

## CCR Solutions Inc. Privacy Policy

CCR Solutions Inc. (“CCR”, “we,” “our,” or “us”) is committed to respecting and protecting your privacy and the confidentiality of the information we collect about you and that you entrust to us. The purpose of this privacy policy (the “Policy”) is to explain how and for what purposes CCR collects, uses, discloses or otherwise processes your personal information and how we safeguard the confidentiality of your personal information.

### 1. Scope and application

This Policy applies to personal information collected in the course of CCR’s business activities, including through service delivery, contractual relationships, and website interactions (accessible through the following domain: <https://www.ccrsolutions.com/>).

In this Policy, we describe our policies and practices with respect to the collection, use and disclosure of personal information and the measures taken to ensure its continued protection. We also describe the rights and choices you have regarding your privacy.

### 2. Definition of “personal information”

In this Policy, “personal information” refers to any information which could be used alone or in combination with other information to identify an individual. This may include, for example, your name and contact information. It may also include more technical information, such as your IP address, browser settings and device ID, but only when this information can identify you as an individual.

### 3. What categories of personal information do we collect?

CCR limits the collection of personal information to what is necessary to fulfill the purposes identified in this Policy. CCR does not knowingly collect personal information from minors. Our services and website are intended for adults.

CCR may collect the following personal information about you depending on your interactions with us:

- **Identifiers**, such as your full name, email address, mailing address, telephone number.
- **Browsing activity**, when you visit our website. This information is collected via automated means, such as cookies, IP address, device ID, browser type, logs, system usage data, analytics data, form submissions, and usage behaviour.
- **Audio-visual recordings and events information**, processed as part of CCR’s services.
- **Any other information you provide to us**, such as when you contact us by email, on the phone or in-person.

### 4. How do we collect your personal information?

CCR collects personal information in a variety of ways, including directly from you, from third parties and through our website.

**a. Directly from you**

CCR may collect personal information directly from you, such as when you provide us with personal information through contracts and service agreements.

**b. From third parties**

In certain circumstances, CCR may receive personal information from third parties.

**c. Through our website**

CCR collects technical information and information about your device and browser when you visit our website, using technologies, such as cookies. Some of these technologies may be operated by third parties. This information supports the functioning of our website and helps us understand how you navigate and use our website. This information helps enhance our website's design, functionality, and optimizing our marketing efforts.

CCR currently uses the following types of cookies on our website:

- **Strictly necessary cookies:** these cookies are essential to allow you to fully use our website and its full features. These cookies do not gather information about you that could be used for marketing. These cookies cannot be turned off as they are essential for enabling the basic functionalities of the website.
- **Analytics cookies:** these cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.

**d. Acting as a service provider**

CCR acts as a service provider when processing audio visual recordings or similar data on behalf of its clients. Clients are responsible for obtaining all required consents from participants or other individuals whose personal information is recorded or processed. CCR processes, stores, retains, and deletes recordings solely in accordance with client instructions or written authorization.

**5. How do we use your personal information?**

CCR may use your personal information for the following purposes or otherwise, with your consent or as permitted or required by law:

- To manage client relationships and business operations;
- To process billing, accounting, and financial obligations;
- To ensure the security and proper functioning of CCR's systems;

- To deliver services and manage records in accordance with client instructions;
- To operate, maintain, and improve CCR's website and services.

## **6. When do we share your personal information?**

### **a. Service providers**

CCR may share personal information with IT or cloud providers (e.g. hosting services), cybersecurity vendors, and professional advisors (e.g. legal and accounting), for the purposes set out in this Policy. These service providers help us operate and manage our website, information systems, infrastructure and marketing.

When CCR shares personal information with our service providers, we ensure by contractual means that the transferred personal information is used only for the purposes for which the service provider is retained and is protected to the same degree as it is when in our possession. Our service providers may be located around the world, as further detailed in the Cross-border transfers of personal information section.

### **b. Other permitted reasons**

CCR may share your personal information when permitted or required by applicable law with governmental authorities, law enforcement and courts when compelled by law.

## **7. What are your privacy choices?**

You have choices about the way CCR handles your personal information.

### **a. Changing your cookie preferences**

When you first visit our website, you are presented with a pop-up banner that allows you to make choices regarding your cookie preferences. By default, only necessary cookies are activated on our website. You can choose to enable or disable some or all of these cookies but disabling some of them may affect your browsing experience.

### **b. Restricting collection, use and disclosure of your personal information**

By providing personal information to CCR through contracts, service agreements, website interactions, or other communications, you consent to the collection, use, and disclosure of your personal information in accordance with this Policy.

You may withdraw your consent to the collection, use and disclosure of personal information in accordance with this Policy at any time upon reasonable notice to CCR in writing, subject to legal or contractual restrictions. To withdraw your consent, please contact us in writing using the relevant contact information listed in the Contact Us section below. Withdrawal of consent may affect CCR's ability to provide certain services.

## **8. How do we protect your personal information?**

CCR maintains appropriate policies and practices aimed at safeguarding your personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used and the format in which it is stored, we implement a combination of measures to protect your personal information, including:

- Endpoint protection
- Access controls
- Monitoring

## **9. How long do we keep your personal information?**

CCR retains personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable law or contractual obligations. When personal information is no longer required, it is securely deleted, destroyed, or anonymized, as appropriate.

## **10. Cross-border transfers of personal information**

CCR is based in Canada and the United States. Some of our service providers may access, process or store your personal information outside of the jurisdiction where we are located and where you reside. As a result, when your personal information is used or stored in a jurisdiction other than where you are residing, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction. CCR takes reasonable steps to ensure that personal information transferred outside its jurisdiction of origin is protected by appropriate safeguards.

## **11. Accessing and rectifying your personal information**

You may be entitled to access your personal information and request the rectification of information that is inaccurate, incomplete or no longer up to date, subject to limited exceptions set out in applicable laws. Depending on the jurisdiction where you reside, you may also be entitled to request the rectification of your personal information if our collection, disclosure or retention of such information is not authorized by law.

To exercise your rights, please contact us in writing using the relevant contact information listed in the Contact Us section below.

## **12. Changes to the Policy**

CCR may make changes to this Policy from time to time at our sole discretion. Any changes we make will be effective when we post the revised Policy on our website. If we make any significant changes to the Policy, we will post a notice on our website or contact you to inform you when required by law. By continuing to interact with us after the modified version of the Policy has been posted, you are accepting the changes to the Policy, subject to any additional requirements that may apply. It is your responsibility to ensure that you read, understand and accept the latest version of the Policy.

### **13. Contacting our Privacy Officer**

If you have any questions, concerns, or requests regarding this Policy or the handling of your personal information, you may contact CCR's Privacy Officer using the details below:

**Attention:** Privacy Officer

**Email:** [info@ccrsolutions.com](mailto:info@ccrsolutions.com)

**Telephone:** 416-675-7502