

## PRIVACY POLICY

“**Absolute Results**” means the Absolute Results Group of Companies and any entities and corporations, whether parent, subsidiaries, or affiliates making part of the “Absolute Results” group of entities and their respective shareholders, directors and officers (collectively, the “company” or “AR Group”).

### 1. *Overview*

At Absolute Results we know you care about how your Personal Data is used and shared, and we take your privacy seriously. We are committed to providing you with superior service while protecting your privacy and safeguarding your Personal Data.

Most of the countries where Absolute Results provides Services have data protection or privacy laws designed to regulate and safeguard the collection, use, transfer, storage and disposal of Personal Data. Absolute Results is committed to complying with the data protection and privacy laws of the countries where Personal Data is collected and processed.

Please read the following to learn more about how we collect, store, use and disclose information about you when you interact or use our websites (collectively the “Websites”) or any related events, trade shows, sales or marketing, and/or if you use any of our products, Services or applications (collectively the “Services”) in any manner.

### 2. *Purpose*

This Privacy Policy covers our treatment of information that we gather when you are accessing or using our Websites or Services or when you contact us in any manner. We gather various types of information, including information that identifies you as an individual (“Personal Data”) from our users, as explained in more detail below.

### 3. *Scope*

The Privacy Policy covers the Personal Data Absolute Results processes as a Data Controller and the Personal Data Absolute Results processes as a Data Processor. This Personal Data includes Employees’ Personal Data processed for work related purposes, as well as Business Client’s Personal Data processed for business related purposes. When acting as a Data Processor, this may also cover any other type of Personal Data as requested by the Data Controller.

The Privacy Policy applies to all Absolute Results companies and offices that process Covered Personal Data as Data Controllers or as Data Processors. The Privacy Policy reflects EU Law and the national data protection laws of the European Economic Area (EEA) countries. Where other country specific rules apply to Covered Personal Data, Absolute Results will apply these rules in addition to the Privacy Policy.

### 4. *Data Protection and Privacy*

As a company operating globally, we strive to be in compliance in all areas of operation. We collect and protect data in accordance with: the Canadian Standards Association guidelines for Personal Data protection, Canada’s Anti-Spam Legislation (CASL), The Personal Information Protection and Electronic Documents Act (PIPEDA), the US Federal Trade Commission Act, the Gramm-Leach-Bliley Act 15 U.S.C. §6801, US Federal

law, including the Electronic Government (E-GOV) Act of 2002 and the Privacy Act of 1974 and later revisions by the Computer Matching and Privacy Protection Act of 1988, P.L. 100-503, the 2017 Australian Privacy Principles (APPs) from Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and Privacy Amendment (Notifiable Data Breaches) Act 2017, the New Zealand Privacy Act 1993 (Nbr28) including current revisions, the European Parliament and Council of the European Union General Data Protection Regulation (EU) 2016/679 (GDPR) and many other country specific laws and regulations.

To ensure effectiveness, Absolute Results has a comprehensive privacy compliance program that ensures our policies, procedures, practices and security measures are adequately complied with by our employees and representatives throughout our organization. In addition, we have established and implemented:

- Global privacy and information protection regime
- Privacy-by-design, built into all data management processes
- Dedicated Data Protection Officer
- Privacy and security awareness training
- Account specific privacy and security processes
- Monitoring of compliance and regulatory privacy requirements
- Monitoring of contractual privacy requirements
- Global Critical Incident Response policy and plan
- Binding Corporate Rules for Data Controller and Data Processor roles

The Absolute Results Data Privacy Policy articulates the principles governing the processing of Personal Data for the group. Compliance is mandatory for all Absolute Results companies and employees collecting or processing Personal Data whether acting as a Data Controller or Data Processor.

## **5. Privacy by Design**

Absolute Results uses and provides Services through a secure multi-tenant cloud computing platform and on-premise systems designed using hardened redundant systems and industry standard principles of secure computing, storage, intrusion detection, prevention and external testing.

The Services operate on premise and within a global secure private cloud infrastructure. A secure multi-layer firewalled architecture restricts access to data solely to business layer APIs and a rigid separation of internal and production systems to protect customer data is enforced by design. Data in transport is secured using SSL and TLS 1.2 or higher, AES256 is used for data at rest and secured encrypted data is managed using sha512 hashing and pbkdf2 to generate AES encryption. Personal Data retained for research, profiling and predictive analysis is stored in an encrypted and anonymized or pseudo anonymized format.

## **6. Accountability**

Primary responsibility for data protection lies with the company and the company has put in place a data privacy governance structure with a designated Data Protection Officer (“DPO”) to oversee the privacy compliance program and Data Subject Right Requests. Our Data Protection Officer is:

Mr. Josh Heppner, he may be contacted by email at: [Privacy@absoluteresults.com](mailto:Privacy@absoluteresults.com)

Or by postal mail to our main office address:



Absolute Results  
Attn: Data Protection Officer  
104 – 2677 192nd Street  
Surrey, BC, V3Z 3X1, Canada

## **7. Policy**

### **7.1. Collect Process Personal Data in a Fair and Lawful Manner**

Absolute Results collects and processes Personal Data in a fair, transparent and lawful manner in compliance with Applicable Law and the Data Controllers instructions where applicable.

When acting as a Data Processor, Absolute Results will assist the Data Controller in doing the same.

This includes respecting the Data Subject's rights by updating, correcting or deleting the Personal Data accordingly so that it is accurate and where necessary kept up-to-date in accordance with applicable procedures.

### **7.2. Why We Collect and Use Personal Data**

#### **7.2.1. Collecting Personal Data**

Collecting Personal Data about you is essential to our being able to provide the Services that best meet the needs of both yourself and/or authorized third parties ("Client"). While the Personal Data we collect may come directly from you (client), it may also be collected and/or aggregated through the use of automated means, or provided by our affiliates or other third parties.

#### **7.2.2. Personal Data May be Used:**

- (a) to determine eligibility for products and Services;
- (b) to process applications for Clients, and provide requested information, products or Services;
- (c) to understand and assess Clients' ongoing needs and offer Services to meet those needs;
- (d) for billing and accounting services relating to our Services;
- (e) for Client communication, service and administration;
- (f) for claims administration;
- (g) for internal, external and regulatory audit purposes;
- (h) to comply with legal and regulatory requirements; or
- (i) to share or exchange reports and information with credit reporting agencies, credit bureaus, and any other person, corporation, firm or enterprise to verify the accuracy of Personal Data.

#### **7.2.3. Other Use of Personal Data**

Personal Data may also be used for other purposes, subject to obtaining your prior consent for such use.

### **7.3. Consent to Use Personal Data**

#### **7.3.1. Obtaining Consent**

Consent may be obtained in various ways. We may obtain your express consent or may determine that consent has been implied by the circumstances. Express consent could be in writing (for example in a signed consent, e-mail or application form), or verbally in person or over the telephone. When we receive Personal Data from you that enables us to provide you with a requested product or Services, your consent to allow us to deal with that Personal Data in a reasonable manner would be implied. If you need to provide Personal Data about other individuals (such as customers, employees, dependents, etc.), you must first obtain their consent for these purposes prior to your disclosure to us.

#### **7.3.2. Provision of Personal Data – Your Choice**

Providing us with your Personal Data is always your choice. When you request Services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such Personal Data for these purposes. You also authorize us to use and retain this Personal Data for as long as it may be required for the purposes described above. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. By withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you or an authorized third party (such as an employer) with the Services desired.

#### **7.3.3. Legal Exceptions**

In certain circumstances, there are legal exceptions where we will not need to obtain consent or explain the purposes for the collection, use or disclosure of Personal Data. For example, this exception would apply if there is an emergency that threatens the life, health or security of an individual, or if we must comply with a court order.

### **7.4. Sharing Personal Data with Others**

- 7.4.1.** We are not in the business of selling client lists or Personal Data to others. In providing our Services, we may need to disclose the Personal Data we collect to affiliates, subsidiaries, successors and other service providers or agents who perform various functions for us.
- 7.4.2.** As Absolute Results continues to develop and grow, we may buy or sell parts of a business. As our businesses consist primarily of client relationships, information regarding the particular accounts or Services being purchased or sold could include Personal Data and be one of the transferred business assets.
- 7.4.3.** In certain circumstances, we may be required to provide Personal Data to third parties for legal or regulatory purposes.
- 7.4.4.** We may also use this Personal Data to assess your future needs and to offer the Services that may best meet those needs, from ourselves, our affiliates or reputable organizations selected by us. If you do not wish to receive these offers or such information, please contact our Data Protection

Officer as outlined above, in the contact information section.

### ***7.5. International Transfers of Your Personal Data***

As a global organization, with offices and clients in multiple countries, Absolute Results Group of Companies needs to ensure that Personal Data flows freely and securely between Absolute Results offices with an appropriate and consistent level of protection.

In order for Absolute Results to operate effectively and provide a full range of Services for our clients, at the client's direction or providing there is a legitimate need, client Personal Data may be transferred, processed and stored at Absolute Results offices and data centres outside of the EEA.

Absolute Results has established Binding Corporate Rules (collectively referred to as the "BCRs") that have been adopted to express Absolute Results commitment to establishing and maintaining high standards across the Group for the transfer and processing of Personal Data by the Absolute Results Companies.

The BCRs are designed to cover the flow of Personal Data transferred within Absolute Results, including to countries located outside the EEA, for the processing purposes described in this document, so as to facilitate a free and secured flow of Personal Data between the Absolute Results Companies. The BCRs cover the Personal Data processes as a Data Controller and the Personal Data processes as a Data Processor.

If Absolute Results has received your Personal Data and subsequently transfers that information to another Absolute Results company or sub processor for processing, Absolute Results shall remain responsible for ensuring that your Personal Data is processed to the standard required by our BCRS and Data Security and Protection Policies.

### ***7.6. Processing Personal Data Securely***

When processing Personal Data, the company uses processes and tools that integrate privacy from their inception (privacy-by-design) and performs privacy impact assessments as required by Applicable Law.

As a general rule and unless otherwise requested by the client, Absolute Results applies the same level of security to Personal Data it processes as a Data Processor and Personal Data it processes as a Data Controller.

Absolute Results applies and maintains appropriate technical, physical, and organizational measures to protect Personal Data, and follows industry practices and standards in adopting procedures and implementing systems designed to prevent unauthorized access to Personal Data and to avoid its accidental loss, damage or destruction.

When acting as a Data Processor, Absolute Results complies with the security and organizational measures which at least meet the requirements of the Data Controller's Applicable Law and the provisions of the Service Agreement. Absolute Results shall promptly inform the Data Controller of any Security Breach and shall ensure that its Processors are bound by equivalent obligations.

### ***7.7. Your Rights***

**7.7.1.** Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

**7.7.2.** As part of these Rights, Absolute Results has adopted the following ten principles for the Protection of Personal Data.

- (a) **Individual's Access:** On written request to our Data Protection Officer, an individual will be informed of the existence, use and disclosure of their Personal Data that is under our control, and may be given access to that Personal Data as required and permitted by applicable law.
- (b) **Accuracy:** We shall keep Personal Data as accurate, complete and up-to-date as may be necessary to fulfill the purposes for which it is to be used. Individuals are entitled to challenge the accuracy and completeness of that Personal Data and request that it be amended, if appropriate.
- (c) **The Right to be forgotten:** In some circumstances you have the right to the erasure of your Personal Data without undue delay. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for compliance with a legal obligation or for the establishment, exercise or defense of legal claims.
- (d) **Limiting Use, Disclosure and Retention:** Personal Data shall only be used or disclosed for the purposes for which it was collected, unless an individual has otherwise consented or when it is required or permitted by law. Personal Data shall be retained only as long as necessary for the fulfillment of those purposes.
- (e) **Limiting Collection:** The Personal Data Absolute Results collects shall be limited only to that which is necessary for the purposes identified.
- (f) **Identifying Purposes:** The purposes for which Personal Data is collected shall be identified before or at the time the Personal Data is collected.
- (g) **Consent:** Individual's consent will be obtained for the collection, use or disclosure of Personal Data, except where applicable law provides an exemption.
- (h) **Accountability:** Absolute Results is responsible for maintaining and protecting the Personal Data under its control and shall designate one or more individuals to be accountable for that company's compliance with these principles.
- (i) **Safeguards:** Absolute Results shall protect Personal Data using security safeguards that are appropriate to the sensitivity level of the Personal Data received.
- (j) **Openness:** Absolute Results will provide information to individuals about Absolute Results policies and procedures relating to the management of Personal Data that is under our control.
- (k) **Handling Enquiries or Complaints:** Any questions or enquiries concerning compliance with our privacy policies and procedures may be addressed to our Data Protection Officer, as set out above.

### **7.8. Privacy and the Internet**

Absolute Results Web Sites may contain links to other third-party sites that are not governed by this Privacy Policy. Although we endeavor to link only to sites with high privacy standards, our Privacy Policy will no

longer apply once you leave our Web Sites. We are not responsible for privacy policies employed by other third parties or any foreign affiliates, since they would be governed by privacy legislation applicable in their country of residence. We suggest, you exercise caution and you examine the privacy statements of those sites to learn how Personal Data may be collected, used and/or disclosed

### **7.9. Minors and Children**

Protecting the privacy of young children is especially important. Our Web Sites and Services are not directed to children under the age of 18, and we do not knowingly collect Personal Data from children under the age of 18 without obtaining parental consent. If you are under 18 years of age, then please do not use the Web Sites or access the Services at any time or in any manner. If we learn that Personal Data has been collected on the Services from persons under 18 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has submitted Personal Data on our Web Sites or accessed the Services, then you may alert us at [privacy@absoluteresults.com](mailto:privacy@absoluteresults.com) and request that we delete that child's Personal Data from our systems.

The Services are not intended to be used by minors. To the extent that a minor has posted such content on the Services, the minor has the right to have this content deleted or removed using the deletion or removal options detailed in this Privacy Policy. Please be aware that, although we offer this deletion capability, the removal of content may not ensure complete or comprehensive removal of that content or information.

### **7.10. How We Use Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for:

- Assisting you in navigation;
- Assisting in registration, login, and your ability to provide feedback;
- Analyzing your use of our Services or applications;
- Assisting with our promotional and marketing efforts, including behavioral advertising; and
- Statistical analysis purposes.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We also may use clear gifs in HTML-based emails sent to our users to track which emails are opened by recipients. This information is used to enable more accurate reporting, improve the effectiveness of our

marketing, and make our Services and Websites better for our users.

We also utilize Google Analytics, a web analysis service provided by Google, to better understand your use of our Websites and Services. Google Analytics collects information such as how often users visit the Websites, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the Websites, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Websites to contextualize and personalize the ads of its own advertising network. Google’s ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google offers an opt-out mechanism for the web available [here](#).

You can accept or reject cookies by adjusting your web browser controls. To prevent the download of cookies, or otherwise control how cookies are used on your computer, please read the Help information supplied with your internet browser software or go to <http://www.allaboutcookies.org> for full information.

**7.10.1. The Following Types of Cookies Are Used:**

- (a) Strictly necessary/essential cookies - These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies Services you have asked for cannot be provided. These cookies don’t collect information that identifies a visitor.
- (b) Performance cookies - These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don’t collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.
- (c) Functionality cookies - These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide Services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.
- (d) Behaviorally targeted advertising cookies - These cookies are used to deliver advertisements more relevant to you and your interests They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator’s permission. They remember that you have visited a website and this information is shared with other organizations such as advertisers.

**7.10.2. The Following Cookies are used:**

DOMAIN	COOKIE NAME	EXPIRATION	CONTENT
qTranslate X	qtrans_front_language	1 year	It provides a way to designate which fields on a page or post are to be multilingual.
Google Analytics	_gat	1 minute	Used to throttle request rate.
Php.net	PHPSESSID	session	A default identifier that PHP uses for cookies.



Google Analytics	_gid	24 hours	Used to distinguish users.
Google Analytics	_ga	2 years	Helps to identify sessions of visitors.

**Contest Websites (RSVP Websites)**

ENG: <http://maysavings.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
_pk_ses.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
maysavings	session	It identifies new visitor in the site.

ENG: <http://ramrevolution.ca/code>

FR: <http://revolutionram.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
_pk_ses.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
ramrevolution	Session	It identifies new visitor in the site
revolutionram	Session	It identifies new visitor in the site

ENG: <http://trademykeys.ca/code>

FR: <http://echangeonsmescles.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
_pk_ses.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
Trademykeys	Session	It identifies new visitor in the site
echangeonsmescles	Session	It identifies new visitor in the site

<http://jeepprevolution.ca/>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
jeepprevolution	Session	It identifies new visitor in the site

ENG: <http://doitalloveragain.ca/>

FR: <http://remontonsdansletemps.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
doitalloveragain	Session	It identifies new visitor in the site
remontonsdansletemps.ca	Session	It identifies new visitor in the site

ENG: <http://licencetosave.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
licencetosave	Session	It identifies new visitor in the site

ENG: <http://tradesooner.ca/code>

FR: <http://echangezmaintenant.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
tradesooner	Session	It identifies new visitor in the site
echangezmaintenant	Session	It identifies new visitor in the site

ENG: <http://timetotrade.ca/code>

FR: <http://cestletempsdechanger.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
timetotrade.ca	Session	It identifies new visitor in the site
cestletempsdechanger	Session	It identifies new visitor in the site

ENG: <http://thatsadeal.ca/code>

FR: <http://cestuneaubaine.ca/code>

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website

_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website
thatsadeal	Session	It identifies new visitor in the site
cestuneaubaine	Session	It identifies new visitor in the site

#### All Generic RSVP Websites

COOKIE NAME	EXPIRATION	CONTENT
_pk_id.*	1 year	Used to avoid counting a person twice when counting how many people visit the website
_pk_ses.*	30 mins	Used to track a session, i.e., how long a visitor is on the website

#### 7.11. *Changes and Updates*

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Services, and indicate the date of the latest revision and will comply with applicable law. Your continued use of the Services after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Privacy Policy.