

CA Privacy Policy

This Privacy Policy discloses how we gather, use, and protect your personal data.

This Privacy Policy applies to personal data collected by Compliance Associates through its website www.complianceassociates.caor, as described below, by other means during the course of its business.

1. Controller

Responsible data controller is:

Capex Inc. 5160 Explorer Drive, Mississauga, ON Canada; Phone: 905-738-3773; E-Mail: info@complianceassociates.ca; Website: www.complianceassociates.ca

2. General Information

During the course of carrying out our business and performing our services, Compliance Associates collects personal data to conduct our business, provide and market our services, and meet our legal obligations. Likewise, we may also collect personal data for other purposes, which we would describe in more detail to you at the point we collect the personal data.

You may refuse to provide us with some or all of your personal data; however, this may limit the ways in which we can interact with you, including providing you with our services.

Your Rights

You have the following rights:

- Right of access: you have the right to request a copy of your personal data.
- Right to rectification or erasure: you have the right to have incorrect personal data corrected, or request your data be deleted in some circumstances.
- Right to restriction of processing: you have the right to prevent further processing for the time being if

certain requirements are met.

- Right to object: you have the right to object to processing in some circumstances.
- Right to data portability: you have the right to receive your personal data in a machine-readable format in order to forward it or have it forwarded to another controller if certain requirements are met.

You can require this by sending us an email at info@complianceassociates.ca

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the location of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the applicable data protection laws and regulations.

3. Logfiles

We collect data through our internet access logs. When you access our website, your internet ip address is automatically collected and is placed in our internet access logs (i.e., log files on server). We also record the URLs of the pages you visit within www.complianceassociates.ca, the times and dates of such visits, information about the computer hardware and software you use.

This information may include Internet protocol (IP) addresses, browser type and version, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data, number of visits, websites from which you accessed our site (Referrer), and pages that are accessed by your system via our site.

The processing of this data is necessary for the provision and the security of our website. We do not link this data to certain individuals. After the processing for the mentioned purposes, the data will be deleted.

4. Contact

On our website we use several contact forms which can be used to get in contact with us electronically. To handle your request it is necessary to provide us with a valid email address, and, in addition, we store your IP address and the time of your request to prevent any misuse of our contact forms. Alternatively, you may contact us via the e-mail addresses cited above. If you use one of these channels, the personal data transmitted will be stored automatically by Compliance Associates as data controller to handle our contact with you.

In some cases we may ask you for further information, such as name, occupation, address or telephone number.

5. Registration on our website

If you make use of our website to register for certain services or events, or to download eBooks, or to submit messages on one of our contact forms, you will be asked to provide data. The information inserted in the respective registration form will be transmitted to Compliance Associates as data controller. This is necessary to provide you with the respective service.

6. Application for Jobs

Our website offers the opportunity to apply for employment. If you make use of these possibilities by providing your personal data, including contact details, experiences, roles, etc. or provide (solicited or unsolicited) special categories of personal data, the information inserted in the application form or otherwise provided (e.g., by you including it in a resume) will be transmitted to Compliance Associates as data controller.

At your registration on the job application portal, your IP-address and date and time of your registration will be collected. This allows us to prevent misuse of our services.

7. Unsolicited special categories of personal data

Other than the information you provide when you apply for a job at Compliance Associates we do not generally seek to collect special categories of personal data through this site.

"Special categories of personal data" includes the various categories of personal information and data identified by privacy law as requiring special treatment, including in some circumstances the need to obtain explicit consent. These categories may include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning sexual orientation.

Therefore, we advise you not to provide any unsolicited sensitive personal data. Compliance Associates applies HTTPS or other appropriate technical and organizational measures to secure the personal data transmitted over its website

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8. Newsletter

We may provide the opportunity to sign-up for a periodic email newsletter by entering in your email address. In some cases we may ask you for further information, such as name, occupation, address or telephone number.

If you subscribe for our periodic email newsletter your IP address as well as data and time of subscription will be collected and stored at Compliance Associates as data controller. This allows us to prevent misuse of our services or of the e-mail address of the subscriber. This data is only used for the distribution of the newsletter. The subscription may be terminated by you at any time by following the unsubscribe instructions included in each newsletter.

9. Blogs

Our website offers publicly accessible blogs. You should be aware that any information you provide in these areas may be read, collected and used by others who read them. Our main blog channel is managed internally.

10. Testimonials

We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your permission we may post your testimonial along with your name.

11. Cookies (General Information)

Compliance Associates' websites make use of cookies to save and retrieve information about your visit to our sites. Cookies are small files of software which save and retrieve information about your visit to a website or application. They reside in your internet browser to help remember your preferences and previous activity. You can find more information about cookies at www.allaboutcookies.org

We and our partners (e.g., marketing partners, affiliates, or analytics providers use cookies and log files to analyze trends, administer the website, track users movements around the website, and gather demographic information about our user base. We may receive anonymized reports based on the use of these technologies by our partners on an aggregated basis. We also use this data to provide the site's content, ensure the functionality of our information technology systems, and to optimize our website. The data of log files will be stored separately from your other personal data.

Users can control and refuse the use of cookies at the individual browser level. Cookies installed can be deleted. If you have visited our website in the past and would like to make changes to your cookie preferences, please first clear the cookies from your browser and then update your cookie preferences. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

When you visit our website, the following categories of cookies will be set in your browser:

11.1 Strictly necessary cookies

These cookies are essential in order to enable you to move around a site and use its features. Without these cookies services you have asked for cannot be provided.

11.2 Registered Visitor Cookie

A unique identifier given to each registered user, used to recognize you anonymously through your visit and when you return to the site.

11.3 Performance cookies

These cookies collect information so that we can analyze how our visitors use our site. All information these cookies collect is anonymized and is only used to improve how our site works.

11.4 Functional cookies

These cookies allow websites and applications to remember choices you make (e.g., such as your user name or the region you are in) and provide enhanced, more personal features.

We may use information collected from functional cookies to identify user behaviour and to serve content based on the user profile. These cookies cannot track your browsing activity on other websites. They do not gather any information about you that could be used for advertising or to record where you've been on the Internet outside our site.

11.5 Targeting cookies

In order to keep our website services relevant, easy to use and up-to-date, and understand interest in our services we use web analytics services to help us understand how people use the site.

Cookies allow web analytics services to recognise your browser, device, or IP address and, for example, identify whether you have visited our website before, what you have previously viewed or clicked on, and how you found us. The information is only used for statistical purposes, and it helps us to analyse patterns of user activity, user interests, and to develop a better user experience.

12. Third Party Applications

We will respect and protect your privacy as set out in this Privacy Policy. We will share your personal data with third parties only in the ways that are described in this Privacy Policy - and do not and will not sell your personal data.

Compliance Associates shares your personal data with third parties, in particular non-CA parties, only with your express consent or under another lawful basis for processing under the applicable law.

Categories of non-CA parties with which we share your personal data include vendors such as host and cloud service providers, marketing and mailing agencies, and sub-contractors involved in the fulfilment of our contractual obligations towards our clients.

12.1 Google Analytics

Our website uses Google Analytics, a web analysis service of Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, www.google.com ("Google Analytics" or "Google"). Google Analytics employs cookies that are stored to your computer in order to facilitate an analysis of your use of the site. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there.

In using Google Analytics our website employs the extension "anonymizeIp". In doing so, Google abbreviates and thereby anonymizes your IP address before transferring it from EU/EEA member states. Google uses this information to analyze your use of our site, to compile reports for us on internet activity and to provide other services relating to our website.

Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly as noted elsewhere in this Privacy Policy. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

Google Analytics also offers a deactivation add-on for most current browsers that provides you with more

control over what data Google can collect on websites you access. The add-on tells the JavaScript (ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from being transmitted to us or to other web analysis services we may engage.

Google Analytics also uses electronic images known as web beacons (sometimes called single pixel gifs and are used along with cookies to compile aggregated statistics to analyze how our site is used.

You can find additional information on how to install the browser add-on referenced above at the following link: https://tools.google.com/dlpage/gaoptout?hl=en

12.2 Google Tag Manager (GTM)

Google Tag Manager (GTM" is a tag management system to manage JavaScript and HTML tags used for tracking and analytics on websites. Tags are small code elements that, among other things, are used to measure traffic and visitor behaviour: to understand the effect of online advertising and social channels; to set up remarketing and orientation towards target groups; and to test and optimize websites. GTM makes it easier for us to integrate and manage our tags.

If you have performed deactivation, GTM takes this deactivation into account. For more information about GTM's privacy practices can be found at https://policies.google.com/privacy?hl=en and terms of use

at https://www.google.com/analytics/tag-manager/use-policy/

12.3 LinkedIn Insight Tags

We use the "LinkedIn Insight Tag" of LinkedIn Corporation, 1000 W Maude Ave, Sunnyvale, CA 94085, USA ("LinkedIn") on our website. It helps us with in-depth campaign reporting and insights about our website visitors. It can also be used to track conversions, retarget website visitors, and unlock additional insights about members interacting with our ads on LinkedIn.

The LinkedIn Insight Tag enables the collection of data regarding members' visits to our website, including the URL, referrer, IP address, device and browser characteristics (User Agent), and timestamp. This data is encrypted, the IP addresses are truncated, and members' direct identifiers are removed within seven days in order to make the data pseudonymous. This remaining, pseudonymized data is then deleted within 90 days.

LinkedIn does not share personal data with us, it only provides aggregated reports about the website audience and ad performance. LinkedIn also provides retargeting for website visitors, enabling us to show personalized ads off our website by using this data, but without identifying the member. LinkedIn members can control the use of their personal data for advertising purposes through their account settings.

The above is in accordance with LinkedIn terms and cookie policies.

12.4 LinkedIn SlideShare

LinkedIn SlideShare is a Web 2.0-based slide hosting service of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085 USA, www.linkedin.com. Users can upload files privately or publicly in the following file formats: PowerPoint, PDF, or OpenDocument presentations. Slide decks can then be viewed on the site itself, on hand held devices or embedded on other sites. Our website uses the plugins offered by LinkedIn Slideshare to primarily share presentations and PDFs.

Regarding the use of LinkedIn Slideshare's plugins (and all plugins offered by LinkedIn products) see the LinkedIn Slideshare's Privacy Policy stating: "We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology (e.g., our off-site plugins), such as when you view or click on content (e.g., learning video) or ads (on or off our sites and apps), perform a search, install or update one of our

mobile apps, share articles or apply for jobs. We use log-ins, cookies, device information and internet protocol ("IP" addresses to identify you and log your use." More information about LinkedIn's privacy practices can be read at https://www.linkedin.com/legal/privacy-policy

14. Deletion and Term of Storage

Compliance Associates processes and stores your personal data only for the time necessary to achieve the stated purpose (unless otherwise stated in this Privacy Policy) and as permitted under the applicable laws or regulations.

As soon as the purpose for data storage is achieved, or the appropriate term of storage provided for by any applicable laws or regulations expires, your personal data will be deleted consistent with this and any other

applicable Compliance Associates policies (e.g., document retention and/or records management policy) unless your personal data are required for the formation of or performance under a contract.

15. Changes to the Policy

This Privacy Policy may be updated from time to time. In the event of any material and significant changes we will endeavor to provide a more prominent notice of the changes to this Privacy Policy.