



## KiSP, Inc. Privacy Policy

This Privacy Policy was last updated on October 2nd, 2012.

### Introduction

This Privacy Policy sets out the privacy policies and practices of KiSP, Inc. (referred to as “**KiSP**”, “**our**”, “**us**” or “**we**”) with respect to the collection, use, and disclosure of personal information in connection with The KITS *collaborator*<sup>TM</sup> service, including The KITS *collaborator*<sup>TM</sup> - Mobile Edition, and www.kisp.com (the “**Services**”).

In this Privacy Policy, “personal information” means information about an identifiable individual, as further defined under applicable Canadian laws, and “including” and its derivatives means “including without limitation”.

### Changes to this Privacy Policy

We reserve the right to make changes to this Privacy Policy. The changes will be effective on the earlier of: (i) us providing you with notice of the changes (including by email, by posting notice on the Services, or by other reasonable means), or (ii) 14 days after the updated Privacy Policy has been posted on the Services. However, changes made to comply with the law will be effective immediately. You agree to regularly review this Privacy Policy to be aware of any changes.

### Collection and Use of Information

We collect information in a number of ways:

- a. **Information you provide.** This includes information you voluntarily provide when you register for the Services, update your account information, or use the Services. For example, your name and contact information.
- b. **Information from your use of the Services.** This includes information collected in our server logs (such as browser type, pages visited, referring page, IP address, date and time stamps, other statistics, and errors), through Cookies (such as saving your login information and storing session information), and about the device you are using to access the Services (such as hardware and operating system details).

Not all information we collect identifies you or can be attributed as being identifiably about you when taken on its own. Similarly, we may aggregate your information with other information (including aggregating information about your use of the Services with that of others) in a way that it isn’t attributable as being identifiably about you (including by aggregating it into groups or categories). This Privacy Policy does not apply to restrict our collection, use or disclosure of such anonymous or aggregated information. However,



this same information may be considered personal information if we combine it with other information (such as identifiers like your name or address) in a way that makes it attributable as being identifiable about you. This Privacy Policy will apply to your information when it is combined in this identifiable way.

**We use your personal information:**

- a. To provide the Services to you. This includes processing your registration and maintaining your account, tailoring or customizing the Services to you, providing you with analytics and tips regarding your use of the Services.
- b. To maintain and improve user experiences and overall quality of the Services, and to develop new services. This includes diagnosing problems with our systems, administering the Services, and analyzing how the Services are being used.
- c. To create anonymous aggregated information.
- d. For additional purposes that may be identified at or before the time that the information is collected, or that you subsequently consent to.

We may store or process your personal information on servers in jurisdictions outside of Canada. While your personal information is in a jurisdiction it may be accessed by the courts, law enforcement and national security authorities of that jurisdiction in accordance with the laws applicable in that jurisdiction.

**Disclosure of Information**

We may disclose personal information:

- a. To third party service providers and to affiliated entities in order to carry out work on our behalf.
- b. If you choose to share personal information publicly, with other users of the Services, or with other sites (such as social media sites), we may facilitate this sharing. We do not control these third parties that you might choose to share your personal information with or how they use your personal information, and we are not responsible for their privacy practices. You should review the privacy policies of any third party before you decide to share your personal information with them and always exercise caution when publicly sharing your personal information.
- c. To a third party where you express interest in, or choose to purchase or participate in, a promotion, program, activity, service, or product offered by the third party.



- d. As required or permitted by law, and to law enforcement agencies and private parties for the purposes of investigating fraud or other offences.
- e. To legal, financial, insurance, and other advisors or in connection with the sale, reorganization, or management of all or part of its business or operations.
- f. As consented to by you from time to time, including to fulfill any other purposes that are identified when the personal information is collected.

### **Consent**

Your consent may be express or implied, and given in writing by using or not using a check-off box, electronically, orally, or by your conduct, such as use of the Services.

### **Links**

The Services may contain links to other sites. We are not responsible for the privacy practices or the content of such sites. You should review the privacy policies of the sites that you visit. This Privacy Policy applies solely to information collected by KiSP in connection with the Services.

### **Security**

We protect against the loss, misuse, and alteration of personal information with security measures appropriate to the sensitivity of the information, including through the use of physical, organizational, and technological measures and appropriate training of employees. However, it is possible that any information transmitted via the Internet may be intercepted by unknown third parties.

### **Opt-Out**

When appropriate, you are given the opportunity to (i) opt-out of receiving communications from us, or (ii) remove your personal information from our records. If you wish to opt-out of receiving further communications, please contact us by email or phone using the contact information provided below.

### **Corrections/Contact**

You may contact us to modify or correct any of your personal information that is under our control. You may also direct a written complaint regarding compliance with this Privacy Policy to us and, within a reasonable time upon receiving the written complaint, we will conduct an investigation into the matter. Within a reasonable time of concluding the investigation, we will inform you whether the complaint will be allowed or denied. If allowed, we will take appropriate measures necessary to rectify the source of the complaint.



## **Contact**

If you have any questions about this Privacy Policy, or our collection, use, or disclosure of your personal information in connection with the Services, please contact us as follows:

KiSP, Inc.

Attention: Nidia Cabral

Address: 151 Placer Court, Toronto, Ontario, Canada, M2H 3H9.