



UPLevel Privacy Statement

Privacy is very important to UPLLevel. The purpose of UPLLevel's Privacy Policy is to describe:

- (a) How and why UPLLevel collects, uses, and may disclose your Personal Information;
- (b) How and when your consent will be requested and when your Personal Information may be collected, used, or disclosed without your consent;
- (c) How Personal Information that UPLLevel holds about you may be accessed, rectified, or de-indexed, or if you wish to no longer have your Personal Information disseminated; and
- (d) Who to contact if you have questions or concerns about the collection, use, or disclosure of your Personal Information.

This Policy is UPLLevel's commitment to privacy. Please read the Policy to understand how your Personal Information is treated.

This Policy will be reviewed from time to time as privacy law changes, or users and requirements change, so please check back periodically.

4.1 How UPLLevel collects your Personal Information

UPLevel collects your Personal Information to provide you with products and services. UPLLevel's collection of Personal Information is limited to what is necessary for the purposes identified to you.

Personal Information collected by UPLLevel may include:

- (a) contact information, such as your name, company name, address and/or billing address, phone/fax numbers, e-mail address;
- (b) billing information such as credit card information or bank account information, tracking information from cheques and money orders;
- (c) client information; and
- (d) details regarding your business transactions and communications with us.

4.2 How UPLLevel obtains your consent to collect, use, or disclose your Personal Information

Where required by law, UPLLevel will obtain your express consent to collect, use, or disclose Personal Information. The purpose for which the Personal Information is being collected will be provided.

In certain circumstances, UPLLevel may imply your consent or rely on one of the following exceptions to collect, use, or disclose Personal Information without your consent, such as:

- (a) where the use or disclosure of Personal Information is consistent with the purpose for which it was collected, including if the use or disclosure is necessary to provide a product or service requested by you;
- (b) where the collection, use, or disclosure of Personal Information is clearly for your benefit and consent cannot be obtained in a timely manner;
- (c) where the collection, use, or disclosure of Personal Information is necessary to:
 - (i) prevent or detect fraud;

- (ii) investigate a breach of an agreement or the breaking of any laws;
- (iii) comply with a subpoena, warrant, court order, or rules of court;
- (iv) assess and improve protection and security measures;

(d) to collect a debt owed by you to UPLLevel; or

(e) if required by law.

4.2.1 Withdrawal of consent

You may withdraw your consent for UPLLevel to use or disclose your Personal Information, subject to any legal or contractual restrictions that UPLLevel may have.

4.3 How UPLLevel uses your Personal Information

UPLLevel collects information throughout its website, including statistics, domain names and/or IP addresses to help diagnose technical problems, administer its website and to provide you with information on products or services that might be of interest to you. UPLLevel retains the content of e-mails sent, your e-mail address and UPLLevel's responses to handle any follow-up questions you may have.

UPLLevel uses your contact information and areas of interest information in the normal course of business to build your account with UPLLevel, send you requested information, provide you with UPLLevel products and/or services, personalize the delivery of website content to you, or contact you when necessary. Personal Information is required to identify you as a customer and to provide you with access to our products and services and other products and services we feel might be of interest to you. Billing information and client information is used to bill you for products and services that you request.

In order to provide you with the best service, it may be necessary for UPLLevel to share your Personal Information you have provided with third parties, such as UPLLevel's affiliated companies, government registries, credit reporting agencies, or suppliers who assist in providing UPLLevel's services and products. As part of UPLLevel's operations, these third parties may have access to your Personal Information. If you are a Quebec resident, please note that your Personal Information may be communicated outside of Quebec.

4.3.1 Limits on the use of your Personal Information

UPLLevel will only use your Personal Information for the purposes for which it was collected, subject to the exemptions listed in section 4.3. UPLLevel will retain your Personal Information only as long as is necessary to fulfill the purposes for which it was collected, with the exception of any contractual or legal obligations. Subject to the exemptions listed in section 4.3, UPLLevel will not use or share your Personal Information in ways unrelated to the purpose for which it was collected without also providing you with an opportunity to opt-out or otherwise prohibit such unrelated uses.

4.3.2 Aggregating Information

UPLevel may use Personal Information and data collected to generate statistics and aggregate reports for internal use, such as new product development, marketing, and sharing with affiliates, subsidiaries, licensees, content suppliers, successors and advertisers. These statistics and aggregate reports will not contain any personally identifiable information; data will be de-identified.

4.3.3 Cookies

Cookies are pieces of information that a website transfers to your computer's hard drive for record keeping purposes. UPLLevel's use of cookies allows you to enter your password less frequently and allows UPLLevel to personalize your online interaction. The use of cookies is industry standard used to provide useful features to customers. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. With most Internet browsers you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is used. Please refer to your browser instructions or help screen to learn more about these functions.

4.4 Disclosure of your Personal Information

UPLevel may disclose your Personal Information without your consent where such disclosure is:

- (a) consistent with the purpose for which it was collected, including if the disclosure is necessary to provide a product or service requested by you;
- (b) where the disclosure of Personal Information is clearly for your benefit and consent cannot be obtained in a timely manner;
- (c) where the disclosure of Personal Information is necessary to:
 - (i) prevent or detect fraud;
 - (ii) investigate a breach of an agreement or the breaking of any laws;
 - (iii) comply with a subpoena, warrant, court order, or rules of court;
 - (iv) assess and improve protection and security measures;
- (d) necessary to collect a debt owed by you to UPLLevel; or
- (e) if required by law.

4.5 Accessing your Personal Information

You may request access to your Personal Information held by UPLLevel, and UPLLevel is required to respond to you within thirty (30) days. If UPLLevel cannot provide you with access to your Personal Information, it will advise you of the reason why.

4.6 Rectifying your Personal Information

UPLevel aims to keep your Personal Information accurate, up-to-date and complete. If you find an error or inaccuracy, please contact UPLLevel and ask that it be corrected.

4.7 Requesting that your Personal Information be de-indexed or no longer disseminated

If you are a Quebec resident, you may request that UPLLevel stop disseminating your Personal Information or de-index any hyperlink attached to your name that provides access to your Personal Information if the dissemination is not lawful or defies a court order. In other circumstances, UPLLevel will evaluate your request according to criteria established by law.

4.8 Safeguarding Personal Information

UPLLevel has security measures in place to protect the loss, misuse and alteration of Personal Information under its control. UPLLevel has adopted appropriate safeguards to ensure that Personal Information is secure against disclosure, loss, theft, unauthorized access, copying, use or modification. Such safeguards include physical measures, such as restricting access to offices and filing cabinets, organizational measures, such as limiting access to Personal Information on a "need to know" basis and technological measures such as using passwords and encryption. Our Employees are aware of the importance of maintaining the confidentiality of Personal Information.

As the Internet is not a secure medium, UPLLevel cannot guarantee that its safeguards will always be totally effective particularly in cases of fraudulent conduct or fraudulent concealment, provision by third parties of incorrect data, willful actions by third parties to corrupt or tamper with databases and/or the data, and other such actions or occurrences.

4.9 Links to other websites

UPLLevel may provide weblinks to resources UPLLevel believes may be useful to you. These links will lead you to websites operated by different organizations with different privacy practices. UPLLevel is not responsible for the privacy practices or the content of such websites.

4.10 How to contact UPLLevel

Our goal is to protect your privacy. If you have any questions, comments or concerns about this Policy, please contact the Privacy Officer at privacy@uplevel.ca.

Effective September 22, 2023

Version 2