

CrossSafety Holdings Inc. and its subsidiaries and affiliates, including the TRH Group and REA Group companies in Canada, USA and Mexico, ("CrossSafety" or "we", as further disclosed here: <https://www.crosssafety.ca/corporate>), are committed to maintaining the accuracy, security and privacy of Personal Information in accordance with applicable legislation. This CrossSafety Privacy Policy is a statement of principles and guidelines concerning the protection of Personal Information of our clients, service providers and other individuals ("you") and applies to all CrossSafety companies.

## Consent

By submitting personal information to CrossSafety or its service providers and agents, you consent to our collection, use and disclosure of such personal information as set out in this Privacy Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting us at [privacy@crosssafety.ca](mailto:privacy@crosssafety.ca). If you refuse or withdraw your consent, we may not be able to provide you, or continue to provide you, with certain services or information which may be of value to you. If you provide CrossSafety or our service providers and agents with personal information of another individual, you represent that you have all necessary authority and or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

## What Personal Information Do We Collect?

For the purposes of this Privacy Policy, Personal Information means information about an identifiable individual as defined from time to time in applicable privacy legislation. Personal Information does not include what is considered business contact information, such as your name, title or position, business address, telephone number, facsimile number or e-mail address. In certain circumstances, or to provide certain services, CrossSafety may collect your name, home address, telephone number, personal e-mail address, billing and account information, and other information incidental to providing services.

We also collect from former employers and other third parties, and from publicly available sources, personal information about prospective or current employees, contractors and vendors required to establish, manage, or terminate an employment, contractual or business relationship.

## Why Do We Collect Your Personal Information?

In general, CrossSafety collects, uses and discloses Personal Information about our clients, service providers and employees, for purposes such as: determining whether to establish a commercial relationship (including to evaluate creditworthiness, security and reliability); providing clients with services; marketing and selling our services and products; distributing informational communications; developing and managing our business; collecting and processing payments; assessing applicants for positions with CrossSafety; managing or terminating an employment, contractual or business relationship; to detect and protect ourselves and other third parties against error, negligence, breach of contract, fraud, theft and other illegal activity; to audit compliance with CrossSafety policies and contractual obligations; to comply with any legal or regulatory requirements or provisions; and for any other purpose to which you consent.

## To Whom Do We Disclose Your Personal Information?

From time to time, CrossSafety may disclose your Personal Information to: service providers, including an organization or individual retained by CrossSafety to perform functions on its behalf, such as marketing, data processing, document management and office services; an organization or individual retained by CrossSafety to evaluate your creditworthiness or to collect debts outstanding on an account; a financial institution, on a confidential basis and solely in connection with the assignment of a right to receive payment, the provision of security or other financing arrangements; or a person who, in the reasonable judgment of CrossSafety, is providing or seeking the information as your agent; to our insurers and to regulatory agencies or others in connection with regulatory or other activities relating to the obligations of CrossSafety and its services; to personnel in CrossSafety, government authorities, insurers, benefits providers, consultants or agents as reasonably required to establish, manage or terminate employment, contractual and business relationships; and any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

## Where Do We Store Your Personal Information?

Your Personal Information is stored in secure locations and on servers controlled by CrossSafety, located either at our offices or at the offices of our service providers.

## How May You Obtain Access to Your Personal Information?

Upon your written request, subject to certain exceptions, CrossSafety will inform you of the existence, use and disclosure of your Personal Information and will give you access to that information. Access requests should be sent to [privacy@crosssafety.ca](mailto:privacy@crosssafety.ca). Your personal information may be shared, stored or accessed in Canada, the United States, the United Kingdom, the European Economic Area, Mexico, and other

jurisdictions or countries. Your information may be disclosed in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those jurisdictions or countries.

## How Do We Protect Your Personal Information?

To help protect the confidentiality of your Personal Information, CrossSafety employs administrative and technological safeguards appropriate to the sensitivity of your Personal Information. Where Personal Information is sent to a third party for processing we ensure, through our contacts with them, that all Personal Information is kept secure. We operate secure data networks protected by industry standard firewall and password protection systems.

## Privacy and Our Website

Cookies – When an individual visitor accesses the CrossSafety website, we may use a browser feature called a “cookie” to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor, to our computers each time our website is visited. Unless a visitor specifically informs us (e.g., by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.

Online Communications – In order to provide our website visitors with a service or information, visitors may voluntarily submit Personal Information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, subscribing to a newsletter or a mail or e-mail list, participating in a seminar or other event, and participating in contests and surveys. If you are known to CrossSafety as a registered user of an online service, we may combine and store Personal Information about your use of our website and the online information you have provided with certain other online and offline information we may have collected.

E-mail Communications – Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the services of CrossSafety and other third parties with whom we have a relationship. In this process, we may collect certain information such as the date/time you first opened our e-mail communications, the number of times you open our e-mail communications, the number of click-throughs per article, total click-through activity on the contents of our e-mail communications and compile the related statistics. We may combine and store any such information to manage and improve our e-mail communications to you. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from CrossSafety.

Links – Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third-party websites may have different privacy policies and practices than CrossSafety, and CrossSafety has no responsibility for such third-party websites.

## European Union Privacy Rights

If you are in the European Union, under the General Data Protection Regulation (Regulation EU 2016/679) (also known as GDPR), you may have certain rights as a data subject. A data subject is a person who can be identified by a name, identification number, location, online identifier, or other physical, physiological, genetic, mental, economic, cultural or social identity of the person. Under the GDPR, personal data is information that relates to a data subject. The processing of your data is either based on your consent or in case the processing is necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering a contract, cf. GDPR art. 6(1)(a)-(b). Under the GDPR, our lawful bases for processing personal data will be, according to circumstances: consent, contract, legal obligation, and/or legitimate interests. If the processing is based on your consent, you may at any time withdraw your consent by contacting us at [privacy@crosssafety.ca](mailto:privacy@crosssafety.ca).

## California Privacy Rights

If you are a California resident and have an established business relationship with us and want to receive information about how to exercise your third-party disclosure choices, you must send a request to [privacy@crosssafety.ca](mailto:privacy@crosssafety.ca) or to our registered office address with a preference on how our response to your request should be sent (email or postal mail).

For requests sent via email, you must put the statement “Your California Privacy Rights” in the subject field of your email. All requests sent via postal mail must be labeled “Your California Privacy Rights” on the envelope or post card and clearly stated on the actual request. For all

requests, please include your name, street address, city, state, and zip code. (Your street address is optional if you wish to receive a response to your request via email. Please include your zip code for our own recordkeeping.) We are not responsible for responding to notices that are not labeled or not sent properly, or do not have complete information.

#### **The Data Controller and Processor for Personal Data**

A Data Controller is a company that collects people's personal data and makes decisions about what to do with it. A Data Processor is a person or company that deals with personal data as instructed by a Data Controller for specific purposes and services. The Data Controller's information is: CrossSafety Holdings Inc., 18 Wynford Drive, Suite 617, Toronto, Ontario M3C 3S2, [privacy@crosssafety.ca](mailto:privacy@crosssafety.ca), 888-732-4347. The Data Processors are: Constant Contact, Reservoir Place, 1601 Trapelo Road, Waltham, MA 02451, USA; and SurveyMonkey, 1 Curiosity Way, San Mateo, CA 94403, USA.

#### **Changes to the Privacy Policy**

CrossSafety reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website. CrossSafety will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your Personal Information for purposes other than those to which consent has been obtained unless otherwise required or permitted by law.