



## PRIVACY POLICY

**Last Updated: August 18, 2014**

Loopio Inc. (“we”/“us”) is committed to protecting your privacy. We make the website [www.loopio.com](http://www.loopio.com) (the “Website”) through which Loopio provides access to its software platform having the features indicated on the website from time to time available to provide our services as further described in our Terms of Use [www.loopio.com/terms](http://www.loopio.com/terms) (collectively the “Services”). This Privacy Policy describes how we collect, store, use and distribute information about our users through the Website and Services. Throughout this Policy we use ‘plain English’ summaries which are intended to give you guidance about what each section is about. However, you should still read the entire text completely to understand fully what you are consenting to under this Policy.

### **Consent:**

**If you use the Website or our Services you are agreeing to use of your Personal Information as described in this document. We do not sell customer lists and you can change your mind at any time about use of your Personal Information.**

By using the Website or our Services you consent to the use of your Personal Information as described in this Privacy Policy. Except as set forth in this Privacy Policy, your Personal Information will not be used for any other purpose without your consent. We will not actively collect Personal Information for the purpose of sale or marketing in a way that specifically identifies the individual. In other words, we don’t sell customer lists. You may withdraw your consent to our processing of your Personal Information at any time. However, withdrawing consent may result in your inability to continue using the Website and/or the Services.

### **Collection of Information:**

**We collect personal information like your registration details and non-personal information like usage stats for the Services. This section gives more information about what we collect and how we collect it.**

We aim to collect, use and disclose only such information as is required to enable us to manage your account, to provide the Services, to maintain our customer/visitor lists, to respond to your inquiries or provide feedback, for identification and authentication purposes, to process payments, and for service improvement. We will maintain the confidentiality of any contact information you provide to us on signing up for our Services or contacting us with questions or for further information and we will use it only for the purposes for which we have collected it (subject to the exclusions and disclosures we have listed below), unless you agree that we may disclose it to other third parties.

Two types of information may be collected through the Website and our Services: Personal Information and Non-Personal Information. This Privacy Policy does not extend to the collection, use or disclosure of the following information which is currently not limited by applicable privacy laws: (a) information that is publicly available, such as names, addresses, telephone numbers and electronic address when listed in a directory or made available through directory assistance; or (b) Non-Personal Information (as defined further below).



**"Personal Information"** is personally identifiable information, such as your name, address, e-mail address, credit card information, birth date and gender. At the time of collection, we will clearly identify the information being collected and the purposes for which it will be used. It is always your choice whether or not to provide Personal Information but if you choose not to provide certain requested Personal Information, in some instances you may not be able to register to use the Website or our Services or be able to access and use the Website at all. In other instances, your choice not to provide certain other Personal Information may mean that you will not be able to use certain features of the Website. We may collect Personal Information in respect of the Website through registration processes; communications with you; information downloads; service use; user support; and surveys.

**"Non-Personal Information"** is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access the Website, and the type and version of browser or operating system being used by visitors to the Website or users of the Services. Aggregate information, such as demographic statistics of our users (e.g. average age or geographical allocation of our users), number of visitors, what pages users access or visit, and average time spent on the Website is not considered Personal Information. Similarly, business contact information such as the name, title, business address, e-mail address, or telephone number of a business or professional person or an employee of an organization is not considered Personal Information.

Although the use of certain Non-Personal Information collected, used or disclosed through the Internet as described herein is not restricted (and to the extent that such is the case, the obligations under this Privacy Policy do not apply to such information), we provide information in this Privacy Policy about the collection of such information for the sake of transparency with respect to the operation of the Website. Such Non-Personal Information is collected or derived by us in the course of operating this Website. For example, our web servers may automatically collect Non-Personal Information that is provided through your browser or stored in a cookie when you choose to visit the Website.

#### **Use of Information:**

**This section explains how we use information (both personal and non-personal) through your use of the Website and Services. Mostly we use information to provide and improve the Services.**

We collect information for the following purposes:

- **Registration:** In order to use our Services you must provide certain Personal Information to us such as your full name, company name, email address and phone number. In general, none of your account registration information will be shared with any other users of the Website or our Services who are not in the same company that you are.
- **Transactional Notifications:** We provide notifications for certain activities relating to your use of our Services despite your indicated e-mail preferences, for example we may send you notices of any updates to our Terms of Use or Privacy Policy.
- **Marketing Communications:** If you opt-in to receive marketing communications from us, we will keep you up to date on our products and services. You may withdraw your consent to



receiving marketing communications from us at any time by following the opt-out instructions in each communication, or by contacting us at [support@loopio.com](mailto:support@loopio.com).

- **Feedback:** We use a third-party provider to solicit feedback from you regarding your experience using our Services. If you choose to provide us with feedback, your username, e-mail address, IP address, and the content of your feedback will also be stored by our third-party provider.
- **Statistics:** We also collect statistics about use of the Services purchased through the Website. This information will be kept confidential, however, aggregate statistics that do not personally identify an individual will be kept by us and such aggregate statistics may be made available to other members or third parties.
- **System Logs & Cookies:** Cookies are used by us to track content usage and traffic on the Website. A cookie is a feature of your web browser that consists of a text file that is placed on your hard disk by a web server. The Website uses cookies to help it compile aggregate statistics about usage of this Website, such as how many users visit the Website, how long users spend viewing the Website, and what pages are viewed most often. This information is used to improve the content of the Website. You can set your browser to notify you when you are sent a cookie. This gives you the chance to decide whether or not to accept it. If you disable cookies, you may not be able to take advantage of all the features of the Website.

Your IP address is reported by your web browser whenever you visit a page on the Website. This information is recorded together with your registration information on our databases.

If we plan to use your Personal Information in future for any other purposes not identified above, we will only do so after informing you by updating this Privacy Policy. See further the section of this Privacy Policy entitled '*Amendment of this Policy*'.

#### **Disclosures & Transfers:**

**You have the right to know who we share your personal information with and where your information goes. This section provides information on both disclosures and transfers. In some cases we need to disclose your information without your consent (e.g. to comply with law).**

We have put in place contractual and other organizational safeguards with our agents to ensure a proper level of protection of your Personal Information (see further *Security* below). In addition to those measures, we will not disclose or transfer your Personal Information to third parties without your permission, except as specified in this Privacy Policy (see further *Important Exceptions* below).

As at the date of this Privacy Policy, we share Personal Information about you in respect of the Website and the Service only with our service providers which include our website host, analytics providers, cloud service providers, customer feedback providers and payment processors. We use servers that are located in the United States and accordingly your Personal Information may be available to Canadian and United States government or agencies under a lawful order, irrespective of the safeguards we have put in place for the protection of your Personal Information.



From time to time we may employ third parties to help us improve the Website and/or the Services. These third parties may have limited access to databases of user information solely for the purpose of helping us to improve the Website and/or the Services and they will be subject to contractual restrictions prohibiting them from using the information about our members for any other purpose.

**Important Exceptions:** We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Website members, other users of the Services, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

We may also disclose your Personal Information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

#### **Security:**

**The security of your Personal Information is important to us. This section describes the basics of the types of measures we put in place to protect your information.**

We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

You are also responsible for helping to protect the security of your Personal Information. For instance, never give out your email account information or your password for the Services to third parties.

#### **Retention:**

**This section describes how and why we keep data after our relationship with you is over.**

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained personal information will remain subject to the terms of this Privacy Policy. If you request that your name be removed from our databases, it may not be possible to completely delete all your Personal Information due to technological and legal constraints.



### **Amendment of this Policy:**

**We can change our data practices by updating this document and this section explains that anything significant (e.g. new use of your data) will be posted on the Website. Remember you can always withdraw your consent if you don't like our new practices.**

We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy in the future, we will post an appropriate notice on the Privacy Policy page on the Website located at [www.loopio.com/privacy](http://www.loopio.com/privacy). Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the change is posted and any material changes will become effective 15 days from their posting on the Website. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about you. The date on which the latest update was made is indicated at the bottom of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Website signifies your acceptance of any changes.

### **Access and Accuracy:**

**You have a right to see what personal information we have that relates to you. This section gives details of how to request access and how to update that information.**

You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Information although in certain limited circumstances, we may not be able to make all relevant information available to you such as where that information also pertains to another user. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner. In addition, if you terminate the Services you can request copies of all of your data (including personal data) from us if you make the request within 30 days of termination. After the 30 day window we may have deleted your account and all data except for any information we are legally required to retain.

We will make every reasonable effort to keep your Personal Information accurate and up-to-date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

### **Contact Us:**

**Have additional privacy questions or need further info? This section is about how to contact us.**

You can help by keeping us informed of any changes such as a change of address or telephone number. If you would like to access your information, if you have any questions, comments or suggestions or if you find any errors in our information about you, please contact us at: [privacy@loopio.com](mailto:privacy@loopio.com)