

# Alcaris Privacy Policy

## ***Scope And Application Of The Alcaris Privacy Policy:***

The scope and application of the Alcaris Privacy Policy are as follows:

The Alcaris Privacy Policy applies to Personal Information about Alcaris Employees and non-employee Persons who interact with Alcaris that is collected, used or disclosed by Alcaris.

- Employees in this context includes past and present employees and independent contractors of Alcaris.
- Non-employee Persons in this context includes Individuals who are Clients, subscribers, job applicants, Internet users who are exposed to the media content of Alcaris and about whom Alcaris collects Personal Information.

The Alcaris Privacy Policy applies to the management of Personal Information in any form whether oral, electronic or written. Alcaris reserves the right to amend this Alcaris Privacy Policy from time to time.

The application of the Alcaris Privacy Policy is subject to the requirements or provisions of any applicable legislation, regulations or agreements (such as collective agreements), or the order of any court or other lawful authority.

**Exclusions from privacy protection:** The Alcaris Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by a Alcaris Company: a) information that is publicly available, such as a Person's name, address, telephone number and electronic address, when listed in a directory or made available through directory assistance; b) business-contact information, such as the name, title or business address or telephone number of an employee of an organization; c) information collected, used or disclosed in the course of journalistic, literary or artistic activities; or d) aggregate information that cannot be associated with a specific person, such as demographic statistics about Alcaris customers, or number of visitors and average time spent on a website.

## ***Purposes for Collection of Personal Information:***

Alcaris has collected and collects Personal Information for the following purposes: a) to establish and maintain responsible commercial relations with Individuals and to provide ongoing service; b) to understand Individual needs; c) to develop, enhance, market or provide products and services; d) to manage and develop its business and operations, including personnel and employment matters; and e) to meet legal or regulatory requirements, including to protect or defend a legal interest, and in connection with an actual or possible Alcaris corporate re-organization, merger or amalgamation with another entity, or an actual or possible sale of all or a substantial portion of the assets of Alcaris, provided that the Personal Information disclosed continues to be used by the entity acquiring the information either for evaluation of the possible transaction, or, on completion of any such transaction, for the purposes permitted by this Privacy Policy.

As examples of the above:

- i) Alcaris may from time to time use a Person's Personal Information to contact the Person about changes, enhancements or similar notices related to Alcaris products and services;
- ii) if a Person indicated that he/she was interested in receiving offers or information from

Alcaris or certain of our selected sponsors or advertisers, Alcaris may send the Person materials about products and services that Alcaris feels may be of interest to the Person; and

iii) if a Person enters a contest or other promotion offered on a Alcaris website, Alcaris may, under the rules of the promotion, use the Person's name and certain other information to administer the promotion, such as contacting, announcing and promoting the winners of the promotion.

### ***Obtaining Consent:***

Alcaris will make a reasonable effort to make sure Persons understand how their Personal Information will be used by Alcaris. Alcaris will obtain consent from Persons before or when it collects or uses the Personal Information. Alcaris will not attempt to deceive Persons into giving consent.

A Person's consent can be express, implied, or given through an authorized representative. A Person can withdraw consent at any time, with certain exceptions noted herein. Alcaris, however, may collect, use or disclose Personal Information without the Person's knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or as required by law.

Note: If any Person at any time has any questions or concerns about Alcaris's privacy practices, the Person can:

i) write to Customer Service at [support@alcaris.com](mailto:support@alcaris.com)

### ***Refusing or withdrawing Consent:***

Subject to legal and contractual requirements, a Person can refuse to consent to Alcaris's collection, use or disclosure of Personal Information about the Person, or a Person may withdraw the Person's consent to Alcaris's further collection, use or disclosure of Personal Information at any time in the future by giving Alcaris reasonable notice, unless: i) the consent relates to certain information required for credit approval which a Person applies for or accepts, ii) the consent is otherwise required by law or iii) the use or disclosure is permitted by law or is related to the legal or regulatory requirements described herein. If a Person refuses or withdraws the Person's consent, Alcaris may not be able to provide the Person or continue to provide the Person with some products, services or information which may be of value to the Person.

### ***Internet Aspects:***

Personal Information may be collected when a user conducts activities on or related to all websites of Alcaris Companies ("Alcaris Companies Sites") or related to services made available on the Alcaris Companies Sites ("Alcaris Companies Services"). Although information collected, used or disclosed on the Internet as described below often does not constitute Personal Information (and to the extent that such is the case, then the obligations under the Alcaris Privacy Policy do not extend to such information), Alcaris provides the details below about Internet aspects of Alcaris Companies Services for the purposes of disclosure about Alcaris Companies Services.

#### Internet Protocol Address (IP Address)

When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is

called the computer's "IP address." For most users accessing the Internet from a dial-up Internet service provider (ISP), the IP address will be different every time the user logs on.

Alcaris Companies may use the user's IP Address to:

- facilitate the diagnosis and remedy of a technical problem reported by the user's or Alcaris Company's technical team.
- display (or allow the display by Third Party advertising providers of) more appropriate and relevant content and advertising, such as content and advertising based on the user's geographic area.
- estimate user traffic from specific countries or organizations. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers.

### Cookies

A cookie is a small text file, which often includes an anonymous unique identifier, that is sent to the user's web browser from a website's computers and is stored on the user's computer's hard drive.

Cookies cannot be used to run programs or deliver viruses to a user's computer.

Alcaris Companies may use cookies to:

- improve the operation and performance of the Alcaris Companies Services and to make Alcaris Companies Services easier and more convenient to use. For example, cookies help Alcaris Companies provide more personalized services by recalling user preferences on subsequent visits (e.g. language preference). Cookies also allow Alcaris Companies to save passwords and preferences for a user so that the user will not have to re-enter them on the next visit to a Alcaris Companies Site;
- measure aggregate user traffic and demographic statistics related to Alcaris Companies Services and advertisements (e.g. number of users, average time spent, average age and similar statistics). This information helps Alcaris Companies to better understand when to update, change or offer new services and provides Alcaris Companies with details as to the performance of Third Party advertisements and content. This information may be reported, in aggregate form only, to Alcaris Companies' current and prospective sponsors, advertisers and business partners. No Personal Information will be disclosed in such reports;
- display advertisements. Alcaris Companies and Third Party advertising providers may use cookies when serving advertisements on Alcaris Companies Sites. In some cases, advertisements from Third Party advertisers are delivered to users (in conjunction with Alcaris Companies Services) by such Third Party advertisers, or by separately contracted advertising providers on their behalf, and not by Alcaris Companies; as such, the Third-party advertisers' use of cookies is subject to their own privacy policies, not the Alcaris Privacy Policy, and users should consult the privacy policies of such Third Party advertisers.

Most browsers are initially set up to accept cookies. If a user prefers, the user can reset his/her browser either to notify the user when the user has received a cookie, or to refuse to accept cookies. The user should understand that while Alcaris Companies do not require a user to use cookies, certain Alcaris Companies Services will not function properly if a user sets his/her browser to not accept cookies.

### Web Beacons

Certain Alcaris Companies Services may contain electronic images known as Web beacons - sometimes called single-pixel gifs - that allow Alcaris Companies to count users who have visited those pages and to deliver co-branded services. Web beacons are not used to access Personal Information; they are a technique used to compile aggregated statistics about Alcaris Companies service usage. Web beacons

collect only a limited set of information including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. Certain Alcaris Companies Services web pages may also contain Web beacons placed there by Alcaris Companies' advertising partners to help Alcaris Companies determine the effectiveness of Alcaris Companies' Internet advertising campaigns.

#### Links To Other Sites And Advertisements

A Alcaris Companies Service may contain links to other websites and services. While Alcaris Companies try to link only to sites and services that share Alcaris Companies' high standards and respect for privacy, a user should understand that Alcaris Companies are not responsible for the content of, or the privacy practices employed by, other companies or websites. This Alcaris Privacy Policy applies only to the Alcaris Companies Services related to this Alcaris Privacy Policy.

The majority of the advertisements which are displayed in connection with Alcaris Companies Services are served through one or more reputable Third Party advertisement-serving companies which deliver the advertisements to users in conjunction with Alcaris Companies Services.

#### Additional Information

Alcaris Companies automatically collect certain information about the user's computer hardware and software. This information may include: browser type, operating system type, domain names, access times and referring website addresses. This information is used by Alcaris Companies to operate the service, to maintain the quality of the service, and to provide general statistics regarding use of the Alcaris Companies Sites.

Certain Alcaris Companies Services may be co-branded and offered in conjunction with another company. If a user registers for or uses such services, both Alcaris Companies and the other company may receive information collected in conjunction with the co-branded services.

## **The Alcaris Privacy Policy in Detail**

### ***Definitions***

**Alcaris Companies** - all companies providing services under The Alcaris brand and their subsidiaries, and any successor company or companies thereof, as a result of corporate reorganization or restructuring.

**Collection** - the act of gathering, acquiring, recording or obtaining Personal Information from any source, including third parties, by any means.

**Consent** - voluntary agreement with the collection, use and disclosure of Personal Information for defined purposes. Consent can be either express or implied and can be provided directly by the Person or by an authorized representative. Express consent can be given orally, electronically or in writing but is always unequivocal and does not require any inference on the part of Alcaris. Implied consent is consent that can reasonably be inferred from a Person's action or inaction.

**Disclosure** - making Personal Information available to a Third Party.

**Employee** - an employee or independent contractor (including freelancers)<sup>1</sup> of Alcaris.

<sup>1</sup> The inclusion of independent contractors, including freelancers, within the definition of "Employee" is for convenience of reference only, and does in no manner imply that such individuals are employees of the company within the meaning of employment legislation or are in an employee-employer relationship with the company.

**Individual** - an individual other than an Employee who (a) corresponds with Alcaris, including complaints and including applications for employment; (b) enters an contest sponsored by Alcaris; or

(c) uses, or applies to use, the products or services of Alcaris.

**Person** - an Employee or an Individual.

**Personal Information** - information about an identifiable Person, but not: a) information that is publicly available, such as a Person's name, address, telephone number and electronic address, when listed in a directory or made available through directory assistance; b) business-contact information, such as the name, title or business address or telephone number of an employee of an organization; c) information collected, used or disclosed in the course of journalistic, literary or artistic activities; or d) aggregate information that cannot be associated with a specific person, such as demographic statistics about Alcaris customers, or number of visitors and average time spent on a website.

**Third Party** - a person other than the Person or his agent, or an organization other than a Alcaris Company.

**Use** - the treatment, handling, and management of Personal Information by the Alcaris Companies.