

## THE WIPESADVISORY PANEL PRIVACY POLICY SCOPE AND APPLICATION

The ten principles that form the basis of this Wipesadvisory Panel Privacy Policy (this “**Privacy Policy**”) are interrelated and Vision Critical Communications Inc. (“**VCCI**”), as the provider of the Wipesadvisory Panel (the “**Insight Community**”) shall adhere to the ten principles as a whole. This Privacy Policy has been drafted to reflect personal information issues specific to the Insight Community as provided by VCCI on behalf of its customer sponsoring the Insight Community (“**Customer**”).

For the purpose of this Privacy Policy, “personal information” means information about an identifiable individual and ‘Customer’ includes Customer’s affiliates and other authorized users of the Insight Community.

The scope and application of this Privacy Policy is as follows:

- it applies to personal information collected, used, or disclosed by VCCI in the course of activities relating to the Insight Community.
- it applies to the management, use and disclosure of personal information in any form whether oral, electronic or written.
- It applies to the Customer’s access to the personal information, indirectly or directly, from the Insight Community through VCCI’s Sparq software platform (the “**Platform**”).

## THE TEN PRINCIPLES OF PRIVACY PRINCIPLE 1 - ACCOUNTABILITY

Responsibility and accountability for VCCI’s compliance with the provisions of this Privacy Policy rests with the VCCI Privacy Officer. The VCCI Privacy Officer can be contacted by e-mail at [privacyofficer@visioncritical.com](mailto:privacyofficer@visioncritical.com), or by mail at:

200 Granville Street, Mezzanine Floor  
Vancouver, BC V6C 1S4

Attention: Privacy Officer

Other individuals within VCCI may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

VCCI is responsible for personal information in its control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party contractor or vendor of VCCI or Customer (a “**Third Party**”). VCCI is not responsible for protection of and does not control personal information that has been disclosed to our Customer.

## PRINCIPLE 2 - IDENTIFYING PURPOSES FOR COLLECTION OF PERSONAL INFORMATION

The personal information VCCI is collecting from the public on behalf of Customer is collected for the following purposes:

- (a) for Customer to conduct quantitative or qualitative marketing and social research;

- (b) for VCCI and Customer to meet legal and regulatory requirements; and
- (c) for VCCI to generate metrics on the performance of the Platform, for system monitoring and developing and improving functionality and creating new functionality within the Platform.

Further reference to "identified purposes" mean the purposes identified in this Principle.

VCCI will provide Customer with all of the information from a survey, including all personal information provided to the Insight Community. VCCI is not responsible for how Customer uses or discloses the personal information.

### **PRINCIPLE 3 - OBTAINING CONSENT FOR COLLECTION, USE OR DISCLOSURE OF PERSONAL INFORMATION**

Your participation in panel research is always voluntary. By agreeing to participate in a panel survey, you are consenting to the collection, use and disclosure of your personal information by VCCI as stated herein.

Any personal information collected in the course of a panel survey for the Insight Community will be disclosed to Customer and may be disclosed to Third Parties. Your agreement to participate in the Insight Community includes your express consent to the terms of this Privacy Policy and the sharing of your information, including any personal information you provide to the [Insight Community with Customer or Third Parties.

You are always free to choose whether to participate in the Insight Community or any panel survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

### **PRINCIPLE 4 - LIMITING COLLECTION OF PERSONAL INFORMATION**

In conducting surveys on behalf of Customer, VCCI's Customer has agreed to limit the amount and type of personal information collected, thereby collecting only the amount and type of information needed for the identified purpose.

### **PRINCIPLE 5 - LIMITING USE, DISCLOSURE, AND RETENTION OF PERSONAL INFORMATION**

VCCI shall not use or disclose your personal information for purposes other than the identified purpose, except with your consent or as required or permitted by law. Personal information shall be retained by VCCI only as long as necessary for the fulfillment of the identified purpose. Customer's use, disclosure, retention is subject to the Customer's privacy policy. VCCI is not responsible for how Customer uses, discloses or retains your personal information.

As noted above, VCCI will disclose your personal information to Customer. As well, VCCI may also disclose your personal information to:

- (a) a Third Party;
- (b) a third party where you have consented to such disclosure upon agreeing to participate in the Insight Community;
- (c) a third party customer directs us to share with;

- (d) a public authority or agent of a public authority if, in the reasonable judgment of VCCI, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; or
- (e) a third party or parties, where disclosure is required or permitted by law.

Only VCCI's employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about respondents while such information is being processed directly by VCCI.

VCCI maintains reasonable and systematic controls, schedules and practices relating to personal information, including policies on the retention and destruction of personal information. When personal information is no longer necessary or relevant for the identified purposes, it shall be destroyed, erased or made anonymous.

#### **PRINCIPLE 6 - ACCURACY OF PERSONAL INFORMATION**

As a respondent, you shall provide accurate, complete, and up-to-date information and VCCI shall update such information upon notification by you.

#### **PRINCIPLE 7 - SECURITY SAFEGUARDS**

VCCI shall protect personal information using security safeguards appropriate to the sensitivity of the information. VCCI shall protect it against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held. VCCI strives to maintain the security of your information however, VCCI cannot guarantee that information security measures are fail-safe, that unauthorized parties will not gain access or guarantee that information will not be disclosed, altered, or destroyed.

VCCI shall be responsible for the protection of personal information disclosed to Third Parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used. VCCI is not responsible for protection of personal information that has been disclosed to our Customer. **You are always free to choose whether or not to participate in the Insight Community or any panel survey, free to choose not to answer any specific questions and free to discontinue participation at any time.**

All of VCCI's employees with access to personal information shall be required to respect the confidentiality of that information.

#### **PRINCIPLE 8 - OPENNESS CONCERNING POLICIES AND PROCEDURES**

Upon request, VCCI shall make readily available to you information about its policies and procedures relating to the management of personal information.

VCCI shall also provide, upon request:

- (a) the title and address of the person or persons accountable for VCCI's compliance with this Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- (b) the means of gaining access to your personal information held by VCCI;

- (c) a description of the type of personal information held by VCCI, including a general account of its use; and
- (d) a description of what personal information is made available to related organizations (e.g. subsidiaries).

#### **PRINCIPLE 9 - INDIVIDUAL ACCESS TO PERSONAL INFORMATION**

Upon written request to the VCCI Privacy Officer, VCCI will:

- (a) inform you of the existence, use, and disclosure of your personal information and shall give you access to the personal information in the possession of VCCI. You can challenge the accuracy and completeness of the information and have it amended as appropriate.
- (b) inform you of the name of Customer, to whom your information has been disclosed. Information that has been disclosed to and is in the possession of Customer shall be governed by Customer's privacy and security policies.

In certain situations, VCCI may not be able to provide access to all the personal information that it holds about you. For example, VCCI may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, VCCI may not provide access to information if disclosure would reveal confidential commercial information.

To safeguard personal information, you may be required to provide sufficient identification information to permit VCCI to account for the existence, use and disclosure of personal information and to authorize access to your file. Any such additional information provided shall be used only for this verification purpose.

VCCI shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in your file. Where appropriate and to the extent practicable, VCCI shall transmit to Customer or Third Parties having access to the personal information in question any amended information or the existence of any unresolved differences.

#### **PRINCIPLE 10 - CHALLENGING COMPLIANCE**

You shall be able to address a challenge concerning compliance with the above principles to the VCCI Privacy Officer.

VCCI shall maintain procedures for addressing and responding to all inquiries or complaints from you regarding VCCI's handling of personal information.

VCCI shall, on written request, inform you about the existence of these procedures as well as the availability of complaint procedures.

The VCCI Privacy Officer may seek external advice where appropriate before providing a final response to individual complaints.

VCCI shall investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, VCCI shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. You shall be informed of the outcome of the investigation regarding your complaint.

## COOKIES

Cookies are small text files placed by a website onto a visitor's web browser or mobile device. When a website page is accessed, a cookie will send information back to the party who placed the cookie such as the last page you visited. Cookies can store information such as unique identifiers, preferences, time and date information, and can also be used to track the pages you visit. Cookies cannot access, read or modify any other data on a computer or mobile device.

Cookies can be session based, which means that they expire automatically when you close your browser, or they can be persistent. Persistent cookies remain even after you close your browser session, but will include an expiry date, after which they are no longer useable.

Cookies can also be set by more than one party. Cookies that are set and controlled directly by the website you are visiting are called 'first party cookies', and these cookies will display the domain of the website that you are visiting. Cookies that are set by third parties are known as 'third party cookies' and are typically not set or controlled by the website you are visiting, even though they are placed on your device during a visit to that website. These third-party cookies will display the domain of the third party's website, and the data they collect is sent back to the third party's servers. This website sets both first and third party cookies, which can be session based or persistent depending on their use. Most of these cookies are set using VCCI's proprietary survey and community platform.

The Insight Community website uses cookies for several useful purposes such as facilitating authentication, remembering your preferences, and maintaining sessions. Cookies also enable VCCI and our service providers to analyze website usage such as pages you've visited to improve the functionality of the website.

This website uses Google Analytics, a popular website analytics service provided by Google Inc. to measure how you interact with content and to keep track of the pages you have viewed. The cookie set by Google Analytics uses an anonymous identifier to recognize your visit and does not collect any of your personal information.

Every major web browser provides the option to refuse any cookie and you may also delete a cookie manually from your device. To block tracking by the Google Analytics cookie, please visit <https://tools.google.com/dlpage/gaoptout>. Note that refusal or deletion of cookies may result in some site features to not function correctly or at all.

More information about your choices regarding cookies can be found at <http://www.allaboutcookies.org>.

## ADDITIONAL INFORMATION

For more information regarding the Privacy Policy, please contact the VCCI Privacy Officer by e-mail at [privacyofficer@visioncritical.com](mailto:privacyofficer@visioncritical.com), or by mail at:

200 Granville Street, Mezzanine Floor  
Vancouver, BC V6C 1S4  
Attention: Privacy Officer

## CHANGES TO THIS PRIVACY POLICY

VCCI may change the terms of this Privacy Policy at any time so please review it periodically.