



RI – Privacy Code

RESPONSE INNOVATIONS PRIVACY CODE—Updated July 28, 2020

Personal information plays an integral part in the services that Response Innovations Corp. (RI) provides, and as such we have a heightened awareness of its importance, its use and its protection. We at RI are committed to respect and protect personal information supplied to us by our clients.

RI hereby acknowledges that it does have a formal privacy code on the collection, use and disclosure of personal information and that policy is as follows:

Our privacy code is governed by the Federal government’s Personal Information Protection and Electronic Documents Act (PIPEDA) and we abide by the 10 fair information principles that create the foundation of PIPEDA:

- Accountability
- Identifying Purposes
- Consent
- Limiting Collection
- Limiting Use, Disclosure and Retention
- Accuracy
- Safeguards
- Openness
- Individual Access
- Challenging Compliance

RI is also a member of, and as such follows the privacy code and guidelines of, the Canadian Marketing Association.

ACCOUNTABILITY

Response Innovations Corp. has appointed a Privacy Officer who can be contacted at the number listed below. RI continues to evolve and improve its privacy policies as well as train all staff about the importance of protecting personal information and its legal obligations under PIPEDA.

Margaret Proctor
Privacy Officer
256 Adelaide St. E. Toronto, ON M5A 1N1
(416) 368-5098
mproctor@responseinnovations.com

DATA COLLECTION & USAGE

We will limit the information we collect directly from you to what we need for specific purposes, and we will use it only for those purposes. We will obtain your express consent if we wish to use your information for any other purpose.

We may use a variety of technologies that automatically or passively collect information about how you interact with our websites and electronic communications (“Usage Information”). Usage Information may include: (i) your IP address, which is a unique set of numbers assigned to your computer by your Internet Service Provider (ISP) (which, depending on your ISP, may be a different number every time you connect to the Internet); (ii) the type of

browser and operating system you use; and (iii) other information about your online session, such as the URL you came from to get to our Websites and the date and time you visited our Websites. In addition to using this information from our log files to better understand how our websites and electronic communications are used, we may use this information to troubleshoot technical problems, maintain online safety and security, and if necessary, prohibit or restrict access to our online services.

As a marketing service provider, RI may also have access to personal and other information of your customers. We employ the same principles of limiting access to the minimal information required to provide services to our clients, with the appropriate consent and in accordance with applicable laws/regulations.

DATA SHARING

We may share personal information about you, and other information collected about you for everyday business purposes, including:

- **With Our Service Providers.** We may share your information with our third-party service providers to allow them to provide services to us (such as data analysis, surveys, data hosting, information technology, payment processing, customer support, warranty services, email delivery, physical mail delivery and auditing).
- **Legal Disclosure:** We also may use or disclose your information if necessary: (1) to comply with laws, regulations, court orders and subpoenas or similar requests for information by authorities, or as required by law; and (2) to protect your safety and the safety of others, such as a fraud prevention or investigation activity.

We may share your customer information with your designated service providers for business purposes that you have approved.

DATA PROTECTION

We are committed to maintaining the security of the data you provide to us, including data about your customers that you have shared with us. We use reasonable organizational, technical, and administrative measures designed to protect your information within our organization. We also seek to use third-party service providers capable of protecting the information they maintain or process for us.

We will retain your information, including data about your customers that you have shared with us, only for the time it is required and for the purposes we explained to you.

DATA ACCESS

You may review, correct, or update your information by contacting us as set out above. We may retain backup copies of your information for as long as necessary to assist with any legal obligations, resolve disputes, and enforce our agreements.

As a marketing service provider, we may also process your information supplied to us by one of our clients. If your personal information has been submitted to us by our client and you wish to exercise any rights you may have under applicable data protection laws, please inquire with the client directly.