

# PlanMyLeave Privacy Policy

PlanMyLeave is committed to maintaining the privacy of individuals and protecting personal information in its custody or control in accordance with privacy legislation.

## Application

This Policy describes and summarizes the practices of PlanMyLeave and its affiliates with respect to our collection, use and/or disclosure of personal information related to all individuals other than employees and individual contractors of PlanMyLeave ; those individuals are subject to a separate policy.

## In this Policy, the following terms have the meanings below:

Personal information means information about an identifiable individual, which does not include information of an aggregate or anonymous nature where a specific individual or individuals cannot be identified. Personal Information also does not include business contact information, as long as business contact information is used to contact an individual in their capacity as an employee or official of an organization, and for no other purpose. Information about a corporation, firm, trust, union or other non-individual entity is not personal information.

Business contact information means an individual's name and position or title as an official or employee of an organization, as well as their business telephone number, business address, business e-mail, business fax number and other business contact information.

## Privacy and our Website

We do not collect any personal information from individuals who simply visit our website. However, individuals should be aware that most web servers do collect some information about visitors, such as the browser and version being used, the operating system, and the "IP" or internet address of the visitor, which may identify the individual's Internet Service Provider or computer but not necessarily the individual using it.

PlanMyLeave's website server also uses cookies, which are small text files containing information sent to the computer of a visitor to our website. Cookies are used to help our web server track such things as user preferences that the user may submit in order to make the website more interactive with the user and more responsive to their preferences. Information stored in cookies is used to pre-populate form fields and to remember user preference. This is done for user convenience. The tracking process is anonymous and no personal information is used.

## **E-mail**

If you voluntarily submit personal information to us by e-mail for purposes of obtaining information, we will consider that you have done so with your consent for purposes reasonably related to your providing the information. If reasonable to do so, after our initial response, we may send further information to you with information that may be useful, but we will include instructions on how to terminate receiving such further information. Please be advised that the Internet and e-mail are inherently insecure media, and we cannot take responsibility for the security or privacy of personal information in transit over the Internet.

## **Third Party Websites**

Please note that our website may contain links to other websites which are provided as a convenience for visitors to our website only. Any third party websites will have their own privacy policies and practices, and we cannot be responsible for such third parties, their websites, or their privacy practices.

## **Sources of Personal Information**

PlanMyLeave generally collects, uses and discloses personal information about the following types of individuals:

- \* Customers, employees of and contractors to customers;
- \* Prospective or potential customers or their employees;
- \* Subscribers to PlanMyLeave newsletters, white papers or similar types of information;
- \* Employees and independent contractors (where such contractors are individuals) of PlanMyLeave for the purposes of establishing, managing and terminating employment and contractor relationships;
- \* Other individuals who may voluntarily choose to provide PlanMyLeave with personal information.

There are a number of exceptions to the above provisions in that in some circumstances, such as with certain personal information related to employees, PlanMyLeave does not require consent to collect, use or disclose personal information but is required to provide notification in advance.

In other circumstances, specifically those set out in applicable legislation, the law does not require that PlanMyLeave obtain consent or provide notification. PlanMyLeave reserves all its rights to rely on any available statutory exemptions and exceptions.

## **Exceptions to the requirement for consent**

PlanMyLeave may collect personal information without consent in circumstances that include but are not limited to the following:

Where a reasonable person would consider that the collection of the information is clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;

Where the collection of the information is from a public body where the information is publicly available;

In addition to the above, the law generally provides that an individual is deemed to consent to the collection, use or disclosure of personal information about that individual for a particular purpose if the individual voluntarily provides the information for that purpose, and it is reasonable that a person would voluntarily provide that information. If an individual provides personal information to us voluntarily, we will rely on deemed consent and consider that the individual consents to our collection, use or disclosure of their personal information as necessary to carry out the purposes for which they provided the information.

### **Why we collect, use and disclose personal information**

PlanMyLeave generally collects; uses and discloses personal information for the following purposes:

- \* Customers, employees of and contractors to customers: To establish, maintain, manage and terminate a relationship with a customer.
- \* Prospective or potential customers or their employees: To attempt to establish a relationship with a customer.
- \* Subscribers to PlanMyLeave newsletters, white papers or similar types of information: To provide services, information or documentation and to solicit business.
- \* Suppliers (including non-individual contractors to PlanMyLeave), employees of and contractors to suppliers: To establish, maintain, manage and terminate a supplier relationship.
- \* Individuals who may voluntarily choose to provide PlanMyLeave with personal information: To fulfill the purposes for which such information was provided.
- \* PlanMyLeave employees and individual contractors: To recruit, establish, maintain, manage and terminate an employment or individual contractor relationship.

### **Computer Interaction**

There are occasions where PlanMyLeave representatives may remotely access a computer of a PlanMyLeave customer in order to provide services, including technical support or product support. Such access may include an exchange of information of a conversational nature and, while not intended to do so, such access may result in the collection of personal information incidental to our providing services. The activities carried out during such access are recorded and archived so that the recording of such activities may later be viewed or reviewed for the purposes of providing services to the customer in question. The recording is a video file without sound and is subsequently used only for the purposes of assisting the customer. In all cases where a computer

becomes subject to access by PlanMyLeave, such access will be with the customer's knowledge and consent.

## **Security**

We recognize our legal obligations to protect the personal information we have gathered about individuals. We have therefore made arrangements to secure against unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. These arrangements may include physical security measures, network security measures, and organizational measures such as non-disclosure agreements and need-to-know access.