

SIMPLISTA CANADA INC. PRIVACY POLICY

This Policy explains how Simplista Canada Inc. (referred to as “we,” “us,” or “our”) collect, use, retain, share and delete (collectively, “**process**”) your Personal Information. Please contact our Chief Privacy Officer at info@simplista.com if you have any privacy questions.

Please read through this Policy carefully. By using our services or by sending us Personal Information, you agree to the processing of your Personal Information in accordance with this Policy. Please note that you may refuse your consent by not using our services. You may also later withdraw your consent, but if you do so, we may not be able to provide you or continue providing you certain services or responses.

This Policy is effective: **November 15, 2021** and was last revised on **March 27, 2023**.

1. What is Personal Information?

“**Personal Information**” is broadly defined to include all information that identifies or could reasonably be linked, directly or indirectly, with a particular individual. Personal Information could be as simple and direct as your name, but it could also be less explicit like how a certain individual interacted with a website or an advertisement.

2. What Personal Information do we collect, and How and Why We Collect It?

We collect Personal Information directly or indirectly from you for the following reasons and we use it the ways described below:

How & What We Collect	How We Use It
<p>Registering an Account: When you create an account on our cloud-based business-to-business product listing platform (the “Platform”), we will collect your <i>name</i> and <i>email address</i> from you.</p> <p>Alternatively, the customer who has purchased access to the Platform (the “Customer”) may provide us your Personal Information, such as your <i>name</i> and <i>email address</i> for account registration or account authentication purposes for our Platform.</p>	<p>We use this information to allow you to log-into our Platform.</p>
<p>Application for Employment: We collect Personal Information from you when you submit applications for employment. The categories of Personal Information will be listed on the application form.</p>	<p>We use this information to make a decision about your employment application.</p>
<p>Social Media: If you engage with our online communities, including interacting with our social media pages, submitting content, leaving reviews, or otherwise entering information into comment fields, blogs, message boards, events, and other community</p>	<p>We use this information to validate your identity and respond to your inquiry.</p>

forums sponsored by or affiliated with us, we may collect certain Personal Information about you, including your social media public identification and any other Personal Information you provide us.	
<i>Support and Customer Service:</i> If you contact us, for example, through our website located at https://www.simplista.com/webapp/ (our “Site”), through phone, or through email, we may collect certain Personal Information about you, including your name, address and telephone number.	

3. Automated Collection of Data

On our Site, we do not use any automated means (e.g., cookies, Clear GIFS, Google Analytics) to collect your Personal Information.

On our Platform, we use your local storage and strictly necessary authentication cookies to ensure you are authorized to access it. Additionally, our Platform automatically gathers traffic patterns, usage information, and other aggregated data. This aggregated usage data does not identify you individually. We gather this information to evaluate how you and others use the Platform. We may share anonymous, aggregated statistics about visitors to our Site with others outside our company, such as the Customer, or we may allow third parties to collect aggregate data through our Site for our benefit.

4. How We Share Your Personal Information

We do not sell Personal Information.

We will not share your Personal Information, except:

- (a) In the case of the Platform, to the Customer who has authorized your access to the Platform;
- (b) To third parties that host our server infrastructure, and to third parties performing clearly defined sub-processing or sub-contracting functions on behalf of us, including, but not limited to, the following types of third parties:
 - (i) developers that work with limited sets of Personal Information in a non-production environment to test new code to improve the Site or Platform; and
 - (ii) third parties that assist us in analyzing data and creating aggregated reports, which are shared with the Customer;

Any processing of your Personal Information by third parties will be protected by non-disclosure agreements;

- (c) Where we are required by law to disclose Personal Information;
- (d) In connection with any legal proceedings or prospective legal proceedings, including in order to establish, exercise, or defend our legal rights;
- (e) to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling. We will require any person or entity to whom we provide your Personal Information to agree to comply with our then current Privacy Policy. We will take reasonable commercial efforts to ensure that they comply with our Privacy Policy; and,
- (f) in the event of a transfer of our ownership or assets, or our bankruptcy.

In addition, since we do not collect information from visitors who are under 14 years old, no such information is disclosed to third parties.

5. Anonymized Data

We may create de-identified or anonymized data from Personal Information that you provide to us by excluding data components (such as your name, email address, and IP address) that makes the data personally identifiable to you. Anonymized data is no longer considered Personal Information and is not subject to this Privacy Policy.

6. Transfer of Personal Information

Please note that we process all Personal Information in Ontario. In the event we transfer Personal Information to a sub-processor or sub-contractor located outside of Ontario, we will ensure such transfer complies with applicable law.

7. Children's Personal Information Policy

We do not knowingly collect or retain any Personal Information in regard to anyone under the age of 14. If we learn that we have collected or received Personal Information from a child under 14, we will promptly delete that information from our database and all other media.

8. How We Protect Your Information

To protect your Personal Information against accidental or unlawful destruction, loss, use, or alteration and against unauthorized disclosure or access, we and our sub-processors use appropriate physical, technical, and organizational security measures

9. Do Not Track

We do not track our Site's and Platform's visitors over time and across third-party websites to provide targeted advertising. Therefore, neither the Site nor Platform respond to Do Not Track (DNT) signals.

10. Your Privacy Rights

You have the following rights with respect to the Personal Information that we collect, use, or share:

Right to be Informed	The right to be informed about the collection and use of your Personal Information.
Right to Access	The right to be provided with a copy of your Personal Information held by us.
Right to Correct	The right to ask us to correct your Personal Information if it's inaccurate or incomplete.
Right to Withdraw Consent	The right to withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.
Right to De-Index or stop Dissemination	The right to request the cessation of dissemination or de-indexation, subject to limitations.
Right to File a Complaint with the Privacy Commissioner	The right to complain about the breach of your rights.

To exercise your rights or to determine what rights you may have, you or your authorized agent may reach out to our CPO by email at info@simplista.com.

If you're not satisfied with our response, you may complain to your respective Privacy Commissioner. If for whatever reason you're unsure of how to contact the Privacy Commissioner or who your Privacy Commissioner is, let us know, and we'll endeavor to help you.

11. Data Retention and Your Rights to Access and Correction

Depending on your request and the method of contact, we may ask you for Personal Information that we consider necessary to verify your identity to prevent fraud. This information may include name, contact information, and information related to your relationship with us, but the specific information requested may differ depending on the circumstances of your request.

(a) Your Right to Access

The disclosure of information will be provided at no cost to you.

We reserve the right to decline your request where the information requested:

- would disclose Personal Information of another individual or of a deceased individual;
- is subject to legal privilege;
- does not exist, is not held, or cannot be found by us, could reasonably result in serious emotional harm to the individual or another individual, or serious bodily harm to another individual; or,
- may harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by statute to perform such functions.

In addition, we reserve the right to decline your request if the request is manifestly unfounded or excessive, and we quote you a reasonable fee for responding to your request, but you refuse to pay that fee.

Lastly, we also will not disclose the Personal Information where applicable law would bar such disclosure.

(b) Your Right to Update or Correct Your Information

You may in most cases correct or update your Personal Information by instructing us to do so on your behalf.

(c) Data Retention

We do not hold onto your data for forever. Instead, our default is to retain your Personal Information for up to 7 years (depending on the type of Personal Information and our uses for it) after it was no longer necessary for the purposes for which it was collected, unless a legal obligation would require the Personal Information to be held for longer.

12. INDIVIDUALS OF THE EUROPEAN ECONOMIC AREA

In addition to the common rights granted to all those who provide us with Personal Information, the European General Data Protection Regulation (GDPR) provides the following additional rights to individuals in the European Economic Area:

- **Right to erasure (Art. 17 GDPR):** You have the right to ask us to delete your Personal Information, as permitted by law.
- **Right to restriction of processing (Art. 18 GDPR):** You have the right to request the limiting of our processing under limited circumstances.
- **Right to data portability (Art. 20 GDPR):** You have the right to receive the Personal Information that you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that information to another controller, including to have it transmitted directly, where technically feasible.
- **Right to object (Art. 21 GDPR):** You have the right to object to our processing of your Personal Information, as permitted by law.
- **Right not to be subject to a decision based solely on automated processing (Art. 22 GDPR):** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning or significantly affecting you, as permitted by law.
- **Right to lodge a complaint before the Data Protection Authority (Art.77 GDPR):** We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of Personal Information relating to you infringes applicable data protection laws.

13. Withdrawing your Consent

Where you have provided your consent to the processing of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at info@simplista.com. Please note that if you withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision. It may take up to 7 business days to fulfill your request.

Please note that despite your withdrawal, we may continue to process your Personal Information (i) to the extent that we are contractually obligated to do so, (ii) to the extent necessary to enforce any contractual obligations you may have with us, and (iii) for any other legitimate purpose (including fraud prevention) permitted by applicable law.

14. We May Change this Privacy Policy

In order to maintain or enhance our services it might be necessary to change this Privacy Policy from time to time. We reserve the right to modify this Privacy Policy at any time, subject to applicable data protection laws. Please visit the Site or the Platform from time to time for information on updates to this Privacy Policy.

15. Governing Law

This Privacy Policy will be governed by the laws of Ontario, Canada, excluding its conflict of laws rules.

16. Data Privacy Contact

If you have any questions regarding this Privacy Policy or our privacy practices or our sub-processors, or if you require assistance to withdraw your consent to our sub-processing of your Personal Information or wish to access or correct your Personal Information, please contact us by sending an email to info@simplista.com or in writing to 2300 Yonge Street, Suite 1600, Toronto, Ontario M4P 1E4. Attention: Chief Privacy Officer.