

## **123 Technology Inc. - Privacy Policy**

It is 123 Technology Inc.'s ("OTT", "we", "us" or "our") policy to respect confidentiality and the privacy of individuals who have a business relationship with OTT. Under applicable law, OTT has an obligation to collect information from its clients and verify their identity to meet regulatory requirements. This Privacy Policy sets out the ways OTT collects, uses and discloses client information upon receipt of personal information submitted.

In accordance with applicable federal and provincial legislation in Canada, including the [\*Personal Information Protection and Electronic Documents Act\*](#) ("PIPEDA"), OTT has adopted privacy practices to protect personal information as part of its overall service commitment to its clients, and makes reasonable efforts to keep personal information secure and confidential. Each employee or representative of OTT is required to handle clients' personal information and perform duties in compliance with this Privacy Policy.

Personal information refers to information that can identify an individual, and may include, for example, your name, home address, telephone number, personal email address, date of birth, IP address etc. Such information may be provided to us when using the App, by a phone call, and/or correspondence in mail or via email to us, by use of our website (the "Application"). Personal information that is de-identified or aggregated and/or that cannot be associated with an identifiable individual is not considered to be personal information.

### **Application and Scope**

This Privacy Policy generally applies to any personal information (as described above) collected or generated by OTT from you via the APPLICATION or otherwise and explains how we use and disclose personal information that we collect in accordance with PIPEDA.

### **Principles of PIPEDA**

#### **Principle 1 – Accountability**

Each employee of an organization is responsible for personal information under his or her control and designated individual(s) shall be accountable for compliance with its Privacy Policy.

#### **Principle 2 – Identifying Purposes**

The purposes for which personal information is collected shall be identified before or at the time the information is collected.

#### **Principle 3 – Consent**

The prior knowledge and permission of the individual are required for the collection, use and/or disclosure of personal information, except for legal or security reasons.

#### **Principle 4 – Limiting Collection**

The collection of personal information shall be limited to that which is necessary for the purposes identified. Personal information shall be collected by fair and lawful means in accordance with this Principle.

## **Principle 5 – Limiting Use, Disclosure and Retention**

Personal information will not be used, disclosed or retained for purposes other than those stated at the time of collection, except with the permission or consent of the individual, or as permitted and/or required by law.

## **Principle 6 – Accuracy**

Personal information shall be as accurate, complete and current as is necessary for the identified purposes for which it is to be used.

## **Principle 7 – Safeguarding Information**

Personal information will be protected by safeguards appropriate to the sensitivity of the information.

## **Principle 8 – Openness**

The policies and procedures of an organization relating to the management of personal information will be made readily available to its clients and employees for specific information.

## **Principle 9 – Individual Access**

Upon request, an individual will be informed of the existence, use and disclosure of his or her personal information and shall be given access to it. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## **Principle 10 – Handling Client Complaints and Suggestions**

Individuals can address any complaint regarding compliance with the above principles to the Privacy Officer of OTT.

## **Privacy Practices of OTT**

OTT recognizes an individual's right to privacy. OTT adheres to the above ten principles of PIPEDA and only uses personal information for legitimate business purposes. The above principles pertain to all employees or representatives of OTT. Each employee or representative of OTT is responsible for client personal information under his or her control and designated officers are accountable for compliance with this Privacy Policy.

## **Why Your Personal Information Is Required**

OTT is required by law to obtain and collect certain personal information about you as a client in order for us to set up and maintain an account for you or provide services to you. As stated below, such information will allow OTT to carry out its obligations under law and policies regarding client identification and verification, and help establish a relationship with you to provide the best possible service to meet your needs.

- \* To understand and establish your identity as a client;
- \* To create a client record or file as required by OTT;
- \* To understand your needs and assess your eligibility for our services and products;

- \* To provide you with the services you have agreed to obtain from OTT;
- \* To maintain business relations and protect you and us from error or any fraud; and
- \* To comply with all applicable laws, regulations and compliance requirements.

### **Purposes of Using Your Personal Information**

After your personal information is entered into the APPLICATION or provided to OTT's employees, we may use it for the following purposes:

- \* To identify you as a client and create a client record or client information file for you;
- \* To establish and administer your account, and execute your transactions or services requested;
- \* To maintain, store, record and determine your account, transactions or services related records;
- \* To ensure our records about you are accurate, and verify information obtained when necessary;
- \* To provide you with your account, transaction history or services related confirmations, receipts or other information that may be requested or necessary to meet your needs;
- \* To provide you with quality client service and support with respect to your account, transactions or services;
- \* To maintain our business relationship with you and protect the interests of you and OTT;
- \* To meet all applicable legal, regulatory and compliance requirements of OTT, such as those under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act (Canada)*; and
- \* For any other purpose to which you consent or that is permitted by privacy law and/or any other applicable law.

When communicating with you for the purposes above, you consent to receive your account, transactions or service related communications from us in any form, including mail, email, phone call, internet or through the APPLICATION.

### **Obtaining Your Consent**

Your consent is obtained before and/or at the time you register for a relationship with OTT, by launching the APPLICATION or using the APPLICATION, and by accepting the terms of this Privacy Policy. At such times, you will be required to provide certain personal information in order for us to establish the account or provide you services. The information may be collected via the APPLICATION in which case you will formally indicate your consent for OTT to collect and use your personal information when you "agree" to the agreement. Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice.

You may withdraw your consent to receive communications, have your information collected, used, and disclosed at any time or shared with our affiliates and partners. Please note that this may affect our ability to continue providing you with the products and/or services that you have or would like to receive. If you wish to withdraw your consent to the collection, use or disclosure of your personal information; or you do not wish to receive

information about our current and future product offerings, special promotions, marketing communications and/or other services, please contact us via the “Contact Us” section on the App

In general, by using OTT products and services and/or submitting information to us in connection with using OTT products and services, you are providing your consent to the collection, use and disclosure of personal information as set out in this Privacy Policy. Moreover, by visiting, interacting with and/or using the APPLICATION, you agree to benefit from, and be bound by, the terms and conditions of this Privacy Policy.

### **How Personal Information Is Collected, Recorded and Stored**

OTT collects personal information from you as a client in a number of ways as stated below. These ways apply to all methods of collecting personal information including hard copy, electronic and verbal means, and the personal information provided by you will only be used for the purposes indicated in the section titled “Purposes of Using Your Personal Information” above.

- \* Directly from you, when you register for and use the APPLICATION Account. .
- \* Your voluntary disclosure of personal information directly to OTT via the “Contact Us” section of the App. , and such client account or service related information will be recorded and retained properly.
- \* By contacting OTT staff or through those you authorized in writing to conduct business on your behalf.

OTT protects your personal information by using appropriate storage, which may be kept in electronic or paper format, and is gathered in a client record. Such client record may include information about you such as your name, date of birth, address, phone number, identification, occupation etc. Depending on the type of business or service required, OTT may need to keep additional information about your business relationship, transactions or when identified as a necessity during the business process, or as required by applicable law or compliance policy.

While providing services to you, OTT employees and representatives are required to obtain accurate, complete and current personal information from you, and keep such information updated as necessary for the identified purposes related to your account, transactions, or services. Such information is required to be provided and updated in a timely manner in order for us to provide you with better service and meet our regulatory requirements.

### **Limiting Use, Disclosure and Retention of Personal Information**

Any personal information collected from you will only be used for the purposes identified at the time of collection and will only be retained for as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required by law. If certain information requested is not provided, OTT may not be able to assess your application or needs.

In the course of business activities, all employees of OTT and authorized representatives or service providers are required to protect the confidentiality of client personal information for limited use and stated purposes only. Access to your personal information is restricted to those authorized employees and representatives or service providers who need it to do their jobs. Under no circumstances will client personal information be provided or sold to other companies for their own use, other than entities affiliated with OTT.

Under certain circumstances, we may disclose your personal information to third parties, including the purposes outlined below. This is done only to meet your service requirements or as may be required by any relevant law or

government agencies OTT will strive to protect personal information disclosed to third parties by contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections.

\***Administration:** We may share your personal information with our affiliates who perform administrative services on our behalf.

\***Legal and Regulatory:** We may disclose your personal information as necessary to meet legal, regulatory, audit and security requirements.

\***Business Transactions:** We may disclose your business transactions to third parties connected with the redemption of the products distributed by OTT through the App.

\***Marketing:** Unless you have opted out, OTT may share your personal information with its affiliates and partners to enable them to offer you additional products and services.

Unless you have opted out, in addition to the above uses and disclosures, we may consult your personal information from time to time in order to determine your suitability for, and occasionally offer you, additional products and services. We may also disclose the above types of information to our affiliates and partners for their use for similar purposes and to send you information about their products or services.

### **Protecting and Safeguarding Your Personal Information**

OTT is committed to protecting your personal information in a manner consistent with our privacy practices. In order to ensure your personal information is protected, OTT keeps your information securely in its offices, requires all its employees to adhere to related policies and procedures when handling client information and takes appropriate security measures to safeguard your personal information. OTT has implemented privacy procedures to safeguard the personal information of its clients, which may be in both physical and electronic format. We restrict access to personal information to only those employees on a need-to-know basis to provide you with our products or services. We maintain physical, electronic and procedural controls to safeguard personal information.

We protect your account information by keeping it on secure servers, using firewalls and other security technology to protect our network and systems from external attacks, and by requiring clients to enter a unique user ID and password to access our systems.

We use software programs to monitor network traffic and identify unauthorized attempts to change information or damage our systems. This records the IP address of the computer that has contacted our website/App, the date and time of the visit and the pages visited (where applicable). These security measures include the following:

- \* Physical access security, restricted access to our offices;
- \* Login and passwords set up on our systems;
- \* Limiting access to client information to those employees and representatives who need to know for their work;
- \* Secure file encryption put in place to avoid unauthorized access, modification, or use of personal information;
- \* Requiring authorized third party service providers or business partners to take appropriate measures to secure our client information or remedy it if a breach occurs; and

\* Disposing of or destroying personal information as required by following procedures to use proper means or safeguards to prevent unauthorized persons from gaining access to the information during the disposal/destruction process.

### **Right to Access Your Personal Information**

You have the right to access, correct and ask questions about your personal information after it has been provided to OTT. This right may include the following:

- \* Whether we hold any personal information about you;
- \* How we collect, use or disclose your personal information;
- \* Whether and how you can see or access that information;
- \* Accuracy or completeness of your personal information;
- \* Other questions or issues you may have about your personal information.

You may contact us by phone, mail or by using the information in the “Contact Us” section on the APPLICATION. When requesting access to your information, typically full access to your information is provided. However, there may be some legal or administrative limitations in certain cases.

You may also request specific information about our policies and procedures relating to the management of your personal information by reviewing this Privacy Policy or by contacting us . We may take reasonable steps to verify your identity before granting access or making corrections.

### **Changes and Updates to this Privacy Policy**

Our Privacy Policy may change from time to time to reflect changes and updates in our policies, applicable law, regulations, new technologies, standards, customer concerns or related compliance requirements. It is important for you to review this Privacy Policy by visiting our website/App regularly, as such changes may be made without prior notice.

### **Use of Cookies, Digital Markers and Analytics**

"Cookies" are small bits of information that are placed on the hard drive of your computer. Cookies remember information about your activities on the site to make your visits to our website/App more enjoyable and valuable to you by providing a customized experience and recognizing your preferences when you visit our website. If you've chosen to disable cookies on your browser, some of the functionality of our website/App may be lost. Some web pages/Apps, particularly those that require a login and password, require that cookies be enabled in your browser and cannot be used when you have disabled cookies in your web browser.

Flash cookies (also called Local Shared Objects or “LSOs”) are data files similar to cookies, except that they can store more complex data. Flash cookies are used to remember settings, preferences, and usage, particularly for video and other similar services.

Web beacons are small graphic images on a webpage/App or in an e-mail that can be used for such things as recording the pages and advertisements clicked on by users, or tracking the performance of e-mail marketing campaigns.

Web server logs are records of activity created by the computer that delivers the webpages you request to your browser. For example, a web server log may record the search term you entered or the link you clicked to bring you the webpage. The web server log also may record information about your browser, such as your IP address and the cookies set on your browser by the server.

Geo-location technology refers to technologies that permit us to determine your location. We may ask you to manually provide location information on our website/App, or to enable your mobile device to send us precise location information. We may also automatically collect general location information from your web browser.

### **Links to Non-OTT Websites**

Links to third-party websites on the APPLICATION are for client convenience and ease of access to information. Once you access those links you will leave the OTT website and be re-routed to the third-party website. We do not control third-party sites or their privacy practices, which may differ from our own policies. We make no endorsement, representation or warranty about third-party websites. The personal data that you choose to provide to third parties is not covered by this Privacy Policy.

You should review the privacy policy of any third-party website before submitting your personal data. Some third-party entities may choose to share your data in which case your personal data will be governed by the privacy practices of the disclosing third-party entity.

### **Resolving Your Questions and Concerns**

OTT employees and representatives are required to record and maintain the accuracy of your personal information on file and ensure that it is complete and up-to-date. However, from time to time, there may be an error or a change. If you discover any inaccurate information on your account or transactions, or if your personal information has changed, please notify us immediately so we can correct and/or update it in a timely manner.

In addition, if you have any questions, concerns or a complaint regarding this Privacy Policy or the personal information that we have about you, please contact us directly using the information below. Upon receipt of your request or complaint, we will contact you as soon as possible to ensure that the necessary corrections or changes are made in a timely manner, and will act diligently to address your concerns or resolve the problem appropriately.

This Privacy Policy was last updated on February 25, 2020.

### **Contact Information:**

**Attention: Privacy Officer**  
**123 Technology Inc.**  
1123 Leslie Street  
Toronto, Ontario, M3C 2K5