



Privacy Policy (Quebec Law 25 Compliant)

This document assists ClickControl Inc. in maintaining its privacy policy. It provides guidelines for collecting, storing and destroying personal data according to required retention periods.

Table of Contents

| | |
|--|---|
| Record of Changes | 3 |
| Review Cycle | 3 |
| Overview | 4 |
| Purpose | 4 |
| What Information We Collect | 4 |
| How We Collect Information | 4 |
| How We Use the Information (Use of Information) | 5 |
| How We Share the Information (Information Sharing) | 5 |
| How We Store the Information (Data Security) | 6 |
| Data Lifecycle/Retention | 6 |
| Personal Rights – Law 25 | 6 |
| Privacy Impact Assessment | 6 |
| Designated Privacy Officer | 7 |

Record of Changes

| Ver. # | Implemented by | Revision Date | Approved by | Approval Date |
|--------|----------------|---------------|-----------------|---------------|
| 1.0 | Reza Babaei | 09/09/2023 | Behrad Shirvani | 09/12/2023 |
| 1.1 | Reza Babaei | 09/08/2024 | Behrad Shirvani | 09/10/2024 |
| | | | | |
| | | | | |

Review Cycle

This Privacy Policy should be reviewed on an annual basis. The review should verify the information within and remove any references or individuals that are not relevant to ClickControl business. All changes to this policy must be reviewed and approved by Behrad Shirvani, the ClickControl President.

Overview

A Privacy Policy prepares an organization for the legal and business requirements of managing personal information records by defining the retention period, archival process, destruction process and special handling for litigation purposes.

Effective security is a team effort involving the participation and support of every ClickControl employee and affiliate who deals with information and/or information systems. It is the responsibility of every employee to know these guidelines, and to conduct their activities accordingly.

Purpose

This Privacy Policy is intended to help employees determine what information records should be collected and retained, the retention period of those information records and when the information records can be destroyed.

The purpose of a privacy policy is to inform individuals about how their personal data is collected, used, stored, and shared by an organization. It serves several key functions. In essence, a privacy policy builds trust by ensuring that users are aware of and understand the organization's data practices.

Questions about these guidelines should be addressed to privacy officer, Reza Babaei.

What Information We Collect

We collect the following categories of personal information to provide and improve our services:

- **Identification Information:** Name, email address, phone number, mailing address.
- **Technical Information:** IP address, device information, browser type, usage data such as pages visited, and actions taken on our website.
- **Financial Information:** Payment details if relevant to processing orders or services.
- **Demographic Information:** Age, location, nationality, or other personal attributes.
- **Sensitive Information:** Only collected with your explicit consent, including health or biometric data, where applicable.

How We Collect Information

We collect personal information using various technologies, including:

- **Website and Online Forms:** When you sign up for services, complete forms, or contact us.
- **Cookies and Tracking Tools:** To analyze website usage and enhance your user experience (profiling is done only with explicit consent).

- **Third-Party Services:** Through integrations with third-party platforms for support, analytics, and processing.

We collect only the information that is necessary for the purposes identified in this policy and ensure that all data collection is in compliance with **data minimization** principles.

How We Use the Information

We may use your personal information for the following purposes:

- Providing, maintaining, and improving our services.
- Processing transactions, managing orders, and delivering products.
- Personalizing your experience by offering content and services relevant to your preferences.
- Handling customer support inquiries, processing refunds, and responding to complaints.
- Complying with legal obligations and maintaining security.

We will not use your information for purposes other than those explicitly stated without your **explicit consent**.

How We Share the Information

We may share your personal information with trusted third parties, including:

- **Service Providers:** For processing payments, delivering products, managing customer support, and other operational needs.
- **Affiliates and Business Partners:** In cases where services are co-provided, or collaboration is required.
- **Legal Authorities:** When required by law or in the protection of legal rights.

If your personal information is transferred outside of Quebec, we will ensure that the recipient provides an **equivalent level of protection** as required by Quebec's privacy laws, and you will be informed of the jurisdiction in which the data is processed.

What Information We Collect

We collect the following categories of personal information to provide and improve our services:

- **Identification Information:** Name, email address, phone number, mailing address.
- **Technical Information:** IP address, device information, browser type, usage data such as pages visited, and actions taken on our website.
- **Financial Information:** Payment details if relevant to processing orders or services.
- **Demographic Information:** Age, location, nationality, or other personal attributes.
- **Sensitive Information:** Only collected with your explicit consent, including health or biometric data, where applicable.

How We Store the Information

ClickControl Inc. takes robust measures to ensure the security of your personal information. We implement:

- **Physical Security:** Restricted access to company facilities and secure cloud/on-prem storage.
- **Technical Security:** Firewalls, encryption, and secure authentication protocols.
- **Administrative Security:** Internal policies and regular employee training on data protection.

Data Lifecycle/Retention

We Store personal information only for as long as necessary to fulfill legal, contractual, or operational obligations. We won't keep personal data 5 years after closing the projects or contracts. Finally, in the **disposal** stage, the data is permanently deleted or anonymized when no longer required, following secure data destruction protocols to prevent any potential misuse. This lifecycle ensures that personal data is handled responsibly and in compliance with company privacy regulations.

Personal Rights – Law 25

In accordance with Quebec's **Law 25**, you have the right to:

- **Access:** Review the personal information we hold about you.
- **Rectification:** Correct or update your personal data if it is inaccurate or incomplete.
- **Deletion:** Request the removal of your personal information, subject to legal and operational constraints.
- **Objection:** Object to the use of your data for certain purposes, such as marketing or profiling.
- **Data Portability:** Request a copy of your data in a structured, commonly used format.
- **Breach Notification:** You will be informed of any data breach that poses a risk of serious harm to your privacy.

To exercise these rights, please contact our Privacy Officer. The appropriate email address is privacy@clickcontrol.com.

Privacy Impact Assessment

For any new services or technologies that involve the collection or processing of personal information, ClickControl Inc. will perform **Privacy Impact Assessments (PIA)** to ensure compliance with Law 25 and mitigate privacy risks.

Designated Privacy Officer

In compliance with Law 25, we have appointed a **Privacy Officer** responsible for overseeing the protection of personal information and compliance with this policy. You may contact our Privacy Officer at:

Privacy Officer

ClickControl Inc.

Reza Babaei

privacy@clickcontrol.com