

ACL Privacy Policy

ACL Services Ltd. and its affiliates (“**ACL**”) respect your privacy and are committed to protecting your personal information. ACL has established this Privacy Policy to inform individuals how ACL handles the collection, use, disclosure and storage of personal information.

Personal Information

“Personal information” is generally considered to be any information about an identified individual or that can be used (directly or indirectly) to identify an individual, for example, an individual’s name, e-mail address, phone number, online identifier, IP address or photo. Information that has been anonymized, and from which no individual can be identified either directly or in combination with other data, is not personal information.

How this Privacy Policy Applies

This Privacy Policy applies to the personal information ACL collects about you when you use the “acl.com” and associated websites, or otherwise interact with us.

This Privacy Policy does not apply to:

- Websites, applications, products or services that are operated by companies other than ACL and may be accessed from our websites (such as YouTube, Twitter, Facebook, Instagram or Jobvite), or to business activities or practices of third parties, including our channel partners and resellers. Please consult the Privacy Policies of those third parties for information about their privacy practices; or
- Personal information collected and used in the operation of ACL products and services, unless we use your personal information for our own business purposes, such as direct marketing of our products or for product improvement. Your organization administers and controls your use of ACL products and services, including your personal information and the personal information of others that may be used in connection with the ACL products. Use of such personal information is governed by the applicable agreement(s) for the ACL products and services and is the responsibility of your organization. Please contact your administrator for any privacy questions about your use of ACL products and services.

Personal Information We Collect

ACL collects personal information that you provide to us directly, that we collect automatically when you access and use ACL websites and products, and that is provided to us by third parties or through publicly available sources.

Personal information you provide to us directly includes:

- **Contact Information.** We collect contact information, such as your name, email address, company or organization, job level and function, industry, telephone number and/or country when you fill out online forms, register online, set-up a user account or make a support enquiry.
- **Billing Information.** If you make a purchase, such as an online training course or attendance at an event, we will collect your billing address and payment preferences. If you choose to pay by credit card, your credit card details (number, expiration date, card verification value (cvv)) will be provided directly to our payment processor. We do not keep or store credit card information.

- **Career Information.** We will collect your resume and work eligibility if you submit a job application or sign-up for job alerts through the Careers section of our web site. You may, optionally, provide us with your social profiles (such as Facebook and LinkedIn) and any other information you choose to provide with your application.
- **Other Information.** We collect other information that you provide to us at your option, such as survey responses, contest submissions, user profile information (which may include a photo) or special notes you have asked us to include with your account information.

Personal information collected when you access and use ACL websites or products includes:

- **Log Information.** ACL collects your Internet Protocol ("IP") address, browser type and settings, language preferences, access times, your Internet Service Provider and cookies (see below). Your IP address is a unique 32-bit numeric address that distinguishes your computer from another computer.
- **Device Information.** If you access ACL websites or products through your mobile device, ACL will collect the type, brand and model of device, the operating system and version, unique device identifiers, mobile network information or platform information (to the extent permitted) and device settings, such as screen resolution, browser or mobile input selector (ie, touchscreen, mouse, clickwheel).
- **Product Usage Information.** ACL collects aggregated data about use of the ACL products, including applications and features used, number and size of attached files, number and types of devices used to access ACL products, and content accessed and used. Usage information does not contain any customer data.
- **Cookies and Tracking Information.** Cookies are small data files that are stored on your computer or device by a website. ACL and our analytics partners use cookies and other tracking technologies (ie, web beacons, device identifiers and pixels) to learn about use of our websites, to determine if emails have been opened, and to allow you to access and use the ACL websites or 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. Your browser also provides you the option to delete the cookies from your computer or device at any time.

Personal information provided by third parties or publicly available sources includes:

- **ACL Channel Partners and Resellers.** We collect information you or your organization provide to an ACL channel partner or reseller in order to fulfill your organization's order for ACL products and services.
- **Data Providers.** From time to time, we may collect business contact information and contact lists from third party data providers, provided they have demonstrated compliance with applicable privacy and data protection laws.
- **Social Media.** We may collect contact information you provide to third party social media services and make publicly available (such as LinkedIn).

How We Use Personal Information

ACL uses the personal information we collect for the following purposes:

- **Fulfill Your Requests.** We use your personal information to fulfill your requests to download materials, such as ebooks, webinars, analyst reports or product details; to register for a webinar, event or course; to obtain further information about our products; to access products and services you are authorized to use; to receive job alerts; and to process your purchase and payment.
- **Sales and Marketing.** We use your personal information to provide you with information about our products and services that may be of interest to you, such as new features, newsletters, offers, promotions, contests, and events; to host and carry out events and contests; to improve our websites and web-based services to meet visitor and user needs; and to seek information about your use of our products and services to better understand your needs and as input to future product development or marketing activities.
- **Products and Services.** We use personal information to set up individual user accounts for our customers and verify users' identity for access to ACL products and related resources, such as technical support, online training, tools and templates; to communicate with our customers about their product subscription through emails and in-app notifications to their individual users, including notices regarding scheduled maintenance, updates, security alerts, support and administrative messages and issues concerning use of our products and services; to make it easier to use our websites or web-based services (for instance, by collecting cookies of your email address and password so that you will not need to re-enter your password to log on); and to carry out research and development in order to improve our products and services.
- **Job Applications.** We use your personal information to process job applications made through the Careers section of our web site.
- **Community Forums.** We use your personal information to give you access to our community forums and allow you to create your own user profile. Please be aware that:
 - Your name, title, organization and "about me" information are publicly displayed in the community forums and user groups.
 - Your profile photo will not be publicly displayed unless you choose to show your photo on publicly accessible pages by checking a box for this.
 - Your profile is searchable by other community users and the public, even if they are not part of your organization.
 - Content that you share or post may be seen by other users of the community or the public.

We will also use personal information for other purposes of which we have notified you, or as legally required.

Legal Basis (For EU Individuals)

If you are an individual in the European Union (EU) or the European Economic Area (EEA), the lawful basis for collecting and using your personal information is consent, where you have given consent, or our legitimate interests (which are not overridden by your data protection interests), such as operating our business, understanding and improving our products, direct marketing related to our products and services, hosting events, communicating with our customers and their users about our products, services, events or related resources, improving our websites and protecting our legal rights and interests.

Where consent is the legal basis, you may withdraw that consent at any time. Where we are using your personal information for our legitimate interests, you have the right to object to that use. See below under Your Rights for how to withdraw consent or object. If you have any questions about the lawful basis upon which we collect and use your personal data, please Contact us.

Sharing Your Personal Information

ACL may share your information as set forth below.

- **Vendors and Service Providers.** ACL may share your personal information with third party vendors and service providers who provide products and services that we use to operate our business and carry out the purposes listed above. These include customer relationship management systems, contract signing applications, in-app notifications, website hosting, website analysis, marketing campaigns, email services, event registration, billing and payment processing, cloud-hosted document storage, job applications and alerts, surveys and contests, and other contractors or consultants that work on our behalf. Before sharing your personal information, we ensure that the third parties receiving the personal information have provided appropriate safeguards, and that your privacy rights are protected and preserved.
- **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 personal 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 personal 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 personal 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 personal information, what information was disclosed and why.

Storage and Retention

We retain personal information only for as long as necessary to achieve our stated purposes, or as required by applicable law. After such time, we will delete, archive or anonymize your personal information. We will securely store your personal information until it is deleted.

- **User Account Information** is kept for as long as your user account is active and for a reasonable period after it has been deactivated in the event you or your organization wish to re-activate your user account. User account information may also be retained as necessary to comply with our legal obligations, resolve disputes or maintain our relationship with your customer organization. Credit card information is never kept or stored by us.
- **Career Information** is kept until your job application has been reviewed and may be kept on file as required by law and for future consideration as new job opportunities arise.
- **Log and Device Information** regarding your use of our websites or products will be kept for up to three (3) years.
- **Marketing Contact Information** will be kept after your initial consent until you delete your information or request that we do so. You may opt-out or unsubscribe from our mailing lists and marketing messages at any time by updating your email preferences in your account settings. You may also opt out or unsubscribe from future email communications from a link within each email we send to you.

You may delete your personal information, or request that we do so, at any time. See below under Your Rights for further information on how to do this.

Security and Shared Responsibility

ACL takes reasonable steps to ensure the security of your personal information against loss, misuse and unauthorized disclosure. We have implemented policies, standardized procedures, training, and physical and logical access controls. Our websites and sub-domains are protected by an SSL (Secured Sockets Layers) certificate to ensure all information is transmitted over a secured connection between your browser and our web server. We use PCI compliant third party payment processors to process credit card transactions in a secure manner.

While we follow, and often exceed, industry standards to protect your information, no electronic communication is ever completely secure. You share responsibility for protection of your personal information by keeping your username and password confidential and by changing passwords regularly.

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

International Transfers

Many of the third parties we use to store and process your personal information are located in the United States. If you are located in the European Union, the European Economic Area, Switzerland or the United Kingdom, your personal information will be transferred outside your home country to the United States or to another country where our third party service providers operate.

Before making such transfers, we ensure that the third parties receiving the personal information have provided appropriate safeguards, and that your privacy rights are protected and preserved. Such safeguards may include certification and adherence to EU-US Privacy Shield and Swiss-US Privacy Shield Frameworks, the Standard Contractual Clauses approved by the European Commission, binding corporate rules, or other legal mechanisms to safeguard the personal information being transferred.

Information about the Privacy Shield Frameworks can be found at www.privacyshield.gov

Your Rights

You have certain rights in respect of your personal information. These are set out below.

Correction and Deletion

ACL will make reasonable efforts to ensure that the personal information we collect from you is accurate and complete. You may update, correct or delete your personal information at any time by logging into your user account and modifying your personal information, including your preferences to receive messages from us. You may also update, correct or delete information by contacting us as noted below or by contacting the ACL Support Center (support@acl.com). If you wish to deactivate your product user account, please contact your organization's administrator.

Withdrawing Consent

Where we have relied on your consent to use your personal information, you have the right to withdraw that consent at any time by contacting us as noted below. In addition, all our marketing email messages contain the ability to automatically "opt-out" or unsubscribe from our mailing lists and marketing messages. You may also elect not to receive communication from us by updating your preferences in your account

settings or sending an email to info@acl.com 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 organization's product subscription or your user account, such as security alerts, maintenance notices, updates, renewal or suspension notices, or notifications to comply with legal requirements or applicable law.

Access and Portability

You have the right to request a record of the personal information that we have collected about you. In addition, you have the right to request that we provide that information in a structured, commonly used electronic format for transmission to another company (where applicable and technically feasible). There may be some cases where we cannot provide you with 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 personal information, please Contact Us. We will respond to you within thirty (30) days of receiving your request. We may charge a fee where permitted by applicable law.

Restriction and Objection

In certain limited circumstances, individuals in the EU may request that we restrict our use of their personal information and, where we rely on legitimate interests as the legal basis for using your personal information, you have the right to object to such use. In these cases, we can be required to no longer use your personal information; however, this may mean that certain products, services or information cannot be made available to you. If you wish to exercise your right to restrict or object, please Contact Us.

Complaints

Individuals in the EU have the right to lodge a complaint with a supervisory authority (ie, the independent public authority responsible for monitoring data protection laws in their country). You may also contact the Privacy Commissioner of Canada (for international matters and inter-provincial matters) (<http://www.priv.gc.ca/>) or the Information and Privacy Commissioner of British Columbia (for British Columbian matters) (<http://www.oipc.bc.ca/>).

Contact Us

If you have any questions or concerns about our Privacy Policy and privacy practices, you may contact us at:

ACL Services Ltd.
1500, 980 Howe Street
Vancouver, BC,
Canada, V6Z 0C8
Attention: Privacy Officer
Email: privacy@acl.com

This Privacy Policy was updated May 24, 2018.