

# Our Privacy Policy

SOCIALLY MONTREAL and its affiliates (hereinafter referred to collectively as “SOCIALLYMONTREAL” or “we”) respects the privacy and confidentiality of your Personal Information used in our business processes and adheres to the standards and expectations of the privacy legislation in Canada. We have privacy policy that explains how it collects, uses, discloses, and protects your Personal Information. The confidentiality of your personal information and protection of your privacy are important to us.

## What is Personal Information?

“Personal Information” is a broad term that includes any information about or that can be used to identify an individual. The types of personal information we may collect about an individual will depend upon the nature of the services we are requested to provide or the purpose for collecting the information. Personal Information may include business contact information, including your name, title or position, business or business email address, telephone or facsimile number in your capacity as an employee of an organization. Personal Information also excludes certain publicly available information, such as information listed in a public telephone directory.

Consent.

If you choose to use our services and/or submit your Personal Information to SOCIALLYMONTREAL, then you are providing your consent for SOCIALLYMONTREAL to retain your Personal Information, and use it in the conduct of our business activities. For example, if you submit your resume through our website to apply for a search we are conducting for a client, you are providing your consent for us to use your Personal Information in the context of our search businesses. You may withdraw your consent to the use and disclosure of your Personal Information at any time, unless it is necessary for us to use your Personal Information to fulfill our legal obligations. Please contact us if you would like to withdraw your consent (See “Questions and Complaint” below).

### Collection and Use of Your Personal Information.

We collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances, and we limit the amount and type of personal information we collect, use or disclose to that necessary for the purposes identified. Generally speaking, SOCIALLYMONTREAL collects, uses and discloses personal information of clients and other individuals for the primary purpose of providing our services and advice on matters in which we have been retained.

We will also collect your Personal Information when you are applying for a search that we are conducting for a client. This information may be acquired from resumes, cover letters, telephone conversations, interviews, security or criminal checks, and/or academic verifications.

We may collect your Personal Information if you are applying for employment within our company. If hired, more Personal Information will be required for payroll, compensation and benefits, office security and emergency services. In all cases after collecting your Personal Information, it may be used by SOCIALLYMONTREAL to communicate with you from time to time for reasons such as ensuring the information that we have about you is correct, to communicate with you about opportunities for employment, to provide you with information about SOCIALLYMONTREAL and its services, and/or to communicate with you about other appropriate business matters.

### Cookies

By using a browser feature called a “cookie” and other methods, SOCIALLYMONTREAL and our third party service providers may gather non-personal information when you visit our websites such as data about the frequency of your visits to our websites, the duration of your visits, the number of pages you view and the type of Internet browser and operating system you use. A cookie is a small text file containing a unique identification number that identifies the visitor’s browser, but not necessarily the visitor, to our computers each time our websites are visited. Website visitor information is collected on an anonymous basis, which means that no Personal Information is associated with such data, unless a visitor specifically provides us with such information.

Disclosing Personal Information.

SOCIALLYMONTREAL does not sell or distribute Personal Information in any circumstance. SOCIALLYMONTREAL may disclose your Personal Information in the normal course of providing our business services in the following ways: If we disclose any Personal Information about you, it will only be used for project purposes, and with your prior consent. SOCIALLYMONTREAL may disclose your resume or any Personal Information about you to our clients, for the purpose of providing you with a recruiting opportunity, only with your prior consent. This information will only be used to evaluate your suitability for the role, or potentially other opportunities as well.

When you accept employment with SOCIALLYMONTREAL, your Personal Information will be disclosed to: third-party insurers, government authorities, our provider for employee benefits, our payroll administrator, our banks, consultants who advise our company regarding employee benefits and other compensation information or issues, staff responsible for hiring and/or performance management, and to legal counsel if ever required. Certain Personal Information will be provided to our office building managers for office security and parking security purposes. Personal Information may also be used for emergency contact information.

SOCIALLYMONTREAL may be involved in the sale, merger or restructuring of some or all of our business or assets. In the course of such transaction, SOCIALLYMONTREAL may disclose your Personal Information to the purchaser or new corporate entity. In such case, we will require such third parties to agree to protect the privacy of your Personal Information in a manner that is consistent with this Privacy Policy and in accordance with applicable privacy laws.

In addition, in certain circumstances, SOCIALLYMONTREAL may disclose your Personal Information to comply with applicable laws, respond to inquiries or requests from government authorities, or if compelled by legal process.

Protecting Your Personal Information.

In the normal course of providing our services, we utilize both our own technology and third-party IT providers. Where we utilize our own technology, your Personal Information is stored in secure databases on locked servers. We use technological safeguards such as data encryption for security of information, firewall protection and virus protection software, and strong password protection to ensure security, and prevent unauthorized computer access. Where

SOCIALLYMONTREAL utilizes third-party IT providers, your Personal Information may be transferred and/or stored on technology not owned by SOCIALLYMONTREAL, and that may be located in the Canada, United States or other country. SOCIALLYMONTREAL reviews all-third party IT providers for their security practices, privacy policies and general business reputation. Contractual and other means are used to ensure that the level of protection provided is comparable to the high level of security that SOCIALLYMONTREAL provides when we utilize our own technology. You should be aware that where your Personal Information is transferred and/or stored on technology outside of Canada, your information may be accessible to law enforcement and national security authorities of those jurisdictions in certain circumstances.

All SOCIALLYMONTREAL employees sign a confidentiality agreement and are educated with respect to handling your Personal Information in a confidential manner.

We protect Personal Information in a manner appropriate to the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of Personal Information, as well as any unauthorized access to Personal Information.

#### Retention of Personal Information

SOCIALLYMONTREAL retains your Personal Information as described below:

Consulting: SOCIALLYMONTREAL will retain your Personal Information only as long as it is required to complete our projects. Search: We will retain your Personal Information in our confidential database in order to contact you again to discuss future opportunities, unless you specifically request otherwise.

Employment with SOCIALLYMONTREAL: We will retain your Personal Information throughout your employment and for at least seven years after your employment with SOCIALLYMONTREAL ends, as required by Canada Customs and Revenue Agency.

Removal/Disposal of Personal Information.

We use appropriate security measures, such as professional waste management for the destruction of any hard copy information, to dispose of any Personal Information. If the information is electronic, then the information is permanently deleted from our server.

Access and Accuracy of Your Personal Information.

You may make a request to access your Personal Information by writing to our Customer care Center and providing sufficient information in your request to allow us to identify the information you are seeking. We will respond to your request within 45 calendar days and a reasonable fee to provide information may apply. If we need more time, we will provide an explanation and time-frame. If we refuse your request in whole or in part, we will provide you the reasons for the refusal. For example, we may not be able to provide information about you from our records if it contains references to other persons or cannot be disclosed for legal reasons.

Please inform our Customer Care Center if we need to make any changes to your Personal Information so that it is as accurate as possible. When necessary the corrections will be made as soon as reasonably possible and we will notify anyone we may have misinformed.

### Changes to Our Privacy Policy

We reserve the right to change our Privacy Policy at any time by updating our Privacy Policy on our website. Please check back frequently for the most current version of our Privacy Policy.

### Questions and Complaints

If you have a question or concern about your Personal Information, or want to request access to your Personal Information, please contact:

**GETSOCIAL@SOCIALLYMONTREAL.COM**