

PRIVACY POLICY

mPloy Solutions Inc.

Last Updated: June 18, 2020

1. Overview

Welcome to the mPloy Solutions Inc. (“**mPloy**”, “**we**” or “**us**”) Privacy Policy (the “**Privacy Policy**”). This Privacy Policy explains how we collect, use, disclose and retain Personal Information through your use of our website located at www.mploy.ca and our mobile-based platform (the “**MP**”) (collectively, the “**Services**”). This Privacy Policy forms a part of the mPloy general terms of service located at <https://mploy.ca/terms-of-service/> (the “**Terms of Service**”) (collectively, the “**Agreement**”). In the event of conflict between this Privacy Policy and the Terms of Service, this Privacy Policy will apply.

BY ACCESSING AND USING THE SERVICES YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, DO NOT USE THE SERVICES. WE RESERVE THE RIGHT TO CHANGE THIS PRIVACY POLICY FROM TIME TO TIME. BY CONTINUING TO ACCESS AND/OR USE THE SERVICES AFTER SUCH CHANGES ARE POSTED, YOU AGREE TO SUCH CHANGES.

2. Application

In this Privacy Policy, “**Personal Information**” means information about an identifiable individual that either by itself or when combined with other information is reasonably capable of identifying the individual (e.g., name, address, gender, driver’s license number, images, employment history, etc.).

This Privacy Policy does not apply to aggregated information, which is any information about more than one individual where the identity of the individuals is not known and cannot be inferred from the information. mPloy reserves the right to use such information in any way that it reasonably determines is appropriate.

3. Collection and Use of Personal Information

(a) Purpose. We may collect and use Personal Information that is necessary to fulfill the following purposes (the “**Purposes**”):

- to enable you to access and use our Services;
- to improve and optimize our Services;
- to communicate with you, including but not limited to, contacting you about system maintenance, feature updates, security alerts, notifications, and other informational and customer service-related communications;
- to personalize and customize your experience in using the Services;
- to detect, prevent, and investigate fraudulent or illegal activities;



- to verify or authenticate information or identifications provided by you, including but not limited to, conducting checks against databases and other third-party sources (e.g., reference checks, credit checks, employment verification, education verification and criminal record checks);
- to permit us to pursue available remedies, resolve disputes or protect against any damages that we may sustain;
- to permit us and other users of the Services who post jobs and/or event shift openings on the MP (the “**Clients**”) to evaluate your profile, recommend you, and/or attempt to match you with such openings, as may be applicable;
- to permit us to collect reviews on your profile from other users of the Services, including users who have found work or are looking for work (the “**Worker Pros**”), in order to aid in evaluating your suitability for jobs and/or event shift openings on the MP;
- for internal statistical and operational purposes, including but not limited to, measuring usage statistics and understanding trends among our users;
- for advertising, marketing and promotional purposes;
- for any purpose which is permitted or required by applicable law; and
- for any other purpose which is disclosed to you and to which you consent.

(b) General Collection. We may collect, process, and retain Personal Information from you and your mobile devices, when you: (i) register to use the Services; (ii) update or add information to your account; (iii) engage or communicate with us, other users or third parties in connection with the Services (including but not limited to telephone conversations and video interviews during onboarding with mPloy); (iv) participate in dispute resolution; or (v) otherwise access, use or download any part or whole of the Services. Such Personal Information may include:

- information such as your name, age, address, driver’s license, telephone number and email address;
- information as to whether: (i) you are a student; (ii) English is your first language; (iii) you are legally entitled to work in Canada; and (iv) you have previously filed a tax return in Canada;
- headshot images of yourself and video interview recordings;
- mobile phone location using GPS and similar technologies, and information relating to the performance of the Services you experience;
- the content of your communications via the Services, including any information you provide through dispute resolution; and
- any other information that you voluntarily choose to provide to us, or authorize us to collect, or which we are permitted to collect pursuant to applicable law.



- (c) Automatic Collection. Through your use of the Services, we may automatically collect information about how you use the Services, as well as information about your computer or mobile device, such as your Internet protocol (IP) address, device ID, physical location, browser and operating system type, resolution of your screen, language settings in your browser, referring URLs, and other technical information. This information is necessary for providing personalized and location-based content and services, as well as for analyzing web traffic, troubleshooting problems, preventing fraud, and improving the Services.
- (d) Cookies. We may use cookies, pixel tags, web beacons, or other similar tools on our Services or in our communications with you to help personalize and maximize your experience in using the Services. We may also engage one or more third party service providers to provide online advertisements on our behalf. We may use, or authorize the use of cookies, pixel tags, web beacons or other similar technology to collect information about your visits to the Services, and we may use that information to send you targeted advertisements.

If you do not wish to accept cookies, you have the option of blocking or disabling cookies. Your computer provides you with the ability to clear all cookies that have been stored onto your hard drive, should you wish to do so. However, please be aware that you may be unable to access certain parts of the Services if you block or disable our cookies. For more information about cookies, visit: <https://www.allaboutcookies.org/>.

- (e) Third Party Data. We may obtain Personal Information from third parties (e.g., for reference checks, ID verification, credit checks, employment verification, education verification, and criminal record checks). We protect Personal Information obtained from third parties according to the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the information and applicable laws.
- (f) Feedback. Any suggestions or comments for improving or modifying the Services that are included in your communications with us (“**Feedback**”) will be deemed to be non-confidential and non-proprietary to you, and you agree that: (i) mPloy is therefore not subject to any confidentiality obligations with respect to the Feedback; (ii) the Feedback is not confidential or proprietary information of any third party and you have all of the necessary rights to disclose the Feedback to us; (iii) mPloy may irrevocably freely use, reproduce, publicize the Feedback; and (iv) you are not, nor is any other party, entitled to receive any compensation or reimbursement of any kind from us in relation to the Feedback.

4. Consent

mPloy will not collect, use or disclose Personal Information without your consent, unless we are permitted or required to do so by applicable law. Consent may be express or implied. Express consent occurs when an individual knows what Personal Information is being collected and for what purposes, and such individual willingly agrees (e.g., orally, in writing, electronically) to his or her Personal Information being collected, used and disclosed as notified. Consent may be implied when: (a) the individual does not expressly give consent, but rather volunteers Personal Information for obvious purposes that a reasonable person would consider appropriate in the circumstances; or (b) the individual is given notice and a reasonable opportunity to opt-out of his or her Personal Information being collected, used and/or disclosed for specified purposes, and the individual does not opt-out.

By providing Personal Information to mPloy, you consent to our collection, use, disclosure and retention of your Personal Information under the terms of this Privacy Policy. If you do not agree with these terms: (a) do not provide any Personal Information to us; and (b) contact us to withdraw your consent if you have already provided us with any Personal Information.



You may withdraw your consent for the collection, use and disclosure of your Personal Information at any time. However, this may prevent you from accessing and using the Services. If you wish to withdraw your consent, please contact us. If you continue to use the Services thereafter, your consent to this Privacy Policy is deemed unconditionally renewed.

5. Disclosure of Personal Information

- (a) General. We may disclose your Personal Information to third parties for the Purposes outlined in Section 3(a). We will not disclose Personal Information for any additional purpose unless permitted or required by applicable law, or we obtain your consent to do. We minimize the amount of Personal Information disclosed to what is directly relevant and necessary to accomplish the specified purpose.
- (b) Other Users. Your Personal Information will be disclosed to Clients to collect reviews on your profile and to evaluate and match you with jobs and/or event shift openings. mPloy may also disclose your Personal Information to Worker Pros in order to collect reviews and aid in evaluating your suitability for jobs and/or event shift openings. We take reasonable measures to ensure that the rules set forth in this Privacy Policy are complied with and these users provide contractual guarantees to implement appropriate technical and organizational measures in accordance with applicable law.
- (c) Service Providers. We may provide your Personal Information to third parties that provide services to help us with our business activities and the provision of the Services. For example, we may use third party service providers to help us analyze interview videos, analyze usage of our Services, conduct background checks (e.g., reference checks, ID verification, credit checks, employment verification, education verification, criminal record checks), provide personalized advertising, track the effectiveness of our marketing campaigns, strategies and communications, provide payment processing services, assist with the prevention, detection, mitigation and investigation of potentially illegal acts, violations of our Agreement (which incorporates this Privacy Policy), fraud and/or security breaches, collect and process error and crash reports, host web servers and store data. These third parties are authorized to use your Personal Information only as necessary to provide these services to us. We take reasonable measures to ensure that the rules set forth in this Privacy Policy are complied with and these third parties provide contractual guarantees to implement appropriate technical and organizational measures in accordance with applicable law.
- (d) Reorganization. We may also disclose or transfer your Personal Information to an affiliate or a third party in the event of a proposed reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of mPloy's business, assets or equity, including, without limitation, in connection with any bankruptcy or similar proceeding. In connection with the foregoing, your consent to the Agreement (which incorporates this Privacy Policy) is deemed transferable to the benefit of mPloy and its assigns, without notice to you.
- (e) Legal Disclosure. mPloy may also disclose Personal Information about you to others as we believe to be necessary or appropriate: (i) under applicable laws and regulations; (ii) to comply with legal process and/or respond to legal claims; (iii) to respond to requests from public authorities and law enforcement officials; (iv) to assist or support investigations involving our Services; (v) to enforce the Agreement (which incorporates this Privacy Policy); (vi) to protect the rights, privacy, or safety of mPloy, its affiliates, yourself and others; or (vii) to permit us to pursue available remedies or limit the damages that we may sustain.



- (f) International Transfer and Storage. Your Personal Information may cross international borders in order to facilitate the Services. In some cases, your Personal Information may be disclosed, processed, and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable there.

6. Retention of Personal Information

mPloy retains Personal Information for as long as necessary to provide the Services, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing the Agreement. Based on this, actual retention periods will vary. After it is no longer necessary for us to retain your Personal Information, we dispose of it in a secure manner according to our data retention and deletion policies. We are not responsible for any liability or loss you experience as a result of our disposal of Personal Information.

7. Security of Personal Information

We protect your Personal Information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. mPloy follows generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you believe your account has been abused, please contact us immediately.

8. Changes to Personal Information

We take reasonable steps to help ensure that the Personal Information we collect from you is accurate, complete and current. You may request access to your Personal Information and request that erroneous or inaccurate Personal Information be updated.

9. Third Party Links and Policies

If you disclose your Personal Information to others, or if you engage any third-party sites or services, such third-party's privacy notices and practices will apply. We cannot guarantee the privacy or security of your Personal Information once you provide it to a third party and we encourage you to evaluate the privacy and security policies of each such third-party before any such engagement or disclosure.

The Services may contain links to third party websites or applications that are not owned, maintained or operated by mPloy. Any such links are provided solely as a convenience to you and not as an endorsement by us. mPloy is not responsible for the content of such linked third-party websites or applications and does not make any representations, warranties or guarantees regarding the content or the privacy practices of such third parties. For certainty, mPloy disclaims any liability associated with your access to, use of, download of, or reliance on, such third-party websites or applications and their content. If you decide to access, use or download any such third-party website, application or content, you do so at your sole risk.

10. Marketing & Advertising

Unless you expressly opt-out, your access and use of the Services will be deemed as your consent to receive marketing communications from us via email or any other form of communication you have provided us contact information for. You may opt-out at any time by clicking "Unsubscribe" in any such communication (as applicable) or by contacting us.



11. Children

By accessing and using the Services, you represent that you are at least nineteen (19) years of age or that you have parental/guardian consent to use the Services. If you are a parent or legal guardian and you discover that your child under nineteen (19) years of age has provided Personal Information without your consent, then you may alert us via the contact methods below and request that we delete your child's Personal Information from our systems.

12. Contact Us

If you have any questions about mPloy's Privacy Policy, contact our Privacy Officer at:

Mail: mPloy Solutions Inc., PO Box 91879, West Vancouver, BC V7V 4S4

Email: unsubscribe@mploy.ca

