# **HRWARE Privacy Policy**

#### Scope

HRWARE is committed to protecting the confidentiality of our customer information and the personal information of our customers' employees. Hence, HRWARE has implemented a Privacy Program built on the principles of PIPEDA (Personal Information and Protection Electronics Document Act).

## Accountability

This Privacy Policy is applicable to all information that HRWARE processes under the direction of its customers when using our web enabled Human Resource Management software products. HRWARE expects our employees and partners to maintain the trust placed in us, and we periodically assess privacy compliance.

We do not trade, sell or lease personal information entrusted to us. Our products and services are not directed to children and we do not knowingly collect or maintain information from anyone under 13.

HRWARE has no direct control or ownership of the personal data it processes. We are not responsible for the content of free text fields that are entered by our customers.

# **Purpose - Why We Collect Personal Information**

The information collected through our products is solely for the purpose of providing the service to our customers. HRWARE does not acquire any more information than what is necessary to provide a high level of service or if required by law. Some of this information may be collected directly from an individual, however most information is collected by our customers relating to the use of our products and services.

We may also automatically collect certain usage information when you access our Services ("Usage Data"), such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. We may also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data.

Our Services may change over time and we may introduce new features that may collect new or different types of information.

#### Consent

Customers are responsible for obtaining consent when they collect information in relation to our Human Resource Management products.

## **What Personal Information Do We Collect**

Our products requires customers to collect individual contact information such as name, birth date, gender, SIN and home addresses and phone numbers or unique identifiers such as employee number or

pictures. This information is used to create access to services on the product, to send processing related alerts or notifications and to contact users of the product.

Our Human Resource Management products require a minimum set of employee profile data to function properly, including, but not limited to, employee name, employee number, and hire date. Customers collect this information from their employees and enter it into the product for it to work effectively. Our products allow for other work-related information to be used and stored such as contact phone number, earnings, professional licenses, and union membership, etc. Our customers determine which of these fields are necessary for their operations.

#### **Who Sees Your Personal Information**

HRWARE customer service representatives have access to some transaction information in order to respond to customer questions related to our Human Resource Management products.

It is HRWARE's policy to never provide information to third parties unless such disclosure is necessary to process transactions or provide services for which we have been contracted. For example, information about transactions are forwarded to payment processors and banks.

The only exception to any part of this section is if HRWARE is compelled to do so by an appropriately empowered governmental authority.

## **Retention and Destruction of Personal Information**

Our Human Resource Management products require data to function effectively. The customer determines how long they wish to maintain employee records within the system.

Once a customer is no longer a customer, data is removed from HRWARE systems within 90 days.

## **Protection of Personal Information**

HRWARE will endeavour to protect personal information from loss, theft, unauthorized access, unauthorized disclosure or modification and destruction through appropriate administrative, technical and physical security measures and safeguards. The level of safeguards used to protect personal information will depend on the sensitivity of the personal information. No technology is 100% so while we strive to protect your personal information, we cannot guarantee its absolute security.

#### **Access to and Correction of Personal Information**

HRWARE relies on customers to keep the information they store in our Human Resource Management products accurate and up to date. Individuals who want access to the information stored within the software are referred to their employer.

In the rare event that a customer is not available to provide access, an individual may request access in writing, via the contact information provided below.

#### **Changes to this Policy**

Any updates or changes to our Privacy Policy will be posted here and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if

any, we disclose it. We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Policy, we will notify you here, by email, or by a notice on our website.

## **Contact Information**

For questions or comments regarding this Policy, the Privacy program in general, or to file a complaint about how personal information has been handled, please contact:

Privacy Office HRWARE 5B Conestoga Drive, Brampton, ON L6Z 4N5 1-844-4.HRWARE

If HRWARE receives a complaint, we will investigate it and respond to the individual filing the complaint within 45 days of receiving it. If an individual is not satisfied with the response, they may file a formal response with the Privacy Commissioner in their province or the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner of Canada 30 Victoria Street Gatineau, Quebec K1A 1H3 1-800-282-1376