



## Website Privacy Policy

### **INTRODUCTION**

CENGN - Centre of Excellence in Next Generation Networks and our affiliates and subsidiaries (the "**Company**" or "**We**") respect your privacy and are committed to protecting it by complying with this policy.

This policy describes:

- How we collect, use, disclose and protect the personal information of our customers and website users ("**you**").
- The types of information we may collect from you or that you may provide when you visit the website [www.cengn.ca](http://www.cengn.ca) (our "**Website**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive and used for limited purposes.

Privacy laws generally define "personal information" or "personal data" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact or locate a single person. Personal information does not include business contact information, including your name or title.

This policy applies to information we collect, use, or disclose about you:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- When you interact with applications on third-party websites and services if those applications include links to this policy.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

This policy DOES NOT apply to information that:

- We collect offline or through any other means, including on any other Company or third-party website.



- You provide to or is collected by any third party, through any application or content that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you indicate that you understand, accept and consent to the practices described in this policy. This policy may change from time to time (see “*Changes to Our Privacy Policy*” below). Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.

## **INFORMATION WE COLLECT ABOUT YOU**

We collect and use several types of information from and about you, including:

- **Personal information or personal data**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, username or other similar identifier, billing and account information, social insurance number and any other identifier we may use to contact you (“**personal information**”).
- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, any email sent to us or any phone number used to call our customer service number.

## **HOW WE COLLECT INFORMATION ABOUT YOU**



We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email or otherwise.
- **Automated technologies or interactions**, as you navigate through our Website. Information collected automatically may include usage details, IP addresses and information collected through cookies.
- **Third parties or publicly available sources**, for example, our business partners.

### **Information You Provide to Us**

The information we collect directly from you on or through our Website may include:

- Information that you provide by filling in forms on our Website. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

### **Information We Collect Through Cookies and Other Automatic Data Collection Technologies**

As you navigate through and interact with our Website, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical information and may include personal information and we may maintain it or associate it with personal information we collect in other ways, that you provide to us or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.



- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see “*Choices About How We Use and Disclose Your Information*”.
- **Web Beacons.** Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

## **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- To improve our Website, products or services, marketing, or customer relationships and experiences.
- To allow you to participate in interactive features, social media, or similar features on our Website.



- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you, as permitted by law. If you do not want us to use your information in this way, please contact Robin Ramrup, Director of Finance & Corporate Governance, at 613-963-0023 or [legal@cengn.ca](mailto:legal@cengn.ca). For more information, see "*Choices About How We Use and Disclose Your Information*".

### **DISCLOSURE OF YOUR INFORMATION**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of CENGN - Centre of Excellence in Next Generation Networks' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by CENGN - Centre of Excellence in Next Generation Networks about our customers and users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of CENGN - Centre of Excellence in Next Generation Networks, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **TRANSFERRING YOUR PERSONAL INFORMATION**

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers and other third parties we use to support our



business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

You are welcome to contact us to obtain further information about Company policies regarding service providers outside of Canada. See "*Contact Information and Challenging Compliance*".

By submitting your personal information or engaging with the Website, you are providing your consent to the processing, storage, or transfer of your personal information as described above.

## **CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly. For more information about tracking technologies, see "*Information We Collect Through Cookies and Other Automatic Data Collection Technologies*".
- **Promotional Offers from the Company.** If you have opted in to receive certain emails from us but no longer wish to have your email address used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to Robin Ramrup, Director of Finance & Corporate Governance, at [legal@cengn.ca](mailto:legal@cengn.ca).

## **DATA SECURITY**



The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use, without your consent, such anonymous and de-identified data for any legitimate business purpose without further notice to you.

### **CHILDREN UNDER THE AGE OF 13**

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact Robin Ramrup, Director of Finance & Corporate Governance, at 613-963-0023 or [legal@cengn.ca](mailto:legal@cengn.ca).

### **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**





It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

If you want to review, verify, correct, or withdraw consent to the use of your personal information you may also contact Robin Ramrup, Director of Finance & Corporate Governance, at 613-963-0023 or [legal@cengn.ca](mailto:legal@cengn.ca) to request access to, correct or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may charge you a fee to access your personal information, however, we will notify you of any fee in advance.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions include:

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that is about another individual that would reveal their personal information or confidential commercial information.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact our Data Privacy Officer: Robin Ramrup, Director of Finance & Corporate Governance, at 613-963-0023 or [legal@cengn.ca](mailto:legal@cengn.ca).

## **WITHDRAWING YOUR CONSENT**

Where you have provided your consent to the collection, use and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact Robin Ramrup, Director of Finance & Corporate Governance, at 613-963-0023 or [legal@cengn.ca](mailto:legal@cengn.ca). Please note that if you withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.





## **CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page.

We include the date the privacy policy was last revised at the bottom of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## **CONTACT INFORMATION AND CHALLENGING COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

**Robin Ramrup, CPA, CGA, MBA**

Director of Finance & Corporate Governance



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We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Privacy Officer using the contact information listed above.