

# Personal Information Protection Policy

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IT Cloud Solutions (9078-3184 Quebec Inc.) ("we"). We are committed to protecting the privacy of our clients, employees and representatives ("you") and to ensuring the confidentiality of the personal information provided to us in the course of our business.

Our Personal Information Protection Policy sets out our standards for collecting, using, disclosing and storing your personal information. Our Personal Information Protection Policy also explains how we safeguard your personal information and you're right to access that information.

#### 1. Personal Information

Personal information is any information about an individual that identifies him or her.

When you register to use our services, or a representative registers on your behalf, we ask you to provide personal information. Personal information may include, but is not limited to, name, phone number, credit cards or other billing information, email address and postal addresses.

We do not treat the names of User files and folders as personal information. We therefore recommend that you do not include personal or confidential information in the names of User files or folders.

Identity theft and the practice commonly known as "phishing" are of great concern to IT Cloud Solutions. We do not and will not request your credit card information, password or SIN in a non-secure email or telephone communication.

### 2. Information Collection

Collecting information about you is necessary in order to provide you with high-quality services. The nature and sensitivity of the information we collect about you vary according to the services we provide you and the legal requirements imposed on us. Purposes for collecting information generally include providing products or services requested.

#### 2.1. **Email**

As an account holder, you may send a file to, or share a file with, recipients identified by valid email addresses that you provide. We forward or send emails and other notifications to those recipients. These email addresses and notifications may be stored for your future use and as part of transaction information we keep relating to User files. When you use client software, we may access your web-based contacts you permit us to access for the sole purpose of allowing you to select recipients to whom you wish to send or share a User file.

#### 2.2 Information Collected Automatically

When you use our services, we automatically receive and record information about this use. This information may include your IP address or ID, browser type, operating system version, language settings, pages of our website that you visited, time spent visiting the pages, information you searched for on our website, access dates, and other statistics.

We do not ask you for, access or track any location-based information from your device. If we wish to do so in the future to enhance our service, we will specifically ask your permission.

#### 2.3. Cookies

Like many websites, we use cookies or similar means to collect information. These technologies allow us to personalize and improve your experience on our website, to record your preferences, and to save your ID and password for future visits to our website.

A cookie is a small data files that we transfer to your computer's hard disk for record-keeping purposes. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting cookies from the websites that you visit. If you do not accept cookies, however, you may not be able to use all portions of our website or all the functionalities of our other services.

# 2.4. Information Collected by Third Parties

Our services include features such as links to other websites, login via Facebook, the Facebook like button, or other features hosted by third parties. These features may collect information from you and/or may set a cookie to enable the feature to function properly.

Your interaction with these features is governed by the privacy policy of the company providing them. Links and advertisements displayed on our site are not an endorsement, authorization or representation of our affiliation with that third party, nor are they an endorsement of its privacy or information security policies or practices.

# 2.5. Service Providers and Subcontractors

We may employ third-party companies and individuals to facilitate our services, to provide the service on our behalf and to perform services. The types of service providers we use include, without limitation, those that provide the following types of services: mail delivery of an external hard disk (data encryption using our software and a tracking number which enables traceability), credit card transactions, outstanding account collection, marketing, webcasting, website maintenance, live chat and IT suppliers (certified partners). Our service providers have access to your personal information only to perform these tasks, and they are obligated not to disclose or use it for any other purpose.

#### 2.6. Retention and Deletion of Your Information

User files will be stored on our systems according to the user preferences you set for the file, if any, or according to the default parameters as defined by the services and account plan you are using if no user preferences are set. Users may delete User files from our servers via the website, mobile apps or other client software they may have installed.

You may review, update or correct the personal information on your profile by logging into your account on our website and changing your user preferences.

IT Cloud Solutions delete your information 15 to 30 days following deactivation. Personal information, User file, remains in the database, however, it is placed on inactive status.

# 2.7. Information Security

IT Cloud Solutions treat the privacy and security of personal information very seriously. We employ industry-standard administrative, physical and electronic measures to safeguard personal information submitted to us from unauthorized access. We encrypt the transmission of all personal information using Secure Sockets Layer (SSL) technology and only store that information in secured data centres with restricted access. These security measures include organizational measures such as access restriction only to the extent necessary, as well as physical measures and technological measures such as passwords and encryption (changing passwords, using firewalls, etc.). Still, no method of transmission over the Internet or electronic data storage is 100% secure. Therefore, while we use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. In order to personalize our clients' data, ensure confidentiality and facilitate research and recovery when necessary, a specific user name and password has been assigned to each client.

#### 3. Consent

When we collect personal information from you, we obtain your consent to use the information for the purposes collected. You may withdraw your consent at any time, subject to legal or contractual restrictions. We will inform you of the consequences of such withdrawal, including the possibility that we may not be able to provide a product or a service. If you choose to withdraw your consent, we will record the decision in our file.

#### 4. Limits to Collection, Use and Disclosure

We limit the collection of your personal information to what we need in relation to the purposes identified to you. This means that we cannot use your personal information for other purposes without your consent, except as required by law. In certain circumstances, seeking consent may be impossible or inappropriate when you are seriously ill or otherwise incapacitated. Your personal information is only accessible to certain authorized persons,

and only to the extent necessary to perform their duties.

#### 5. Client List

We do not sell client lists to third parties.

# 6. Accuracy

We make every possible effort to ensure that your personal information is as accurate and complete as necessary for the purposes it is collected, used or disclosed.

# 7. Accountability

We adhere to legislate and self-imposed rules, aimed to safeguard your privacy. The rules are established by the Personal Information Protection Policy, industry guidelines and applicable law. All of our employees have duly signed a confidentiality agreement.

# 8. Request for Access to Information and Amendments

You have the right to be informed whether we hold personal information about you and to see that information. You also have the right to enquire as to how we collected your information, how we used it and to whom it may have been disclosed. This information will be provided to you within a reasonable time from the date we receive the written request. We may charge a reasonable fee for processing your request.

In certain specific circumstances, we may refuse to provide you the requested information. Exceptions to your access right can include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or proprietary commercial reasons, information that has been obtained in the course of an investigation of a potential breach of contract or fraud, and information that is subject to solicitor-client or litigation privilege.

You may challenge the accuracy and completeness of your personal information and, where required, request an amendment. We will respond to an amendment request within a reasonable time.

Any request for access to information or amendment must be sent to the following address:

IT Cloud Solutions 2525 Baillargeon Street, Trois-Rivieres Quebec, Canada G8Z 2V4

Or via email privacy@itcloud.ca

IT Cloud Solutions reserves the right to alter or amend this Personal Information Protection Policy at any time, without notice or liability to you or any other person. The collection, use and disclosure of your personal information will be governed by the version of the Personal Information Protection Policy that is posted and in effect at the time.