

Avancie Privacy Policy

Effective date: September 22, 2023

Update: January 5, 2024

Introduction

As a company incorporated and domiciled in the Canadian province of Quebec that collects personal information through technological means (such as electronic forms, e-mails, etc.) in the course of carrying on its enterprise, Avancie Inc. is required to post on its website, in plain language, a privacy policy and notices of any changes to that policy. The information on this web page is intended to meet this requirement.

ON THIS PAGE

- **Who collects personal information?**

For personal information under its control, Avancie Inc ("**Avancie**"), registered in the Quebec Enterprise Register under number NEQ1165131302, is the person who collects the personal information you transmit through any of the technological means mentioned on this page, notably via an electronic form published on an Avancie web site or to an e-mail address using the domain name <avancie.com>.

In the case of personal information that is in the possession or custody of Avancie's clients or principals and that is collected by means of tools, services or IT solutions provided to them by Avancie, each of them independently decides to collect such information and establishes the purposes for which it is collected, used or disclosed. With respect to such personal information in the possession or custody of such clients or principals, reference should be made to their respective privacy policies, to which this Avancie Privacy Policy does not apply.

- **Categories of personal information collected:**

In the course of one or more of its commercial activities, including the establishment or maintenance of business relationships, Avancie may collect and process various categories of personal information concerning visitors to its websites and individuals within its clients' organizations:

<i>Categories</i>	<i>Examples of information</i>
Contact information	Profession, occupation, position, function or title, work address or telephone/fax numbers, work e-mail address, etc.
Demographic information	Age, gender, date of birth, preferred language, etc.
Professional information	Position, enterprise, business sector, company size, etc.
Financial information	Billing information, bank details, transaction history, etc.

Technical information	IP address, browser type and version, operating system, screen resolution, device information, etc.
Information on the use of Avancie websites and software-as-a-service	Pages visited, duration of visits, clicks, interactions with the site and services, browsing history, etc.
Login and authentication information	Login (client or account), encrypted password or other authentication, connection history, etc.
Geolocation information	Approximate geographic location based on IP address or GPS data, if enabled.
Information on social networks	Social network identifiers, public profile information, interactions with Avancie content on social networks, etc.
Personal interests and preferences	Communication preferences, product or service interests, centers of interest, etc.
Information provided voluntarily by the individual concerned	Comments, questions, testimonials, suggestions, requests for assistance, etc.
Information collected through cookies and similar technologies	Device identifiers, browsing preferences, etc.

- **Purposes for which personal information is collected**

Acceptable Purposes: Avancie collects, uses or discloses personal information only for purposes and in a manner that a reasonable person would consider appropriate in the circumstances.

Identifying Purposes: Avancie identifies and documents the purposes for which personal information under its control is collected, used or disclosed at or before the time the information is collected.

New Purpose: If Avancie determines that the personal information it has collected will be used or disclosed for a new purpose, it will document that purpose before using or disclosing the personal information for that purpose.

Purposes: Avancie may currently collect and process personal information for the following purposes:

Subject	Description
Improvement	To provide and improve our products and services to meet your needs and expectations;
Analysis and monitoring	To analyze and monitor the use of our website and services to improve their performance and security;
Compliance	Meet its legal and regulatory obligations, including responding to requests from competent authorities;
Contact	Business contact information that allows you to contact or facilitate contact with an individual in the context of his or her employment, enterprise, or profession.
Development	Conduct of market research and analysis to develop new products and services and improve existing ones;
Management	Manage and administer your account and transactions, including processing invoices and payments;
Information	Communicate with you to inform you about updates to our products and services;
Commercial e-mails	To send, cause to be sent or permit to be sent commercial electronic messages complying with legal and regulatory requirements, including newsletters and communications promoting Avancie and its services or intended to build customer loyalty;
Personalization	To personalize and improve your user experience on its websites and with its services;
Service	Execute all service contracts
Prevention, detection and defense	Prevent, detect, and counter fraudulent, illegal or unauthorized activities, and protect the security of Avancie's uses, rights and assets;
Business relations	Establish or maintain business relationships
Problem solving	Identify and resolve technical problems and incidents related to our website and services;
Human resources	Manage Avancie's human resources, including recruitment activities, candidate assessment and staffing.
Technical support	Provide client assistance and respond to your questions, comments and concerns;

Third parties or categories of third parties: When information is collected on behalf of a third person, Avancie informs the individual concerned of the name of the third person for whom the information is being collected. The names of the third persons or categories of third persons to whom it is necessary to communicate the information for the purposes listed above are mentioned at the time of collection and subsequently upon request:

- **Through technological means**

Generally, the technological means through which personal information is collected are among those listed and briefly described below:

Medium	Description
E-mail	Correspondence service that allows the exchange of electronic messages over the Internet (in particular <i>VotreCourriel.com</i>).
Chat	Activity by which an individual can hold a written, interactive conversation in real time with attendants or representatives of the operator of a website or service or the holder of an account for use of the service, or with a conversational agent.
Electronic form	Intangible form to be filled in on-screen, whose information is retrieved, processed, and carried on automatically, in particular by a server (e.g. <i>AForm</i>).
Online books and registers	Entity management software service centralizing data about a company or any other entity, including its shareholders, directors, officers, associates, or other related individuals (in particular <i>RegistresVirtuels.com</i>).
Software-client assistance service	Computer program that can be accessed remotely from a server and allows you to track the requests of clients and website visitors (e.g. <i>The Manager</i>).
Electronic notification	Notification sent to a recipient by a command from a software platform to make documents available, with logging of the process (e.g. <i>Todoc</i>).
Social network messaging	Instant messaging systems embedded in social networks
Authentication service	Control procedure consisting of verifying and validating the identity of a person requesting access to a network, computer system or software.
Cloud-based document storage	Online keeping and sharing of local file copies (including <i>Docurium</i>)
Electronic signatures	Functionality or IT tool for collecting electronic signatures or secure electronic signatures, as the case may be
Virtual fax	Application based on the use of the Internet and Internet protocols interoperable with traditional telephone fax machines to send or receive faxes (in particular <i>VotreFax.com</i>).
Text messages	Alphanumeric messages of limited length, which can be received or sent on a mobile terminal or computer.

- **Refusal or cessation and consequences**

If you choose to opt-out or request to stop the collection of some or all of your personal information, some features of Avancie software-as-a-service may be unusable or unavailable to you and important parts of Avancie websites may not be accessible to you, in particular areas requiring registration or authenticated login. In addition, Avancie may not be able to provide you with certain information, services or support relating to Avancie software-as-a-service.

- **Access, rectification, withdrawal and other rights**

If, as an individual with respect to personal information about you that is under the control of Avancie, you have any questions, requests or complaints regarding this or our other privacy policies or practices, please submit them in writing and forward them to our Privacy Officer in one of the following ways:

Title: ISO Coordinator and Privacy Officer

Company: AVANCIE INC.

E-mail: info.vieprivee@avancie.com

Fax: 888-829-4818

A request may relate to the exercise of any of the following rights where they exist under applicable privacy laws:

- (a) Access
- (b) Rectification
- (c) Withdrawal, erasure, oblivion
- (d) Limitation of treatment
- (e) Notification
- (f) Portability
- (g) Opposition
- (h) Information, in particular about third persons or categories of third persons to whom personal information about you has been communicated (if applicable); or
- (i) Explanation, in particular of any prediction, recommendation or decision based on an automated decision-making system that could have a significant impact on you

- **Communications to third persons**

- **Consent:** Unless otherwise provided for in applicable privacy legislation, Avancie must first obtain the valid consent of the individual concerned before communicating personal information about him or her to anyone else.

- **Statutory exceptions:** Applicable privacy legislation generally provides that a covered organization may, in certain prescribed circumstances, disclose personal information contained in a file it holds on another person without the consent of the individual concerned. As a general rule, Avancie does not disclose personal information in this way or, where circumstances warrant, without giving the individual concerned due time.
 - **Agent or provider of services:** Without the consent of the individual concerned, Avancie may communicate personal information, in particular, to any person or organization if such communication is necessary for the exercise of a mandate or the performance of a service or enterprise contract that it entrusts to such person or organization, insofar as the conditions prescribed for doing so are met.
 - **Mandatory communications:** Avancie may be required to communicate personal information it holds, in particular when the communication is requested by a person or organization having the right or power to compel communication and who requires it in the performance of his or her functions or because of an emergency situation endangering the life, health or safety of the individual concerned.
 - **Recording:** In the circumstances prescribed by applicable privacy legislation, Avancie records any communication of personal information about the individual concerned in the individual's file.
 - **Withdrawal:** If Avancie proceeds with the withdrawal of an individual's personal information, it informs, as soon as possible, any provider of services to whom it has transferred the personal information in question for outsourced dealing with and ensures that the latter proceeds with its withdrawal.
- **Communication outside Quebec**

Territories: Avancie is not likely to communicate the personal information it holds outside Quebec, except elsewhere in Canada for reasons of redundancy of its data center or elsewhere in the world (in particular Europe or the United States, as the case may be) for the outsourcing of dealings in the management of consents concerning the cookies it uses and Web audience measurement and analysis of visits to its Web sites.

Assessment: Before disclosing any personal information outside Quebec, Avancie performs a Privacy Impact Assessment (PIA), which takes into account the following factors:

- 1° the sensitivity of the information;
- 2° the purpose of its use;
- 3° any protective measures, including contractual ones, from which the intelligence may benefit;
- 4° the legal regime applicable in the State where this information would be communicated, in particular the principles of protection of personal information applicable there.

Disclosure may be made: Disclosure may be made if the assessment shows that the information would benefit from adequate protection, particularly with regard to generally recognized privacy principles. It is the object of a written agreement that takes into account the results of the assessment and, if applicable, the terms and conditions agreed to in order to mitigate the risks identified as part of such assessment. The same applies when Avancie entrusts a person or

organization outside Quebec with the task of collecting, using, communicating or keeping such information on its behalf.

- **Security measures to ensure confidentiality**

Avancie takes various measures to ensure the protection of the confidentiality of the personal information it processes, as required and taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of the processing as well as the risks. The main measures are listed below.

- **Organizational safety measures:**
 - ISO/CEI 27001 certification or equivalent
 - Training and awareness-raising for personnel
 - Authorized persons only, bound by a duty of confidentiality
 - Privacy policy
 - Subcontractor with sufficient guarantees
 - Cyber risk insurance
- **Technical safety measures**
 - System access control with complex passwords and two-factor authentication devices
 - Firewalls, intrusion detection tools and antivirus programs
 - Secure connection for telecommuters
 - Restricted removable storage devices
 - Encryption
 - File backup and recovery
- **Physical security measures**
 - Secure data centers, with access control, video surveillance and intrusion detection

Avancie regularly monitors and assesses the effectiveness of these measures and implements updates or improvements as necessary as a means of continuing to protect the confidentiality of the personal information Avancie processes on your behalf.