

PRIVACY POLICY

Circle6 Solutions Inc. (“**Circle6**”, “**we**”, “**us**” or “**our**”) is committed to protecting the privacy and security of your information. This privacy policy (“**Policy**”) describes how we collect, use and disclose your personal information and how this personal information can be consulted and corrected when necessary. This Policy also explains how cookies are used on our Website.

By visiting <<http://www.circle6.com/>> (“**Website**”), contacting us or agreeing to receive emails from Circle6, you accept the terms and conditions of this Policy.

This Policy does not extend to websites operated by third parties. Circle6 is therefore not liable for their privacy policies, procedures and practices.

1. Collection of Information

We collect your personal information in different ways, including when you request information, contact us by telephone or by email, etc. Depending on the circumstances, personal information may include your first name, last name, phone number, email address, needs or requests.

We also collect data relating to your visit to our Website. This information may include your IP address, the date, time and duration of your visits as well as the web pages you consulted. Our Website, like most other commercial websites, also uses cookies. These are files that are installed on your computer hard drive or web browser in order to collect information such as your language of preference, browsing history and browser type and version, all for the purpose of optimizing your experience on our Website. We use cookies to compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf. These cookies cannot be used to extract personal information. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to disable all cookies. Disabling cookies on your browser could adversely affect your browsing experience on the Website.

We may obtain information, including personal information, from third parties and sources other than via our Website, such as our trusted marketing partners (such as Sysomos using its own [privacy policy](#)). If we combine or associate information from other sources with personal information that we collect, we will treat the combined information as personal information in accordance with this Policy.

2. Use and Communication of Information

We take steps designed to ensure that only those employees who need access to your personal information to fulfil their employment duties will have access to it. We use and disclose your personal information mainly:

- to operate, maintain, enhance and provide all features of the Website, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Website;

- to understand and analyze the usage trends and preferences of our users, to improve the Website, and to develop new products, services, feature, and functionality;
- to send you communications subject to applicable laws; or
- for any other purposes authorized or required by law.

When we disclose your personal information to service providers, we take reasonable measures to ensure that the rules set forth in this Policy are complied with.

In the event of a change of ownership, sale, merger, liquidation, reorganization or acquisition of Circle6, in whole or in part, your personal information may be transferred as part of the transaction.

3. Retention of Information

Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers. By using our Website, you consent to the transfer of information to countries outside your country of residence which may have different data protection rules than in your country. While such information is outside of Canada, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

Circle6 has implemented various physical, administrative and technical safeguards designed to protect the confidentiality and security of personal information under our control. However, no security measures are absolute or wholly guaranteed.

Circle6 will maintain your personal information for as long as a business need exists, or as required by applicable laws, regulations, or government orders.

4. Right to Access and Correct

On written request and subject to proof of identity, you may access the personal information that we hold, and ask that any necessary corrections be made, where applicable, as authorized or required by law.

However, to make sure that the personal information we maintain about you is accurate and up to date, please inform us immediately of any change in your personal information.

5. Surveys

From time to time, Circle6 may invite you to participate in surveys that Circle6, its clients or a third party may administer. These surveys are optional, and may include personal information. They may also include questions about your experience with our services and their specific features. Such surveys are meant to help us better understand the needs and requirements of our customers so we can continue improving our products and services. The results of these surveys may be shared in aggregate format with third parties.

6. Update

We will update this Policy from time to time to reflect changes to our practices, technology, legal requirements and other factors. Please check the “Last Updated” legend at the bottom of this page to see when this Policy was last updated. When changes are made to this Policy they will become immediately effective when published in an updated Policy posted on this page unless otherwise noted. Your use of the Website following these changes indicates your consent to the practices described in the updated Policy.

7. Contact

If you have any questions or comments about this Policy or your personal information, to make an access or correction request, to make a complaint, or to obtain information about our policies and practices with respect to any service providers outside Canada, our Privacy Officer can be reached by email using the following contact information: hello@circle6.com

Last Update: March, 2019