

## QUEBEC PRIVACY POLICY

*Last Updated: August 23<sup>rd</sup> 2023*

**PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE SITE.**

### INTRODUCTION

CTSpec is committed to protecting the privacy and security of your personal information. We also believe in transparency. This Policy explains how we treat your personal data. Please read this Policy carefully to learn more about how we process personal information and what rights you may have under applicable law.

**When does this Policy apply?** This Policy describes our practices for the personal information for which we are a “data controller” under applicable law. This includes information collected when you visit our website, <https://www.appvoila.com/> (the “Site”). This Policy does not apply, however, when we process personal data on behalf of a customer. For information about a customer’s data practices, please contact the customer directly. We are not responsible for our customers’ privacy or security practices.

### HOW DO WE COLLECT AND USE PERSONAL INFORMATION?

We collect the following types of personal data for the purposes listed below. You may choose not to provide us with any personal information, but you will not be able to access portions of the Site that require personal information.

<b>Category</b>	<b>Description and Purpose</b>
Contact Information	<p>If you contact us or submit a question via our Site, request a demo, or otherwise inquire about our products or services, we collect your name, company name, work email address, and phone number.</p> <p>We process Contact Information to provide our products and services to you, to provide customer support, to ensure the privacy and security of our Site, products, and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Site and business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
Account Registration Information	<p>When you purchase or register for our services, we collect your Contact Information, your company website URL, and a record of the products and services purchased.</p> <p>We process Account Registration Information to provide our products and services to you, to provide customer support, to ensure the privacy and security of our products and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Site and</p>

	<p>business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
<p>Payment Information</p>	<p>When you purchase products or services from us, our third-party payment processor will collect your credit card number, security code, and expiration date. We only receive confirmation of your payment once it goes through, and such confirmation is then linked to your transactions and other personal information.</p> <p>We process Payment Information to operate our business, to provide our products and services to you, to manage our relationships with you, and to detect fraud, illegal activities, or security breaches. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Site and business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
<p>Communications and Inquiries</p>	<p>If you contact us, in addition to your Contact Information, we will receive the subject matter of your message and any comments, content, or other information that you choose to provide.</p> <p>We process Communications and Inquiries to provide our products and services to you, to provide customer support, to ensure the privacy and security of our Site, products, and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Site and business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
<p>Job Application Information</p>	<p>If you apply for a job position through our Site, we collect [your first and last name, email address, phone number, address, resume including education and professional history, and any other information you choose to provide, including gender or certain race, ethnicity, veteran, or disability status.]</p> <p>We process Job Application Information in order to [***].</p>
<p>Cookies and Similar Technologies</p>	<p>We use cookies and use similar technologies as described in the “<i>Cookies and Similar Technologies</i>” section of this Policy. If you choose to disable cookies and similar technologies, some areas and features of the Site may not work properly.</p> <p>We process Cookies and Similar Technologies to operate the Site, to serve you the content and functionality you request, to ensure the privacy and security of our Site, to develop new services, to enhance your experience and provide you with a more personal and interactive experience, and for usage analytics purposes. Where required by law, we rely on your express opt-in consent for the use of marketing, performance, and analytic cookies and similar technologies. The legal basis for processing of strictly necessary cookies is our legitimate interests in the proper administration of our Site and business.</p>
<p>Device and Usage Information</p>	<p>When you visit the Site, we automatically collect information from your browser and your device, which includes the date and time of your visit as well as your</p>

	<p>location, Internet Protocol (IP) address or unique device identifier, domain server, browser type, access time, and data about which pages you visit.</p> <p>We process Device and Usage Information to operate the Site, to serve you the content and functionality you request, to ensure the privacy and security of our Site, to develop new services, to enhance your experience and provide you with a more personal and interactive experience, and for usage analytics purposes. The legal basis for this processing is our legitimate interests in monitoring and improving our Site.</p>
--	---

**Other Processing Activities.** We may also process personal information when necessary for the following:

- The establishment, exercise, or defense of legal claims, whether in court, administrative, or other proceedings. (The legal basis for this processing is our legitimate interest in the protection and assertion of our legal rights, your legal rights, and the legal rights of others.)
- Obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice (The legal basis for this processing is our legitimate interest in the proper protection of our business.)
- Purposes that are consistent with, related to and/or ancillary to the purposes and uses described in this Policy for which your personal information was provided to us.

We may process your personal information in connection with any of the purposes and uses described in this Policy on one or more of the following legal grounds:

- Because it is necessary to perform the services you have requested or to comply with your instructions or other contractual obligations between you and us;
- To comply with our legal obligations as well as to keep records of our compliance processes;
- Because our legitimate interests, or those of a third-party recipient of your personal information, make the processing necessary, provided those interests are not overridden by your interests or fundamental rights and freedoms;
- Because you have chosen to publish or display your personal information on a public area of the Site, such as a comment area;
- Because it is necessary to protect your vital interests;
- Because it is necessary in the public interest; or
- Because you have expressly given us your consent to process your personal information in a particular manner.

We do not use personal information for making any automated decisions affecting or creating profiles other than as described herein.

**Location of Processing.** We have operations in Quebec, and personal information is transferred to, stored, and processed in Quebec, as well as other provinces in which we or our, affiliates, partners, service providers, or agents maintain facilities. By sending us personal information or using the Site, you agree and consent to the processing of your personal information in locations such as the United States, which may not offer the levels of protection required in other countries. We rely on recognized legal bases to lawfully conduct cross-border/international transfers of personal information, such as express consent, when transfer is necessary for us to deliver services pursuant to an agreement, or when the transfer is subject to safeguards that assure the protection of the personal information.

For more information about Cookies, please consult our Cookies Policy.

## COOKIES AND SIMILAR TECHNOLOGIES

**First and Third-Party Cookies.** A “cookie” is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a “session” cookie) or a future browsing session (a “persistent” or “permanent” cookie). “Session” cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session. “Persistent” or “permanent” cookies remain stored on your hard drive until they expire or are deleted by you. Local shared objects (or “flash” cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you’re visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website.

**Other Similar Technologies.** In addition to cookies, there are other automatic data collection technologies, such as Internet tags, web beacons (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as users navigate through and interact with a website. For example, web beacons are tiny graphics with unique identifiers that are used to understand browsing activity. In addition, UTM codes are strings that can appear in a URL when you move from one web page or website to another. The string can represent information about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

### **What Cookies and Similar Technologies Are in Use and Why Do We Use Them?**

**Other Third-Party Technologies.** Some third parties may use automated data collection technologies to collect information about you when you browse the Internet. We do not control these third parties’ technologies or how they may be used. If you have any questions about targeted content, you should contact the responsible party directly or consult their privacy policies.

**Choices About Cookies.** Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website technologies. These settings may affect your enjoyment of the full functionality of the Site. In addition, adjusting the cookie settings may not fully delete all of the cookies that have already been created. To delete them, visit your web browser settings after you have changed your cookie settings. Additional information is provided below about how to disable cookies or manage the cookie settings for some of the leading web browsers:

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac> and <https://support.apple.com/en-us/HT201265>

To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website at: <https://www.macromedia.com/support/documentation/en/flashplayer/help/help09.html>. For more information about how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/>. You may learn more about internet advertising practices and related consumer resources at <http://www.aboutads.info/consumers/>, <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>, or <http://www.networkadvertising.org/choices>.

## HOW DO WE SHARE YOUR PERSONAL INFORMATION?

When we are acting as the data controller or where permitted by applicable law, we may share your personal information in the following contexts.

<b>Category</b>	<b>Disclosure Contexts</b>
Corporate Affiliates	We share personal information with our corporate subsidiaries and affiliates and with their respective officers, directors, employees, accountants, attorneys and agents.
Acquisitions and Similar Transactions	We may disclose your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred
Disclosures with Your Consent	We may ask if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Policy. We will only disclose your personal information in this context with your consent.
Legal Obligations and Rights	We disclose personal information in response to subpoenas, warrants, court orders or other legal process, or to comply with relevant laws. We may also share personal information in order to establish or exercise our legal rights, to defend against a legal claim, and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of contract. We may also disclose personal information as needed to protect vital interests.
Service Providers	We share personal information with our agents, contractors and service providers. Among other things, service providers help us to administer the Site; support our provision of products and services; send marketing communications; provide technical support; and assist with other legitimate purposes permitted by law.
Professional Advisors	We share personal information with our insurers and other professional advisors, including attorneys, accountants, consultants, and auditors, that need access to your information to provide operational or other support services on our behalf.
Deidentified or Aggregated Data	We share aggregated information and information that does not identify any specific individual, such as groupings of demographic data and customer preferences, (i) for compliance with reporting obligations; (ii) for business or marketing purposes; and (iii) to assist us and others in understanding our users' interests, habits, and usage patterns for certain programs, content, services, marketing, and/or functionality.

## HOW LONG DO WE PROCESS YOUR INFORMATION?

We retain and use your personal information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, and (3) if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives.

To the extent permitted by law, we may retain and use anonymous, de-identified, and aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement. When we delete data, it will be removed from our active servers and databases; but, it may remain in our archives when it is not practical or possible to delete it.

## HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have put security measures in place to protect personal information from being accidentally lost, used, altered, or disclosed or accessed in an unauthorized manner and to detect fraudulent identify-verification activity, including when transmitting personal information in response to data subject requests. From time to time, we review our security procedures to consider appropriate new technologies and methods.

However, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect personal data, we cannot guarantee or warrant the security of any information transmitted to or from the Site or services. Your use of the Site is at your own risk. We cannot guarantee that your data will remain secure in all circumstances.

If a data breach compromises your personal information, we will notify you and any applicable regulator when we are required to do so by applicable law.

## YOUR RIGHTS AND CHOICES

Please use the “Contact Us” details at the end of this Policy to exercise your rights and choices under this Policy.

**Email Preferences.** If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link at the bottom of our emails or by contacting us via the “Contact Us” details at the end of this Policy and providing your name and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take corrective action. Please note that registered users cannot opt out of receiving transactional e-mails related to their account.

**Accuracy and Updating Your Personal Information.** Our goal is to keep your personal information accurate, current, and complete. If any of the personal information you have provided to us changes, please update it in your user/account profile, or let us know via the “Contact Us” details at the end of this Policy. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

**Complaints.** If you believe that your rights relating to your personal information have been violated, you may lodge a complaint with us by contacting us via the “Contact Us” details at the end of this Policy.

**Individual Rights.** You may have certain rights relating to your personal data under local data protection laws, and we discuss the rights provided in various jurisdictions below. We honor individuals’ rights where required under applicable law, and, depending on the applicable laws, these rights may include the right to:

- Access your personal information;
- Know more about how we process your personal information;
- Rectify inaccurate personal information and, taking into account the purpose of processing the personal information, ensure it is complete;
- Erase or delete your personal information;
- Restrict our processing of your personal information;
- Transfer your personal information to another controller, to the extent possible;

- Object to certain processing of your personal information;
- Opt-out of certain disclosures of your personal information to third parties;
- If you're under the age of 16, or such other applicable age of consent, opt-in to certain disclosures of your personal information to third parties;
- Not be discriminated against for exercising your rights described above;
- Not be subject to a decision based solely on automated processing, including profiling, which produces legal effects; and
- Withdraw your consent at any time (to the extent we base processing on consent), without affecting the lawfulness of the processing based on such consent before its withdrawal.

All requests should be sent to the contact details noted in the "Contact Us" section of this Policy. Your personal information may be processed in responding to these rights. If you are exercising a right that is the responsibility of a third party, including one of our customers, we will direct you to contact the appropriate data controller who is responsible for responding to your request.

**HOW DO WE USE YOUR PERSONAL INFORMATION?** The disclosures below describe our data practices: Personal Information Collected: We have collected the categories of personal information listed below:

- Identifiers
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data
- Audio, Electronic, Visual, or Similar Information
- Professional or Employment-related Information
- Categories of Sources: We have collected the personal information identified in this Policy from you and from other third-party sources, including data partners.
- Business and Commercial Purposes for Collecting: We have collected the categories of personal information listed above for the following purposes:
  - To provide our products and services to you
  - To provide customer support
  - To ensure the privacy and security of our Site, products, and services
  - To maintain our databases and back-ups
  - To manage our relationships with you
  - To communicate with you
  - To keep records of our communications with you
  - To operate our business
  - To detect fraud, illegal activities, or security breaches
  - To operate the Site,
  - To serve you the content and functionality you request
  - To develop new services
  - To enhance your experience and provide you with a more personal and interactive experience
  - Usage analytics purposes
- Personal Information Sold: We have not sold categories of personal information
- Personal Information Disclosed for a Business Purpose. We have disclosed for a business purpose the categories of personal information listed below. We have disclosed each category of personal information to the following categories of third parties: (1) corporate parents, subsidiaries, and affiliates; (2) advisors (accountants, attorneys); (3) service providers (data analytics, data storage, mailing, marketing, website and platform administration, technical support); and (4) operating systems and platforms.
  - Identifiers

- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data
- Audio, Electronic, Visual, or Similar Information
- Professional or Employment-related Information

**No Financial Incentive.** We do not offer financial incentives or any price or service difference in exchange for the retention or sale of your personal information.

### THIRD-PARTY SITES AND SERVICES

This Policy does not apply to any third-party websites or applications. The Site may contain links to, and media or other content from, third parties. These links are to external resources and third parties that have their own privacy policies. Because of the dynamic media capabilities of the Site, it may not be clear which links are to external, third-party resources. If you click on a third-party link, you will be redirected away from the Site. You can check the URL to confirm whether you have left the Site.

We cannot and do not (1) guarantee the adequacy of the privacy or security practices employed by or the content and media provided by any third parties or their websites, (2) control third parties' independent collection or use of your information, or (3) endorse any third-party information, products, services or websites that may be reached through embedded links on the Site.

Any information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms of use.

### CHILDREN

Our Site, products, and services are not directed to children under the age of 14, nor is information knowingly collected from children under the age of 14. No one under the age of 14 may access, browse, or use the Site or provide any information to us. If we learn that we have collected or received personal information from a child under the age of 14 without a parent's or legal guardian's consent, we will take steps to stop collecting that information and delete it. If you believe we have any received information from a child under the age of 14, please contact us using the "Contact Us" details provided below.

### UPDATES AND CHANGES TO THIS POLICY

We may add to, change, update, or modify this Policy from time to time. We will post all changes to this Policy on this page, and the updated policy will be effective immediately upon posting. If we make material changes, we will also notify you through a notice on the homepage of the Site for a reasonable period of time. We may also, in our discretion, notify you of changes to this Policy via email.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, and from time to time, so that you are aware of its current terms. Your continued use of the Site after the "Last Updated" date will constitute your acceptance of and agreement to any changes and to our collection and sharing of your information according to the then-current Policy. If you do not agree with this Policy and our practices, you should not use the Site.



## CONTACT US

If you have any questions or concerns, wish to exercise your rights, or want to submit a complaint, please contact us using the information below, and we will do our best to assist you.

**Kaylana Marchionni, Quebec Privacy Officer**

**By email: [canadianprivacyofficer@harriscomputer.com](mailto:canadianprivacyofficer@harriscomputer.com)**

**By phone: (647) 495-6756**