

# PRIVACY POLICY

Last Revised: 29 June 2020

This Privacy Policy (“Policy”) discloses the privacy practices for 79North. The Policy applies to our website and any associated services. The aim of this policy is to inform you of the following:

- What personal information is collected from you through the website, how it is used and with whom it may be shared
- What choices are available to you regarding the use of your personal information.
- The security procedures in place to protect the misuse of your personal information.
- How you can obtain access to the personal information about you that we hold, and request correction for any inaccuracies in that information.

## Information Collection

79North collects the following types of information:

1. personal information, which is any information about an identifiable individual, such as your first and last name, email address, phone number, address, employer, and job title, as well as any other data that may be linked to you as an identifiable individual (“**Personal Information**”). 79North collects, uses and discloses Personal Information in accordance with applicable privacy laws, and as set out in this Privacy Policy.
2. non-personal information, which is any data that is not about an identifiable individual and that cannot reasonably be linked to an identifiable individual (“**Non-Personal Information**”). Non-Personal Information may include aggregated level data, such as demographic information grouped by postal code, as well as information relating to corporations, rather than individuals. In addition, Non-Personal Information can include Personal Information that has been reliably “de-identified” through the removal or modification of personally identifiable data elements, or the extraction of non-personally identifiable elements such that the resulting data may not be re-associated with an identifiable individual. Under applicable privacy law, Non-Personal Information may be collected, used and disclosed without restriction.

We collect your Personal Information in the following ways:

- We may collect content that you submit to this website, which may include social media identities or email addresses. For example, you provide content to us when you provide feedback or request information.
- We may collect Personal Information that you otherwise provide to us in the course of other direct contact with you, such as through electronic mail or other messages that you may send us through the site

- We may also automatically collect certain information about you when you access or use the Website (“Usage Information”). Usage Information may include data elements such as IP address, device identifier, browser type, operating system and information about your use of the Service.

## **Information Use**

We collect and use your Personal Information for the following purposes:

- To allow you to use the Website and its features.
- To facilitate, manage, personalize, and improve your online experience.
- To improve the Service and our business operations by better understanding user needs and behavior.
- To fulfill other purposes that may be disclosed at the time you provide Personal Information.
- To prevent and address fraud, breach of policies or terms; threats or harm and other illegal or prohibited activity.
- As required or permitted by law.
- To communicate with you about your feedback or information request.
- To communicate with you:
  - with your consent, or as otherwise permitted by law, for marketing or promotional purposes
  - for research purposes

Communication may be via emails, device notifications, or other methods, consistent with any permissions you may have communicated to us.

- We also collect Usage Information in order to better understand how the Website is used and to respect your preferences.

Note that under most applicable Canadian privacy laws, information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession such as the individual’s name, position name or title, work address, work telephone number, work fax number or work electronic address, may be collected, used or disclosed, without consent, solely for the purpose of communicating or facilitating communication with the individual in relation to their employment, business or profession.

## **Information Sharing**

We will use your Personal Information only for 79North’s own purposes, as disclosed in this Privacy Policy. We will not sell or rent this information to anyone for their own purposes.

We may, from time to time, share your Personal Information with third party service providers that we engage to provide services on our behalf, such as information technology support services. We will limit any such disclosure to only the Personal Information that is reasonably

necessary for the purpose or service for which the service provider is engaged. We will use contractual and other means to provide a comparable level of protection while the information is being processed by these service providers, including limiting such providers to using your Personal Information solely to provide 79North with the specific service for which they were engaged, and for no other purpose.

In addition, we may share your Personal Information where reasonably required in connection with or during negotiations of any proposed or actual financing of our business, or merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of our shares or assets, or transfer of all or a portion of our business to another company, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. In any such case, the recipient parties will be contractually required to keep the information confidential and use it only for the purposes of the transaction, or proposed transaction, in question. In the event a business transaction is completed, assignees or successors of 79North or our business or assets may use and disclose Personal Information only for the purposes as set out this Privacy Policy, unless further consent is obtained.

### **Disclosure to Law Enforcement**

As required or permitted by law, we may disclose information to law enforcement agencies without further consent or notification upon a lawful request from such agencies. We will cooperate fully with law enforcement agencies.

We may also share your Personal Information, as necessary, in order to enforce our terms of use or privacy policy, or to protect the rights, property, life, health, security and safety of 79North, the users of the Website, or any third party.

### **Your Access to and Control Over Information**

In accordance with applicable privacy laws, we have implemented additional transparency on how you have access and control over your information. Subject to the requirements and restrictions under applicable privacy laws in your jurisdiction, you may be afforded the following rights:

**Right of Access** - the right to be informed of and request access to the Personal Information we process about you;

**Right to Rectification** - the right to request that we amend or update your Personal Information where it is inaccurate or incomplete;

**Right to Deletion** - the right to request that we delete your Personal Information;

**Right to Restrict** - the right to request that we temporarily or permanently stop processing all or some of your Personal Information;

**Right to Object** –

- the right, at any time, to object to us processing your Personal Information on grounds relating to your particular situation;
- the right to object to your Personal Information being processed for direct marketing purposes;

**Right to Data Portability** - the right to request a copy of your Personal Information in electronic

format and the right to transmit that Personal Information for use in another party's service;  
**Right not to be subject to Automated Decision-making** - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

In order to enable you to exercise these rights with ease you may contact us at any time to make changes to the information we maintain.

If you would like to review, correct, or update information that you have previously provided to us, you can contact us at [info@79north.ca](mailto:info@79north.ca). For your protection, we only fulfill requests for the information associated with the email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable.

### **Data Retention and Deletion**

We keep your Personal Information only for so long as is reasonably necessary to fulfill legitimate and essential business purposes, such as contractual requirements resolving dispute and as otherwise required or permitted by law. Except as may be required or permitted by law, upon request, we will delete or anonymize your Personal Information so that it no longer identifies you or required to maintain certain Personal Information, including situations such as the following:

**Personal Information may be accessed from or stored or processed outside of your country of residence, where it will be subject to the laws of the jurisdiction in which it is stored or processed, or from which it is accessed. These laws may be different from those of your country of residence.**

### **Links**

This web site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

### **Security**

We take reasonable measures to protect Personal Information from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction by implementing appropriate technical, physical and organizational security safeguards. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/servers in which we store personally, identifiable information are kept in a secure environment.

When you submit your Personal Information via the Website, your information is protected both online and offline. Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the address of the web page.

However, note that transmission via the Internet and online digital storage are not completely secure and 79North does not guarantee the security of your information collected through the Website.

## **Cookies**

We may use "cookies" on this site. A cookie is a text file stored on a site visitor's device. Cookies may be session ID cookies or tracking cookies. Session cookies make it easier for you to navigate the Website and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Website and enhance your user experience. Cookies may remain on your device for an extended period. If you use your browser's method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked and as a result some features, and functionalities of the Website may not work.

We use cookies to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site.

## **Changes**

Any changes to our Privacy Policy will be placed here and will supersede this version of our Policy. We will take reasonable steps to draw your attention to any changes in our Policy. However, we suggest that you read this document each time you use the website to ensure that it still meets with your approval. The date of the last revision, at the top of the policy, will help you readily determine if there have been any updates since your last visit.

## **Contact Us**

If you feel that we are not abiding by this privacy policy, you should contact us immediately via email at [info@79north.ca](mailto:info@79north.ca). You may also contact us with any questions that you might have about this policy or our practices with respect to the handling of your Personal Information.

79North is the data controller for the purposes of the Personal Information processed under this policy.