



Privacy Policy

Last Updated: 10-03-2022

Dye & Durham Corporation is a leading provider of cloud-based software and technology solutions designed to improve efficiency and increase productivity for legal and business professionals. As such, we only process personal information in the context of providing our services, operating our website or receiving job applications.

For the purposes of this privacy policy, any reference to Dye & Durham includes any of the present and future subsidiaries and affiliates of Dye & Durham Corporation. As such, when we mention “Dye & Durham”, “we”, “us” or “our” in this document, we are referring to the relevant company within the affiliated group responsible for processing data.

We are committed to providing you with exceptional service while protecting privacy and safeguarding personal information. This Privacy Policy tells you how.

- **What personal information do we process?**
Personal information means information or an opinion that relates to an identifiable individual whether the information is true or not. We process it through our website, through the provision of our services and through job applications assessment.
- **From our website:**
Like most websites, this website and our third-party providers set and use cookies to manage user preferences, enable content, gather analytic and usage data, and improve your user experience.
- **Through the provision of our services**
We require some personal information to provide our services, meaning, when you order products or services from us. We also process your personal information when you have signed up to receive our newsletter or to communicate with you as part of our business relationship. In that context, we only process personal information you provide.

This is the personal information we process in providing our services:

What type of information	What it includes	From who
Account Data	Name, email, telephone, business address, username for the online platform	Client and Supplier or other persons granted view-only access to the online platform which could include a Prospect
Billing Data	Billing address	Client
Financial Data	Bank account and payment card details	Client

What type of information	What it includes	From who
Customer Data	Including name, maiden name, address, purchase address, date of birth, gender, previous addresses, passport or driving licence details, national insurance number	Customers and Prospective Customers. Where you enter this information through an Integration, the third-party supplier's privacy notice will apply.
Transaction Data	Details about payments to and from you and other details of products and services you have purchased from us or we have purchased from you	Customer and Supplier
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites	Customer, Supplier or Prospect using our websites
Profile Data	Username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses	Customer or Prospect
Usage Data	Information about how you use our websites, and the products and services you order	Customer
Marketing and Communications Data	Includes any preferences in receiving marketing from us and our External Third Parties, and your communication preferences, Identity Data	Customer, Prospect or Supplier

- **Through job applications** When you contact us to inquire about or to apply for a position with us, we will need some information to assess your application and to meet certain legal obligations. The personal information you provide is part of the recruitment process and may include:
 - Contact information;

- Details of your education, qualifications and skills in you curriculum vitae (CV) as submitted through your application;
- Information processed from third parties, including previous employers and educational institutions.
- Information about your employment history and compensation; You may choose to provide information about a disability to request accommodations during the recruitment process. As applicable, immigration information may be required to establish legal ability to work in a specific country. We may administer tests or other forms of assessments administered during the recruitment process; All the information is provided by you, in the course of the recruitment process and by third parties you may designate as references and recruitment agents. The information is used to:
 - assess your application in relation to the position offered.
 - contact you during the recruitment process.
 In addition to the safeguards we apply to all personal information we process, as mentioned in section 5, we protect the information by:
 - limiting access to the information on a need-to-know basis, meaning members of the human resources and recruitment teams, interviewers or other service providers involved in the recruitment process, personnel in the business area that is hiring and information technology (IT) staff who support our systems;
 - retaining your information for only two months, providing you the opportunity to inquire about the process but destroying it at the end of that period; where we assess that your application may be relevant to future employment opportunities, we will ask your permission to retain the information for two years; you can withdraw that consent at any time. If you are hired, your application information becomes part of your personnel file. You can exercise your privacy rights as described in section 7.

1. Why do we process personal information?

We will only process personal information to operate our website, provide our services or process job applications.

These are the specific purposes for which we process personal information.

Purpose/Activity	Type of personal information	Our lawful basis for processing
To register you as a Client including user of an online platform or Integration	<ul style="list-style-type: none"> • Account Data • Billing Data • Financial Data 	Performance of a contract with you
To process and deliver your order including:	(a) <ul style="list-style-type: none"> • Financial Transaction • Marketing 	Performance of a contract with you/Necessary for our legitimate interests (to recover debts due to us)

<p>(a) Manage payments, fees and charges (b) Collect and recover money owed to us</p>	<p>and Communications</p>	
<p>To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notices (b) Letting you know about any website service issues (c) Communicating with you to deliver services or report back on provision of those services (d) Asking you to leave a review or take a survey</p>	<p>(a) Account • Marketing and Communications</p>	<p>Performance of a contract with you / Necessary to comply with a legal obligation / Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our websites and ordering platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting, Integrations and hosting of data)</p>	<p>(a) Account • Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) / Necessary to comply with a legal obligation.</p>
<p>To use data analytics to improve our websites, ordering platforms, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical • Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Account • Technical • Usage • Profile • Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

2. Who do we share personal information with?

We may share personal information with our service providers and exclusively to support us in providing our services. All are subject to contractual clauses where they provide sufficient guarantees to implement appropriate technical and organisational measures to meet our own privacy law requirements and we reserve the right to verify their compliance. These providers may include providers of marketing tools; insurance policies, as well as professional advisers such as lawyers and accountants.

Personal information may also be transferred to an organization to whom we may choose to sell or merge parts of our business. In those cases, we ensure that the personal information always remains protected at the same level prior to the merger or acquisition.

In exceptional cases, we may have to disclose personal information as required by law, but only with demonstration of lawful authority to access it.

3. Where do we store personal information?

We generally store personal information in the country where it is processed. If we need to transfer personal information across borders, for example, to provide our services, we do so in accordance with the applicable law. This means we apply the legally required contractual clauses as prescribed by applicable privacy law or we refrain from transferring across borders where the applicable law prohibits it.

4. How do we keep personal information secure?

We have put in place physical safeguards, such as entry-exit controls in our office, technological safeguards, such as firewalls and access controls to our electronic systems and organisational safeguards such as limiting access on the basis of need-to-know, to protect the personal information we process.

5. How long do we retain personal information?

We will only retain personal information for as long as we need it for the specific purpose for which we process it or as required by law. Specifically,

- We keep basic information as well as financial and transaction information about our Clients for the duration of the relationship with the Client and as long as required by local tax law after the end of that relationship.
- We keep records of the details provided in anti-money laundering searches as required by applicable local law.
- We keep records of addresses relating to search reports for the duration of the relationship with the Client and for seven years after the end of that relationship so that we can provide a history of searches to Clients and to investigate any claim, as the case may be.
- We also generally keep the information that is required to provide services for the duration of the relationship with the Client and for seven years after the end of that relationship unless a legal claim arises and we have to preserve the personal information until the claim is resolved.
- For people who have requested us to remove them from the marketing database we keep the record of their request indefinitely to ensure we fulfil their request.

- In some circumstances we may anonymise personal information, meaning it can no longer be associated with an identifiable individual, for research or statistical purposes. In that case, we may use this information indefinitely since it no longer constitutes personal information.

6. Your privacy rights

You have rights over your personal information and this is how we respect them:

- You can request access to your personal information, in writing and with proof of identity, for your own security. We will provide you access within 30 days unless we are prohibited to do so. For example, we cannot provide you access where doing so would disclose personal information about another individual. If we cannot provide you access, we will provide reasons.
- You can also request correction of your personal information as necessary and after we have verified accuracy of the new information.
- You can request erasure of the personal information we process about you if it is no longer necessary for the purposes for which we process it. As mentioned in section 6, we do not retain your information beyond what is necessary, at any rate.
- You can object to us processing certain information about you and, if it is not necessary to provide you our services, or to review your job application, we will delete it. For example, you may object to our processing of your personal information for direct marketing. In that case, we will make sure your personal information is removed from our direct marketing lists.
- You can also request restriction of processing of your personal information, This means you can request that we limit the processing to certain purposes corresponding to the limited service you want to receive.
- You can request us to transfer the personal information you have provided us to a third party, in a structured, commonly used, machine-readable format.
- Where you provide us personal information with consent rather, for example, than as required by law, you can withdraw consent at any time. In particular, you can unsubscribe to all our marketing emails by simply clicking “Unsubscribe” in the email. Of course, we may not be able to provide you the services that require that information you have requested that require that information to be delivered. We will advise you if this is the case at the time you withdraw your consent.

To exercise these rights, please contact our Privacy Officer at privacy.officer@dyedurham.com

If you still have concerns about the processing of your personal information, you have the right to lodge a complaint with the privacy or data protection authority of your country.

7. Other Sites

Our web site may contain links to other third party sites that are not governed by this privacy policy. Although we endeavour to link only to sites with high privacy standards, our Privacy Policy will no longer apply once you leave one of our websites. We are not responsible for privacy policies employed by third parties. We suggest, therefore, that you examine the privacy statements of those sites to learn how personal information may be processed, used and/or disclosed. Our websites may

process 'cookies' to facilitate your visit to our sites. 'Cookies' contain no information about you but rather are unique numbers used to track user activity at a website. You can set your browser to reject or accept cookies.

8. Contact Information

If you have any questions about this privacy policy or your personal information, please contact our Privacy Officer by mail or email at:

Dye & Durham Corporation
199 Bay Street, Suite 4610
Toronto, ON, Canada
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