

Sincron Privacy Policy (Public)

Last Updated: **December 20, 2017**

Sincron HR Technologies Inc. (“Sincron HR,” “we,” “us,” or “our”) recognizes the importance of privacy to our customers. This Privacy Policy (“**Policy**”) sets out the basis on which we manage any personal information Sincron HR technologies Inc. collects from you, such as through our website, <https://sincron.net> (the “Website”), or through other sales and marketing channels.

References within this policy to PIPA “Personal Information Protection Act” and PIPEDA “Personal Information Protection and Electronic Documents Act are included for information purposes only. Original source documents should be verified for these documents.

Sincron HR makes every attempt to ensure personal information is stored on servers that are located within the same country or territory that the data is collected from, as required by law.

Personal information we collect

As a provider of B2B software and services, Sincron HR may collect and process the following personal information about you:

- **Request a Demo:** When you request a free product demonstration, we may collect your name, job title, email address, phone number, and certain information about your company. We use this information to contact you and otherwise facilitate your demonstration.
- **Sign-up for Promotional materials:** When you sign-up to receive mail, e-mail, download articles or research materials, promotional incentives, or other types of business content regarding our products and services, we will collect information such as your name, mailing address or email. Newsletters will contain a method to unsubscribe.
- **Make a Purchase:** If you choose to purchase Sincron HR software and services, we will collect contractual information necessary to enter into an written agreement. We subsequently collect your payment information, such as your name, address, phone number, email address, billing address, and payment card information. This information is used to process and fulfill your order.
- **Submit a Job Application:** If you apply for a job with Sincron HR, you may provide us with certain personal information about yourself, such as that contained in a resume, cover letter, or similar employment-related materials. We use this information to process and respond to your application for current and future career opportunities. Unsolicited resumes are kept for a maximum of three months and is only used to satisfy the conditions of PIPEDA. Resumes no longer required for a legal requirement after this period will be destroyed.
- **Participate in Surveys or Contests:** We may also ask you for information, such as your name and email address, when you enter a contest or promotion sponsored by Sincron HR or

participate in one of our surveys or other forms of customer research. The information we collect from these contests, promotions and surveys may be used by us to facilitate your participation in the contest, promotion, survey or customer research and to improve our overall customer experience by helping us understand our customers. Information is not disclosed or sold to third parties without your permission.

- **Contact Us:** When you contact us with a comment, question or complaint, you may be asked for information that identifies you, such as your name, address and a telephone number, along with additional information we need to help us promptly answer your question or respond to your comment. We may retain this information to assist you in the future and to improve our customer service, service offerings, and our Website.
- You are not required to share this information with us, but without it you may not be able to access certain content or features or participate in certain areas of the Site. Information that is used to contact you will always provide you with an opportunity to request the removal of your contact information from future communications.

Information about our Website

Visiting our Website: If you use our Website, Sincron HR may collect information about your computer including, but not limited to your internet protocol address, Internet Service Provider, browser type, page requests, operating system, average time spent on our Website, referring website addresses. We use this information to help us understand our Website activity, and to monitor and improve our Website. This is statistical data about our users browsing action and patterns and does not contain personally identifiable information. To the extent that this information can be considered to be personal information, it is used solely for the purposes of administering our website and is not disclosed for any other purpose except as described in this website. If you visit our Website from a mobile device, Sincron HR to the extent permissible by law, may collect information such as your device type, device identifiers (such as cell-ID), mobile service provider, and your actual and/or approximate location (such as latitude, longitude, signal strength) through GPS or cell tower information.

Cookies: Our Website uses a technology called "cookies". A cookie is a tiny element of data that our Website sends to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user when they return. We use cookies to remember your preferences and to authenticate you. We will obtain information about your general internet usage, including but not limited to access times, clicks and information on cookie files and web beacons to improve the personalized service of our Website. You may refuse to accept these cookies, however if you select this setting, it may affect your usage of the Website.

Advertising: We may use third parties to create, host, or service our advertisements on other websites. These advertising companies may use cookies to collect information (such as web pages you visit and your response to ads) when you visit our Website and use that information to serve advertisements tailored to your interests on our Website or other third-party websites. Sincron HR will make every attempt to ensure third parties follow similar policies, however data

collected by third parties may be at risk of re-disclosure. To learn more about this behavioural advertising practice or to opt-out of this type of advertising, you can visit <http://youradchoices.ca/choices/>.

Third Party Links: Like most other websites, third parties such as advertisers may directly gather anonymous information from users of the Website through automated means such as cookies, web beacons and other technologies. This Policy does not cover how third parties use cookies or other technologies or any information they gather through such technologies.

The Website and Services may contain links to websites or other properties and content operated by third parties over which Sincron HR has no control. Their privacy policies may be different from our Policy, and you access such linked websites or third-party content at your own risk.

Usage of the Collected Information

We use information that we collect to help us provide you with better service. Among other things, the information we collect enables us to:

- Improve our services
- Ensure that contents in the Website are presented in the most effective manner for you and your device
- Communicate with you
- Conduct research and analysis
- Customize the content and advertising you see
- Provide you with additional information we think is of interest to you
- Fulfill your requests for products, services and information and validate your user rights
- Provide anonymous reporting for internal and external clients

We also may engage third parties to help us track and analyze anonymous information from users who visit the Website or use the Services or the performance of advertisements.

Disclosure of Personal Information

Sincron HR will not disclose, trade, rent, sell or otherwise transfer personal information, without consent, except as otherwise set out herein. Sincron HR will only disclose information as required or permissible under federal laws (i.e.: PIPA or PIPEDA in Canada), or with your explicit permission. We may transfer or disclose personal information as follows:

- **Service Provider Arrangements:** In connection with our Website or the services we provide to our customers, we may transfer (or otherwise make available) personal information to third parties who provide services on our behalf. For example, we may use service providers to process payments, host our Website and store information on our behalf. Our service providers are given the information they need to perform their designated functions, and

we do not authorize them to use or disclose personal information for their own marketing or other purposes.

Personal information may be maintained and processed by third party service providers in Canada, US, and internationally. Sincron HR information may be accessed by the courts, law enforcement and national security authorities as required under the laws of the jurisdiction of British Columbia, Canada. Third parties outside of British Columbia may have independent legal requirements for the provision of information in their legal jurisdictions in which Sincron HR is not responsible for. For more information about the way in which our service providers treat personal information, contact us as set out in the “Contact Us” section below.

- **Sale of Business:** Sincron HR may transfer personal information as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceeding) involving all or part of Sincron HR or as part of a corporate reorganization or other change in corporate control.
- **Legal:** Sincron HR and our Canadian, US and other affiliates may provide personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable Canadian, US or other law. Where a disclosure of our customers’ information is required by applicable law, we promptly notify our customer prior to complying with such requirements (to the extent we are not prohibited from doing so). In other legal proceedings, Sincron HR may also disclose personal information where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

Security and storage of personal information

Sincron HR takes all steps reasonably necessary to ensure that data collected through the website, email, or other means is treated securely in accordance with this Policy and applicable privacy legislation. Sincron HR stores information on servers located in the region, territory, or country in which services are provided. These servers may be directly or indirectly managed by Sincron HR or through third party service providers. Data collected by Sincron HR is managed using standard security procedures and practices appropriate to the nature of the information. Please be aware that no data transmission over the Internet can be guaranteed to be 100% secure. As a result, we cannot guarantee or warrant the security of any information you transmit on or through the Website or Services and you do so at your own risk.

Foreign countries

Your personal information may be transferred to and maintained on servers or databases located outside your province, state or country or to a jurisdiction where the privacy laws may not be as protective as those in your location. Please be advised that in order to provide you

with optimal services Sincron HR may process and store certain information in Canada and/or the US and/or the EU. Your use of the Sincron Website or Services constitutes your consent to and understanding of this processing and storage.

Access to Personal Information

If you submit personal information via our Website or otherwise provide us with your personal information, you may request access, updating or correction of your personal information by submitting a written request to our Privacy Officer (see “Contact Us” below). We may request certain personal information for the purposes of verifying your identity.

Changes to this Privacy Policy

This Privacy Policy may be updated periodically to reflect changes to our personal information practices. The revised Privacy Policy will be posted on the Website. We strongly encourage you to please refer to this Privacy Policy often for the latest information about our personal information practices.

Contact Us

Please contact us at info@sincron.net if:

- you have any questions or comments about this Privacy Policy;
- you wish to access, update, and/or correct inaccuracies in your personal information; or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your personal information