It explains how we will protect your information and describes how we will use and share it.

This policy is concerned with the protection of your personal information only. Personal information includes any data that can be used to identify you as an individual, including your name, income, personal opinion, interests, home contact information, identification numbers, user IDs, passwords, ethnic origin, and age. Under Canadian law, in a business context, personal information does not include the name, job title, business address, or business telephone number of any employee in an organization.

This policy describes the following practices:

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- Collecting information
- Sharing your personal information
- Maintaining your personal information

This privacy policy may change from time to time to reflect PiinPoint's internal needs, customer feedback, or changes in applicable privacy legislation. PiinPoint will post all such changes on our website, so please visit this page regularly.

NOTE: PiinPoint software and services are not intended for children under the age of 13. We do not knowingly collect or maintain any personal information or non-personally-identifiable information from anyone under the age of 13 nor is any part of our website, software or service directed to children under the age of 13. We will close any accounts used exclusively by such children and will remove and/or delete any personal information we believe was submitted by any child under the age of 13.

### **Collecting information**

In order to use the services provided by PiinPoint, you will be required to provide specific information about yourself, such as your name, address, and e-mail address. We will always inform you when we need information that personally identifies you, and we will keep this information in strict confidence. Additionally, you may, on occasion, voluntarily provide PiinPoint with information that can be classified as personal information – all such personal information will be stored and maintained in accordance with this privacy policy.

We collect information about you in the following ways:

#### **As part of your registration for, or use of, PiinPoint's software and services**

We will require your name, address, telephone number and credit card information for billing purposes. You may also provide information voluntarily about yourself that may fall within the definition of personal information under applicable law, and, in the course of using the services to find optimal business locations, your search criteria may reveal certain information about you. All of this information is kept confidential and stored securely by PiinPoint.

#### **Automatically by PiinPoint's software and services**

PiinPoint's software and services contain features that automatically collect information from users, such as usage statistics, and other tracking information. Although this information will not identify you personally, it nevertheless provides certain information about you, and we therefore treat it as personal information. Additionally, use of PiinPoint's website and/or software may result in the collection of technical information such as your computer's IP address, operating system, browser name/version, the referring web page, requested page, date/time, and sometimes a "cookie" (which can be disabled using your browser preferences); such information is used to help us understand the overall usage pattern of our website and software.

**You contact PiinPoint directly**

Customers and business partners often contact us directly. When you contact any PiinPoint employee by telephone, e-mail, in person, or through our website, you will be asked to provide consent to the collection of personal information if your personal information will help us deliver the information, products, or services you require.

**You respond to communications from PiinPoint**

From time to time, PiinPoint may invite you to provide us with information for specific purposes. We may ask for this information through feedback features on our website or software; we may send out e-mail inviting feedback or offering products and services; or we may ask you for information concerning support of our products or services. Your response to these communications may require you to submit personal information and opinions.

**Your information is obtained through a third party**

Occasionally, PiinPoint will obtain information about you from third parties, such as mailing list providers, third party service providers, ISPs, or third party application or account providers. Third-party providers are responsible for obtaining consent for the release of personal information to us from those individuals identified on mailing lists, surveys, or through other collection methods.

**Sharing your personal information**

Subject to any exceptions stated above in the collection of information section, should PiinPoint collect any of your personal information, we will follow these practices regarding the distribution of that information.

**Your personal information is always protected**

PiinPoint uses reasonable precautions to protect your personal information and store it securely. Access to your personal information is restricted to those personnel who need it, and PiinPoint takes reasonable steps to prevent the unauthorized use or disclosure of your personal information.

PiinPoint only uses and discloses your personal information if it helps us facilitate your needs, improve our products and services, meet legal and regulatory requirements, or — to the limited extent possible — manage our internal business operations. Additionally, if there are any disclosure or use restrictions in your consent to the collection of your personal information, PiinPoint will abide by those restrictions (subject to the consent exceptions listed below).

PiinPoint may combine your information with other information into an aggregate form, so your information no longer personally identifies you. We may then disclose the aggregate information to third parties, so they can obtain an overall picture of PiinPoint's products, services, and/or usage patterns.

**We only share your information with your consent**

PiinPoint provides your information to third parties only for purposes to which you have consented, and we require such third parties to keep your information confidential.

In a few situations, PiinPoint may be required to disclose your information without your prior consent. For example, PiinPoint may disclose your information if we are required to do so by law, or if we believe in good faith that such disclosure is necessary to:

- comply with law or legal process
- protect and defend our rights and property, or the rights and property of a third party
- protect against misuse or unauthorized use of any of PiinPoint's products, software, services, or other proprietary materials
- protect the personal safety of any person
- allow for a change of ownership of PiinPoint and associated transfer of all personal information to the new owner of PiinPoint – this does not affect the protection of your information under this Privacy Policy

PiinPoint will always try to provide you with prior notice of such disclosure; however, such notice may not always be possible or reasonable given the circumstances.

## **Maintaining your personal information**

PiinPoint has established the following practices regarding the maintenance of your personal information.

### **You can request access to your personal information at any time**

If, for any reason, you wish to review your personal information that PiinPoint has in its possession, you can contact our Privacy Officer, who will be pleased to provide you with all your personal information that PiinPoint has on file.

### **You can request changes to your personal information at any time**

Sometimes, it will be necessary for you to update your personal information PiinPoint has on file. For example, if you are obtaining a service for which you are paying by means of a credit card on file with PiinPoint, and you change credit cards, you must update your information in order to keep receiving the services provided by PiinPoint.

If you wish to make any changes or corrections to your personal information, please contact our Privacy Officer who will implement the changes. This will help us ensure our records are always up-to-date.

### **You can opt out of communications at any time**

Additionally, you always have the choice of whether you wish to receive information from PiinPoint. If you do choose to opt out of communications respecting products and services provided by PiinPoint, you may not obtain all the benefits we could otherwise provide, such as updates or warnings. PiinPoint will not have any liability to you for your loss of those benefits or any negative effects respecting your use of PiinPoint's products or services.

### **You can request that your personal information be destroyed at any time**

A situation may arise where you desire to have all of your personal information that is contained in PiinPoint's records deleted or destroyed. If this is what you wish, please contact our Privacy Officer, who will take care of removing your personal information from all of PiinPoint's records. However, there may be situations where we are obligated to retain one archival copy of your information to allow us to comply with laws or respond to legal processes. We will inform you of all such situations, and will only use your retained personal information to the limited extent necessary to comply with such laws or respond to legal processes.

## **Contacting our Privacy Officer**

PiinPoint welcomes your comments about this privacy policy, and we would be happy to provide any additional information you require. Please contact our Privacy Officer at:

**Jim Robeson**

**Email: [jim@piinpoint.com](mailto:jim@piinpoint.com)**

**Phone: 1 (519) 897.4708**

*This privacy policy supplements any agreements you already have with PiinPoint Inc., such as the Terms of Use, website terms and conditions, and any other software license agreement. Our privacy policy does not replace the terms of those agreements. By agreeing to those terms and using PiinPoint's website, products, software and services, you are consenting to the collection and use of your personal information by PiinPoint Inc. in accordance with this privacy policy. This policy was written in accordance with the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA).*