



*"Automating Telecommunications"*

## OUR PRIVACY POLICY

Your privacy is important to us. Engenic complies with the provisions of the Personal Information Protection Act of BC:

[http://www.bclaws.ca/EPLibraries/bclaws\\_new/document/ID/freeside/00\\_03063\\_01](http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_03063_01)

We prepared this Statement of Privacy and Security ("Statement") so that you may better understand how Engenic uses and protects your personal information. Please take the time to review this page and contact us at [privacy@engenic.com](mailto:privacy@engenic.com) with any questions or concerns.

Note that this is a general policy governing the use of all Engenic's web sites. If you have entered into a contract for service with Engenic, and your contract includes a privacy schedule, that schedule supercedes the information in this Statement for as long as the contract is in effect.

For our Hosted Application sites (currently StaffRelay.net and Engenic.net) special policies apply. See the section in this Statement entitled "Hosted Application Sites" for details.

## COLLECTION OF INFORMATION

### Personal Information

Engenic may ask you to register and provide personal information, such as when you purchase products from our online store, download software, register new products, access product information, features or programs, enter a contest or sweepstakes, or sign into a page that requires authorization. Engenic may also collect credit card information to bill you for products and services that you purchased.

This personal information may include your name, e-mail address, user ID, domain name, URL, mailing address, and telephone number. Engenic may also collect demographic information such as your age, gender, zip code/postal code, education level, household income, operating system, preferences, interests, favorites, and whether you are a personal or business user. Providing demographic information is optional, and not all sites collect all information. If you choose not to register and provide this information, you can still use most of Engenic's web sites. Unfortunately, you will not be able to access areas that require registration.



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In addition, when you choose to use our referral service to tell a friend about our site, we will be asking for your friend’s name and e-mail address. Engenic will automatically send your friend a one-time e-mail inviting him or her to visit the site. Engenic does not store this information and only uses it for the sole purpose of sending this one-time e-mail.

Some general demographic information you provide may be shared with potential partners, but in no case will that information include specific personal data. Any financial transactions will be processed using a secure connection (SSL) and any data gathered during those sessions will not be used for any other purposes than to verify and validate the transaction.

### Children's Personal Information

We do not knowingly collect personally identifiable information from users under the age of 13. If we are made aware that we have such personal information, we will take reasonable steps to delete that information.

### Cookies

Engenic’s web sites make use of “cookies”, small amounts of information, stored in plain text files, by your web browser on your computer. Engenic only uses cookies so that our web sites can “remember” certain settings, such as your login status, areas of our website you have visited, and data collected from you to use certain features. You can set your browser to refuse cookies, or notify you when a cookie is sent so that you can accept or refuse them individually, but note that certain features of our web site(s) might not work without them. If you are concerned about the cookies, we recommend you delete the cookies after visiting our site(s) or use your browser’s private browsing setting (called “InPrivate” in Internet Explorer, “Private Browsing” in Firefox and Safari).

### System Configuration Information

Engenic automatically collects on our server certain information about your computer hardware and software when you visit our web site or use Engenic’s online services. This information may include such things as your IP address, cookie information, globally unique identifier, system, operating system, a description of any Engenic products connected and how such products are used, browser type, domain names, access times, service provider and referring web site addresses. This information does not include personally identifying data and will not be used to attempt to identify you.



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### Web Site Usage Information

Engenic may track information about how you use our web sites through cookies, globally unique identifiers, Internet tags or web beacons, and navigational data (log files, server logs, click stream). These allow us to monitor how users interact with Engenic online with the sole purpose of improving the service for our users. With your permission, we can tie this information to your personal information to help us tailor communications to you. Engenic may also keep track of the pages you visit within our web sites and any transaction details (downloads, orders, requests, or referrals).

### Errors in Information

Engenic is not responsible for typographical or photographic errors that may appear on any web site or PDFs. We reserve the right to make adjustments or corrections due to errors, changing market conditions, product discontinuations, or typographic or photographic errors in advertisements or product descriptions. Policies, solution availability and prices are subject to change.

If your personal information is inaccurate or incomplete, you may request a correction by writing to our Privacy Officer. The contact information is provided at the end of this Statement.

### HOSTED APPLICATION SITES

Engenic offers certain complete solutions via our Hosted Application Sites (currently StaffRelay.net and Engenic.net, others are expected to follow). By subscribing to one of these solutions, you are entering a relationship with Engenic Corp. and establishing lines of communication between yourself and the applicable site. Additional privacy measures apply to such sites and are explained in this section.

Personal information we gather from you will be used solely for the fulfillment of the purpose of the hosted solution. In some cases, Engenic makes use of third party vendors to fulfill the solution, or provide ancillary services; for example, we use a third party contract to provide an optional live-agent call centre component to StaffRelay. Any third party vendors we use have entered into a privacy agreement with Engenic, no less strict than our then current privacy policy. We share with the third party vendor only the information necessary for them to complete their function in the overall solution.



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From time to time Engenic may ask subscribers of our solutions to complete surveys that we use to improve our product features, and develop new solutions. These surveys will always be voluntary invitations.

Other than information shared with authorized third party vendors, Engenic will not disclose any personally identifying information without your express permission, unless we are required to by law enforcement or otherwise provided for by law. Engenic may also disclose subscriber information in special cases when 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) Engenic's rights or property and/or the rights of other subscribers.

Personal Information on our Hosted Solution Sites is always stored within Canada. By using such a site from outside of Canada, you consent to any such transfer of information to Canada. Any transmission of information is protected through the use of encryptions, such as the Transport Layer Security (TLS) or Secure Sockets Layer (SSL).

## HOW WE USE YOUR INFORMATION

### Personal Information

With your express permission, Engenic may collect, integrate, and use your personal information to help enhance and personalize your use of our web site, products and services. This will enable the following: (1) you to quickly find software, services or information on your unique administrative site, (2) Engenic to create web site content and other services most relevant or customized to you, (3) for you to be alerted about product and web site upgrades and updates, special offers, promotions, newsletters, latest product announcements, upcoming events, programs and other new services from Engenic; and (4) to invite you to participate in product and service surveys or programs. Engenic uses this information to communicate with you either via the Internet, e-mail, mail or telephone only after you give your express permission for such communication. (The only exception to this Statement are “service e-mails” that may notify you about system downtimes, product problems or recalls, password reminder e-mails, etc.)

We also use anonymous and aggregated data to create statistics and reports for various business purposes. We may aggregate anonymous data and share the



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anonymous data with our co-marketing partners in order to offer all our customers potentially desirable products and services as well as to improve our content and services.

We occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of mailings, providing customer support, processing transactions or performing statistical analysis of our services. We will only provide those companies the personal information (such as e-mail address) that they need to deliver the service. Our service providers are required to maintain the confidentiality of your information and are prohibited from using that information for any other purpose.

From time to time we supplement the information we collect from the site with information from offline or third party sources. We use this information to enhance or overlay the “profile” of customers and business contact information. This supplementary data is therefore tied to corporate contact information and in some cases personally identifiable information. We also may internally compare lists collected from our other sites or within our family of companies to remove duplicate entries.

Engenic will periodically send our registered users e-mail messages about our products and services. When sending you e-mail, we may use an image called a single pixel GIF that allows us to format messages tailored to your computer’s capabilities. We also use this technology to determine, in the aggregate, how many people open our e-mails. When you initiate a response by clicking on a link within an e-mail, you are redirected onto the Internet. We then record your individual response to help us deliver information that is more relevant to your interests.

#### Storage of Information

With the exception of Hosted Application Sites, Personal information collected on this site may be stored and processed in Canada, the United States or any other country in which Engenic or its affiliates, subsidiaries or agents maintain facilities. By using this site, you consent to any such transfer of information outside of your country.

For information on the storage of Hosted Application Site data, see the relevant section above.



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### Disclosure of Information

Engenic keeps your personally identifiable information confidential. We do not disclose it to third parties or others that do not have a need to know such information except under certain circumstances, as set forth below:

- Certain of our employees, independent contractors and service providers may have access to your personally identifiable information necessary for the sole purpose of helping us run our business. These employees and contractors have confidentiality and security obligations no less strict than our then current privacy policy.
- We may disclose your personally identifiable information to another business entity should we plan to merge with or be acquired by that business entity; or to any organization involved in a merger, transfer, or sale of our assets or business.
- If you post any information in public areas of our web site, such as chat rooms and message boards, it will be available to the public and we may reuse and republish such information at our discretion and in accordance with our Terms of Use.
- To protect and defend the rights or property of Engenic, including its web sites.
- We may also share your personally identifiable information to respond to law enforcement requests, court orders or other legal processes or if we believe that such disclosure is necessary to investigate, prevent or respond to illegal activities, fraud, physical threats to you or others, national security threats or as otherwise required by any applicable law or regulation.

In the event that we disclose your personally identifiable information as set out above, we will require third party organizations that have access to your personally identifiable information to protect and maintain your personally identifiable information in compliance with the terms and conditions of this Statement.

Unless required not to by law, we will inform you of any disclosure of your personally identifiable data. If appropriate and permitted under the law, we will first obtain your consent, for example via e-mail, click-through, an online opportunity to opt-out, or otherwise, before we disclose your private information.

### Prohibited Disclosures

Except as set forth above, Engenic will not disclose your personally identifiable information to any third party, including advertisers, without your explicit



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consent. In addition, Engenic will not share, trade, rent, or otherwise disclose your personal information, Engenic’s e-mail list or address list to third parties for their promotional purposes.

## PROTECTION OF INFORMATION

Engenic is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. For example, we store personal information you provide on computer systems with limited access. These systems are located in controlled facilities. When we transmit confidential information (such as a credit card number) over the Internet, we protect it through the use of encryption, such as the Transport Layer Security (TLS) or Secure Socket Layer (SSL) protocols.

## CONTROL & REVIEW OF YOUR PERSONAL INFORMATION

When you register or sign up for a service, Engenic offers choices for the collection, use and sharing of personal information. In addition, you may also stop the delivery of future communications including newsletters, special offers and updates from Engenic by unsubscribing at any time. In most instances, each email you receive contains instructions explaining how to stop receiving such e-mails. You may also contact us using any of the vehicles listed below to opt-out.

If you have questions or complaints regarding this Privacy Statement, you may contact our Privacy Officer at [privacy@engenic.com](mailto:privacy@engenic.com). Additional contact details are provided at the end of this statement.

If your personal information changes (such as zip/postal code, phone, or e-mail or postal address), or if you no longer desire our products or services, we provide a way for you to change or delete/deactivate it. This can be done by contacting us at [sales@engenic.com](mailto:sales@engenic.com). Engenic will respond to your request to review the information we have on file for you within 30 days from receiving such request.

We provide you the opportunity to “opt-out” of having your personally identifiable information used for certain purposes, when we ask for this information. For example, if you purchase a product and/or service but do not



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wish to receive any additional marketing material from us, you can indicate your preference on our order form.

#### CHANGES TO THIS STATEMENT

Engenic will occasionally update this Statement. If there are material changes to this Statement or in how Engenic will use your personal information, Engenic will prominently post such changes. We will not make any changes that are less protective of your personal information collected in the past without your consent. Engenic encourages you to periodically review this Statement to be informed of how we are protecting your information.

Thank you for your interest in Engenic and our products and services.

#### Privacy Officer

Engenic Communications Solutions Corp.

Email: [privacy@engenic.com](mailto:privacy@engenic.com)

Phone: +1 604 639 6391

Postal Mail:

Engenic Privacy Officer,  
618- 1111 Melville Street,  
Vancouver, BC V6E 3V6  
Canada

Corporate web site: <http://www.engenic.com>

Revised July 17, 2012