

ACL Privacy Policy

ACL Services Ltd. and its affiliates (“ACL”) respects your privacy and is committed to protecting your personal information. This policy outlines how we handle the collection, use, disclosure and protection of your personal information. Our policy is guided by the provincial and federal privacy laws applicable in British Columbia, Canada. ACL is responsible for ensuring the protection of the personal information you have provided to us. The Legal Department is responsible for ensuring that ACL takes the steps outlined in this policy to comply with its privacy obligations.

This policy applies to the personal information we collect through your purchase, use of, or access to, ACL websites and ACL products, included SaaS products or software. The terms “Information”, “information”, “Personal Information” or “personal information” when used in this policy includes your name, job title, organization, address, contact information, billing information and other types of information described under the section “What Information Do We Collect?” below. It does not include any customer data that you may upload or input in any ACL product. “Customer data” means any data, information or other material (proprietary, copyrighted or otherwise) which is uploaded, entered, created or otherwise provided by you in the course of using ACL products, including, but not limited to, any third party data obtained by you.

I. What Information Do We Collect?

We collect (a) information you provide to us directly, (b) information we automatically collect when you access and use ACL products, and (c) information provided to us by third parties authorized to share such information.

A. Information you provide directly to us in the course of conducting business with ACL includes:

- **Account and profile information** – this is information we require to create an account for your organization and an account for your users. This information includes your name, job title, company or organization, address, telephone number, fax number, email address, username and any other contact information you choose to provide.
- **Financial/transactional information** – this includes your billing address, credit card details (number, expiration date, card verification value (cvv) if you choose this payment option or your other payment preferences that you choose to provide, and the types of purchases you have made (products and services).
- **Other preferences** you may choose to share with ACL, such as invoicing preferences, notice information, special notes you have asked us to include with your account information.
- **Support enquires** - Information you provide to ACL through Support enquiries.
- **Marketing, Surveys, Contests, Forums** - If you participate in our surveys or contests, use our forums, submit scripts to ScriptHub or content to Inspirations or other information through our forums, your survey opinion and submissions for our contests will be collected, together with your name, job title, company or organization, address, telephone number, fax number and email address.
- **Career information** - If you provide your resume to us through, for instance, the Careers section of our web site, we will also collect this information and retain your resume and contact details in our records.

B. Information ACL collects automatically when you access and use ACL products or ACL websites includes:

- **Usage Information** – ACL collects analytics information when you use ACL websites or ACL products for the purpose of generating usage information. Usage information is aggregated data about usage of the ACL products, applications and features used, number and size of attached

files, number and types of devices used to access or use ACL websites and ACL products, or content and ACL webpages viewed. Usage information does not contain any customer data.

- **Log Information** – ACL may collect your Internet Protocol (“IP”) address, browser type and settings, language preferences, access times, your Internet Service Provider, the address of the webpage you visited before ACL and cookies. Your IP address is a unique 32-bit numeric address that distinguishes your computer from another computer. Cookies are small text files that contain information about you to allow you to access and use the ACL websites or ACL products without re-entering your username and password. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. ACL uses a high encryption algorithm on its cookies so that only our server can read and decrypt the contents within it and other parties will not be able to access such information.
- **Device Information** – ACL products are accessible through mobile devices. If you access ACL products through your mobile device, ACL will collect information about the device, including the hardware model, operation system and version, unique device identifiers, mobile network information or platform information (to the extent permitted) and device settings.

C. Information provided by third parties may include:

- Information that a reseller may provide to ACL that you have provided to the reseller in order for ACL to fulfil your order or request.
- Information from third parties that may aggregate information ACL has collected or information about how well a marketing campaign or a contest has performed.
- Information you provide to a third party social media service that is publicly available.

II. Why Do We Collect Your Information?

A. We collect information from you for the following reasons:

- to provide, operate, maintain and improve ACL products and services to you (which may involve processing your order, invoicing and processing payment, registering you for products, training and services and providing new product versions and updates);
- to enable you to access and use the ACL products, including uploading, downloading, collaborating and communicating using the ACL products, including Support services;
- to provide information on our products and services that may be of interest to you, including new features, surveys, newsletters, offers, promotions, contests, and events;
- to verify your identity for the purpose of obtaining access to our products and services (for instance, the ACL GRC Service and the ACL Support Center are only available to registered and/or supported users);
- to send you technical notices, security alerts and updates, scheduled maintenance alerts, and support and administrative messages;
- to respond to your comments, questions, and requests through our forums, channels to provide feedback and the ACL Support Center;
- to contact you when necessary, regarding issues concerning your use of our products and services;
- to obtain information about your use of our products and services, potentially through a survey to better understand your needs, as input to future product development plans or for marketing and advertising purposes;

- to gather general aggregate information based on IP addresses to track information about ACL web site usage (such as, the number of visitors, frequently viewed pages, number of downloads, etc.) and to improve the web site and web-based services;
- to make it easier for you to use our web site or web-based services (for instance, if you are a supported user, we will collect cookies of your email address and password so that you will not need to re-enter your password to log on);
- to obtain information about your qualifications and skills if you submit your resume to us for the purpose of applying for a position with ACL;
- the information may be legally required; and
- for other purposes for which we will notify you.

III. Collection, Use, Disclosure and Retention

ACL will only collect information that is necessary and will use the information you provide only for the purposes identified in this policy. We will not use this information for any other purpose unless we have obtained your consent. We will retain the information that we have collected from you only so long as it is necessary to achieve our stated purposes or if it is legally required that we retain such information.

ACL will only disclose information about you to its affiliated companies, distributors, resellers and to authorized agents that assist us in performing our functions for the limited purposes listed above and in compliance with this Privacy Policy. We may share your information as follows:

- **Service Providers/Vendors and Consultants** – ACL uses third party service providers or vendors to provide certain services as part of the ACL products, such as ACL Academy, ACL Support Center and Inspirations. ACL may confidentially share your information with third party vendors we use to run our business and to provide your subscribed services, including hosting providers, systems for collecting and storing sales account information, credit card processors, marketing service providers or consultants, and other contractors or consultants that work on our behalf.
- **Aggregate or Anonymized Data** - ACL may create and share aggregated or anonymized information that does not identify you with third parties.
- **Third Party Applications** – ACL provides you with opportunities to use third party applications or services. If you choose to use any third party applications or services, we may share information about you including your username and any other information you choose to share. This Privacy Policy does not apply to your use of such third party applications or services and we are not responsible for how those third parties collect, use, disclose and protection your information.
- **Corporate Transactions** – ACL may share your personal information in connection with, or during negotiations of, any merger, amalgamation, sale of company assets, financing, purchase or acquisition, subject to a commercially reasonable confidentiality or non-disclosure agreement.
- **Compliance with Laws** – ACL may disclose your information to a third party if we are required to do so in order to comply with applicable laws, government request, a court order or other quasi-government request to assist with an investigation. We may also be required to disclose your information to enforce our legal rights, to enforce security requirements, or to respond to an emergency which we believe in good faith requires us to disclose your information. In such instances, if permissible, we will make every reasonable effort to give you as much notice as possible regarding the disclosure of your information, what information was disclosed and why.

IV. Ensuring Accuracy

ACL will make reasonable efforts to ensure that the information we collect from you is accurate and complete. If you notice any errors in the information that we have collected from you or wish to update

your information, please notify your ACL contact or email info@acl.com. You can advise us as to where you saw the incorrect information so that we can then correct or update such information. If you are a supported user, you may directly update your information online at our Support Center. If you are an ACL GRC user, you may directly update your account and profile information in the ACL GRC Service itself.

V. Security and Safeguards

ACL has taken reasonable steps to ensure the security of your personal information from loss, misuse and unauthorized disclosure. These steps include but are not limited to, policies, standards, procedures, training, background checks, physical access and logical access controls. While we follow and often exceed industry accepted standards to protect your information, no electronic communication is ever completely secure. For example, you share responsibility to protect authentication information to our services such as your username and password.

Employees and contractors are only granted access to the data they need to perform their job function and are required to follow the confidentiality and privacy requirements for your data in accordance with ACL's Information Security policies and standards.

ACL will notify affected parties of any incident involving sensitive information in accordance with ACL's Security Incident Response Plan and applicable legal and regulatory requirements.

VI. Preferences/Opt-Out

You may update, correct or delete information about you at any time by logging into your online account and modifying your information including your preferences to receive messages from us. You may also update, correct or delete information by contacting ACL Support through the ACL Support Center or your account manager. If you wish to deactivate your account please contact ACL Support or your account manager.

We will respect your choice not to be contacted. All our marketing email messages contain an option to automatically "opt-out" of receiving messages from us. You may also elect not to receive communication from us by sending an email to info@acl.com with your email address and (if applicable) your postal address to request that we remove your email, address and name from our mailing lists. We will continue to send you messages of a non-promotional nature related to your subscription or account, such as security alerts, maintenance notices, updates, renewal, suspension or activation of your subscription, or notifications to comply with legal requirements or applicable law.

VII. Openness and Access to Information

Upon your written request, we will provide you with a record of information that we have collected about you. There may be some cases where we may not be able to disclose certain information about you if it would mean disclosure of personal information of another person or other confidential information, or if it would compromise our security systems. If you require access to your information, please write to us by fax, email or post, with your request. We will respond to you within thirty (30) days of receiving your request.

VIII. Changes to this Privacy Policy

ACL may change this policy from time to time and will keep the most current version of this policy available on our website. We will notify you if we intend to use your information in a manner not described in this policy. If the changes are substantial or material in our view, we may also post notifications through ACL Launchpad or by emailing users. By continuing to use ACL products, you agree to this policy.

IX. Compliance and Complaints

If you have any questions or concerns with our privacy policy and practices, you may contact us at:

ACL Services Ltd.
1500, 980 Howe Street
Vancouver, BC,
Canada, V6Z 0C8
Attn: Legal Department
Email: legal@acl.com

Tel: (604) 669-4225
Fax: (604) 692-1397

You may also contact the Privacy Commissioner of Canada (for international matters and inter-provincial matters) (<http://www.privcom.gc.ca/>) or the Information and Privacy Commissioner of British Columbia Privacy Commissioner (for British Columbian matters) (<http://www.oipc.bc.ca/>).

This Privacy Policy was last revised in May 11, 2016.