

## PRIVACY POLICY

Last update:      March 2020 [Note: update if necessary]

Thank you for visiting the website of Videns Analytics Group Inc. ("**Videns**"). This Privacy Policy applies to the website accessible at the link [www.vidensanalytics.com](http://www.vidensanalytics.com) (the "**Website**").

### 1. WHO WE ARE

For the purpose of this privacy policy (the "**Privacy Policy**"), any reference to Videns is deemed to include its related companies (including any subsidiaries), its divisions and other entities of its corporate group, their suppliers or licensors, as well as their respective employees, officers, administrators, shareholders, agents, subcontractors and other representatives.

This Privacy Policy is issued on behalf of Videns: when we use the expressions "we", "us", or "our" below, we are referring to the relevant entity of Videns responsible for processing your data. Additional privacy laws and practices apply to individuals whose personal data is collected and used in the European Economic Area ("**EEA**").

This Privacy Policy describes in which way we may collect, use, communicate, disclose and otherwise manage the personal data shared through the use of the Website or otherwise collected in the context of Videns activities. Our Privacy Policy also describes the steps we take to ensure data security, as well as how you can access, modify or delete the personal data we hold about you. In addition to this Privacy Policy, your visit of the Website is also subject to (i) our Terms & Conditions, available at [Note: insert link], and (ii) any other terms or conditions that may be communicated to you from time to time by Videns.

If you do not consent to Videns' practices regarding the collection, use, communication, disclosure and management of personal data as set out in this Privacy Policy, please do not provide us with your personal data and do not use the Website.

### 2. WHEN AND HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you, including through:

#### 2.1 Direct Interactions

- Contact with us through a form available on the Website;
- Contact with us about the services and products we offer;
- Contact with us for the purpose of asking a question, submitting a comment or making a complaint (customer service);
- Subscription to our newsletter, email communications and messaging services to receive news and updates;
- Job application; and
- Interaction with us on social media.

#### 2.2 Automated technologies or interactions

As you interact with our Website, we automatically collect certain Technical Data (as further defined in Section 3 below) about your equipment, browsing actions and patterns. Our Website uses a technology called "cookies". A cookie is a tiny element of data that our Website can send

to your browser, which may then be stored on your hard drive so that we can recognize you when you return to the Website. We use cookies to understand which areas of our Website are useful and which areas need improvement, which assists us in planning for future improvements to the Website. You may set your browser to notify you when you receive a cookie or not to allow certain cookies. However, if you decide not to allow cookies from our Website, you may not be able to take full advantage of all the features of the Website.

Our Website may also use a technology called "tracer tags" or "web beacons". This technology allows us to understand which pages you visit on the Website. We use these tracer tags to optimize and tailor our Website for you and other potential visitors.

We may also receive Technical Data about you if you visit other websites employing our cookies.

## **2.3 Third Party Sources**

We may obtain information about you from other sources, including from customers, service providers and business partners, and combine such information with other data that we hold about you.

Accordingly, we may call on third parties, such as Google, to:

- Perform remarketing, which consists of advertising on other websites to users who have visited our Website, including through Google Analytics (internet audience analytics solution). In such cases, relevant third parties, including Google, may advertise our content on sites across the Internet;
- Use the following features of Google Analytics: the creation of reports based on the saved impressions of our advertisements (a service that lets you place ads on a variety of news sites, blogs and other niche sites) to attract more potential visitors; integration with any management tool comprising a set of functionalities used for advertising, as well as targeting and monitoring advertising campaigns on websites and mobile devices, and creating related reports, including reports on the demographic data of internet users and their interests;
- Collect, analyze and/or gather your personal data (such as internet user's IP address, gender, age and interests), as well as create reports on the demographic data of internet users and their interests, in order to help us understand how visitors interact with our Website and how to improve our Website, our products and our services.

The companies conducting remarketing can combine the use of first-party cookies (such as Google Analytics cookies) and third-party cookies (for example, DoubleClick cookies) to (i) gather personal data; (ii) inform, optimize and advertise based on your previous visits on our Website; and (iii) to determine the relationship between the registered visits on our Website and the advertising impressions, the other uses of advertising services and the interactions with these advertising impressions and services. To measure the effectiveness of our ads, these companies may also use tracer tags or web beacons to account for certain information regarding your visits to our Website and on the websites that contain links to our Websites or advertise it.

## **3. WHAT PERSONAL DATA WE COLLECT**

For the purposes of this Privacy Policy, the term "**personal data**" means any information about an individual from which that person can be identified. It does not include data from which identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Data** includes name, surname, email address, title, telephone number, postal address and contact preferences;
- **All information that may appear in a resume** or other documents submitted in connection with a job application;
- **Social Media Data** includes information associated with your social media accounts and related profiles, such as name, username, email address, profile picture, date of birth and gender;
- **Technical Data** includes IP (Internet Protocol) address, your login data, clickstream and other related information, such as the websites you visited immediately before and immediately after visiting our Website, your time zone and location settings, information about your Internet service provider and other technologies on the devices you use to access our Website;
- **Usage data** includes the number of visits to our Website, and the date and average time spent on our Website, in addition to information about how you otherwise use our products and services;
- **Marketing and Communication Data** includes your preferences in receiving marketing from us and third parties with whom we have a connection and your communication preferences.

For example, you may be asked for certain information when you visit the Website or when you decide to contact us through one of the various means offered on our Website, such as your name, postal address, email address, telephone number, country of residence and resume.

We also collect, use, store and share **Aggregated Data**, such as statistical or demographic data. Aggregated Data could be derived from your personal data, but is not considered personal data if it does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data and use it in accordance with this Privacy Policy.

**We do not collect any personal data that includes details about racial or ethnic origin, political opinions, religious or philosophical beliefs or union membership, nor any genetic or biometric data for the purpose of uniquely identifying a natural person, nor any data concerning the health, sexual life or sexual orientation of a natural person.**

#### **If you fail to provide personal data**

When we need to collect personal data by law, or pursuant to the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform such contract. In this case, we may have to cancel the delivery of a product or the performance of a service that you have requested from us, to the extent that your refusal makes it impossible to perform our obligations. If so, we will notify you in due time.

## 4. HOW WE USE THE PERSONAL DATA WE COLLECT ABOUT YOU

### 4.1 General principles

We limit the collection of personal data to what is reasonably required to fulfill the purposes for which it is collected. Most commonly, we will use your personal data in the circumstances described below.

- **With your consent:** for example, we will obtain your consent before sending marketing communications to you;
- **When we need to perform the contract that we are about to enter into or have entered into with you:** performance of contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps on your behalf or at your request before entering into such a contract;
- **When it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests:** a legitimate interest means the interest of Videns in operating and managing our business to enable us to give you the best products and services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can get further information on how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our Privacy Officer.
- **When we have to comply with a legal obligation:** comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### 4.2 Purposes for which personal data is collected and used

The personal data that we collect may be compiled or used by all of the entities and persons comprising Videns, as listed above. It may also be communicated internally to allow us to adequately respond to your requests, communicate with you or assist you for the purposes described in this Privacy Policy.

We have set out below, in a table format, a description of all of the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact our Privacy Officer if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
Contact with us	We provide forms on our Website to	<ul style="list-style-type: none"><li>• Consent;</li></ul>

through a form available on the Website.	help structure the information you send us, including forms that allow you to download documents from our Website.	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to operate our business and process forms for their intended purposes).</li> </ul>
Contact with us about the services and products we offer.	We use these personal data to treat your request and provide you with information regarding our products and services.	<ul style="list-style-type: none"> <li>• Consent;</li> <li>• Necessary for our legitimate interests (to operate our business and answer requests with regards to our products and services from existing or potential customers.)</li> </ul>
Contact with us for the purpose of asking a question, submitting a comment or making a complaint (customer service).	If you contact us with a comment, question or feedback through one of our electronic forms, through email or via telephone, we may collect some of your personal data, as well as your comments, suggestions or feedback. Your personal data will be used to respond to your comments, questions or feedback. We may also use your comments, suggestions or feedback to monitor and/or improve our products and services offerings and our Website.	<ul style="list-style-type: none"> <li>• Performance of a contract with you;</li> <li>• Necessary for our legitimate interests (to operate our business and answer requests with regards to our products and services from existing or potential customers).</li> </ul>
Subscription to our newsletter, email communications and messaging services to receive news and updates.	Occasionally, we may collect certain personal data (such as surname, first name, postal code, country, province, gender, telephone number and email address) in order to send you emails regarding our products, services or promotions, as well as those of third parties with whom we have a connection. You can remove your email address from the mailing list at any time by following the instructions in each of our emails. You can also remove your email address from our mailing list by contacting us as described in the section "Contact us" at the end of this Privacy Policy. Your request will be processed within the time periods prescribed by law, if applicable.	<ul style="list-style-type: none"> <li>• Consent;</li> <li>• Necessary for our legitimate interests (to study how existing and potential customers use our products and services, to improve our marketing strategies, to develop our products and services offerings, to operate and grow our business).</li> </ul>

Job application (for example, information included in a resume, a cover letter or other similar documents related to a job application).	In the context of a job application or any related request for information, we use your personal data to process and respond to your request regarding present and future career prospects.	<ul style="list-style-type: none"> <li>• Consent;</li> <li>• Necessary for our legitimate interests (to operate our business, process your job application or reply to your request for information).</li> </ul>
Interaction with us on social media.	We may offer you the opportunity to consult our content from or through third-party social media websites, plug-ins and applications. When you consult our content, you can also allow us to have access to certain data associated with your social media accounts (for example your name, username, email address, profile picture and gender) in order to advertise our content or for the purpose of operating our Website, plug-ins and applications. When you provide information about your social media accounts, we may use that information to personalize your visit of the Website and of third-party networking websites, plug-ins and applications. We may also use this information to provide you with certain products or services that you have requested.	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how existing and potential customers use our products and services, to improve our marketing strategies, to develop our products and services offerings, to operate and grow our business).</li> </ul>
Website information – Technical Data.	When you visit our Website, Videns will collect certain information about you. For all visitors of the Website, we collect the IP (Internet Protocol) address and clickstream, as well as other information, such as the websites visited immediately before and after the visit to our Website, page requests, browser type, operating system, Internet service provider, the number of visits to our Website, the date and the average time spent on our Website. We use this information to administer our Website, monitor and improve our products, services and Website, study how our Website is used, understand which portions of our Website are popular and analyze	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to operate our business, to provide administrative and technical services and to prevent fraud);</li> <li>• Necessary to comply with a legal obligation.</li> </ul>

	trends and use patterns.	
Customer relationship management (CRM) databases.	When you participate in any of the activities described above, we collect the personal data provided in the course of these activities to supplement and update our databases relating to customer relationship management. In this context, the personal data collected is used to generate mailing lists and reports for internal use about the relationship between Videns and its existing or potential customers, in order to monitor and/or improve our products and services offerings and our Website.	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how existing and potential customers use our products and services, to improve our marketing strategies, to develop our products and services offerings, to operate and grow our business).</li> </ul>

## 5. HOW WE DISCLOSE YOUR PERSONAL DATA

### 5.1 Principle

Unless expressly stated in this Privacy Policy, we do not sell, rent, transfer or disclose your personal data with third parties without your consent for purposes which are not disclosed herein. Access to your personal data is restricted to Videns, including staff members, management and the marketing team, who need to access your personal data as part of their duties for Videns.

### 5.2 Exceptions

We may share your personal data that is not encrypted and to which we have access to:

- **Service providers**, namely third parties (or otherwise make available to them) who provide services on our behalf in Canada, the United States or abroad, including Google, for the purpose of using the various Google Analytics features described herein. We provide our service providers with the information they need to fulfill their mandate, and we do not authorize them to use or disclose your personal data for their own commercial activities or for any other purposes;
- Entities, organizations and authorities for **judicial purposes**. More precisely, Videns and its third-party service providers may disclose your personal data in response to a search warrant or other legally valid inquiry or order, or where necessary to respond to an investigative body in the event of a breach of agreement or a violation of the law, or as otherwise required or permitted by law. We may also disclose personal data where necessary for the establishment, exercise or defense of legal claims, to prevent actual or suspected loss, to avoid personal injury or property damage; and/or
- Another entity, in the event that **we sell part or all of our business or if we sell or transfer assets or are otherwise involved in a business merger or transfer**. Where appropriate, we may transfer your personal data to a third party as part of that transaction.

Our Website may contain links to other websites that we do not own or operate. In addition, links to our Website may appear on third party websites on which we advertise. Except as provided in this Privacy Policy, we will not share your personal data with these third parties without your consent. Links to third party websites are provided to the users of our Website for convenience only. These links are not intended to be an endorsement or recommendation of the linked sites. The linked websites may have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use, disclose, protect or otherwise process your personal data.

## **6. HOW WE PROTECT YOUR PERSONAL DATA**

We have put in place and use administrative, technical and physical safeguards to protect the personal data we hold about you against unauthorized access, use, modification and disclosure.

We also take special measures to assess the potential risks applicable to the disclosure of your personal data. In the event of a security breach, namely if your personal data is lost, disclosed without your authorization or becomes accessible to an unauthorized person, we will inform you of such breach if it poses a real risk of significant harm. For example, a real risk of significant harm includes bodily harm, humiliation, loss of professional opportunities, financial loss or identity theft. If the breach poses a real risk of significant harm, we will notify you directly as soon as possible. If we cannot notify you directly, we will notify you of the breach by public communication. We will provide you with the information required to understand the significance of the security breach and take the necessary steps to reduce the risk of harm that may arise from it. We will also report the security breach to the government and any other organization that we believe may reduce the risk of harm that may result from this breach. We keep records of all security breaches. Following a security breach, Videns investigates the causes of the breach and reviews the safeguards in place to prevent future breaches.

## **7. HOW LONG WE RETAIN YOUR PERSONAL DATA**

We have procedures in place regarding the retention of personal data which are designed to retain personal data only as long as necessary to fulfill the purposes described in this Privacy Policy or to otherwise comply with the requirements of the law.

## **8. TRANSFERS OF PERSONAL DATA TO OTHER COUNTRIES**

Your personal data will be accessible from Canada. In some cases, your personal data may be compiled, disclosed, used or stored outside of Canada by any of the entities and persons comprising Videns, by a subsidiary or a third-party service provider, and these personal data may be subject to disclosure in accordance with applicable laws in these territories. We will take all steps reasonably necessary to ensure that any personal data transferred outside of Canada or the EEA is processed securely and in accordance with data protection laws applicable in the jurisdiction in which the data is processed or stored. These laws may not provide the same level of protection as Canadian or EEA privacy laws.

## **9. CHANGES TO PRIVACY POLICY**

This Privacy Policy is regularly reviewed and may be updated from time to time to reflect changes in applicable laws or our practices regarding personal data. If we decide to change our



Privacy Policy, we will post the revised policy on our Website. We will treat your personal data in accordance with the most recent version of the Privacy Policy.

## 10. TO COMMUNICATE WITH US

We have appointed a Privacy Officer who is responsible for overseeing questions in relation to this Privacy Policy. If you have questions or comments regarding how we treat your personal data, including any request to exercise your legal rights, or if you wish to request access to, update or correct the personal data we hold about you, please contact our Privacy Officer as indicated below:

Attention: Virginie Boivin

Phone: (581) 888-8451

Mailing address: 2828 boulevard Laurier, Suite 7, Québec (Québec), G1V 0B9

Email: [virginie.boivin@vidensanalytics.com](mailto:virginie.boivin@vidensanalytics.com)

By Internet: [www.vidensanalytics.com](http://www.vidensanalytics.com)

You can also withdraw your consent to the collection, use and disclosure of your personal data at any time using the contact details above. However, if you withdraw your consent, we may no longer be able to continue to respond to your demands, process any requests submitted to us, or otherwise assist you with respect to the Website.

## 11. YOUR LEGAL RIGHTS

In relation to your personal data, you have the rights detailed below:

- **Request access to your personal data** (commonly known as “data subject access request”): this enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Request the correction or update of the personal data we hold about you:** this enables you to have any incomplete, inaccurate or outdated data we hold about you corrected or updated. However, we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data:** this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data when you have successfully exercised your right to object to processing (see below), when we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to the processing of your personal data:** where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to process your data

which override your rights and freedoms, and, in such cases, we may decide to continue processing your personal data.

- **Request restriction of processing of your personal data:** this enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy;
  - When our use of the data is unlawful, but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer need it, as you need it to establish, exercise or defend legal claims; or
  - You have objected to the use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request to transfer your personal data to you or to a third party:** we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw your consent at any time when we are relying on your consent to process your personal data:** however, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services, and this may prevent us from responding to inquiries, providing technical support or otherwise assist you in connection with use of our products and services. We will notify you if this is the case when you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Privacy Officer.

You will not have to pay any fees to access your personal data (or to exercise any of the other rights set out above).

If you want to exercise any of the above-mentioned rights, we may need to ask you for specific information to help us confirm your identity and ensure your right to access your personal data (or to exercise your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you for further information in relation to your request to speed up our response.

We will respond to all legitimate requests within thirty (30) days.