

## PRIVACY POLICY

*Last updated: October 30, 2017*

### **1. Our Commitment to Privacy**

LlamaLink is committed to controlling the collection, use and disclosure of the personal information provided by visitors to LlamaLink's Website located at LlamaLink.ca.

LlamaLink's Privacy Policy is modeled after the Canadian Standards Association Model Code for the Protection of Personal Information and is compliant with federal and provincial privacy laws including the *Personal Information Protection and Electronic Documents Act* (Canada). A summary of the ten principles of fair information practices adopted in our Privacy Policy is included at the end of the policy.

LlamaLink may periodically update this policy. LlamaLink's Users will be notified of any significant changes by email correspondence to their primary email address or by placing a prominent notice on LlamaLink's website.

### **2. What is Personal Information?**

"Personal information" is personally identifiable information such as a name, a company name, and address, an e-mail addresses, and also includes recorded feedback and comments.

Personal information is collected by LlamaLink only when Users specifically and knowingly choose to provide it LlamaLink, such as when a user is approved as a User of the LlamaLink.ca Website. LlamaLink may also receive personal information from our business partners and other third parties provided that such third parties confirm to us that they have obtained your consent to the disclosure of your personal information. Publicly available information, such as a public directory listing of your name, your company name, address, telephone number and email address, is not considered personal information.

### **3. Collection and Use of Personal Information**

LlamaLink collects and uses personal information primarily for the purpose of providing you with the services available on LlamaLink.ca. Your personal information is used to communicate with respect to your agreement to use LlamaLink, and to provide you with information related to LlamaLink's other services.

LlamaLink may also contact its Users from time to time to conduct customer satisfaction surveys in an effort to continually improve our service offerings. Unless our Users specifically authorize us to release their personal information, or release is required or permitted by law, LlamaLink will not sell, lease or trade our client's personal information to other third parties.

Anonymous or "non-personal" information gathered by LlamaLink through our Websites may be used for technical, research and analytical purposes. Information collected (through surveys, existing files and

public archives) may be used by LlamaLink to analyze LlamaLink's markets and to develop or enhance service offerings.

LlamaLink will only ask for information regarding our Users that we need and will only ask for it when we need it. When we ask you for the information, we will provide an explanation as to why we need it and what we are going to do with it.

We will seek your prior consent to the collection, use and disclosure of your personal information as required by applicable privacy legislation. Subject to legal and contractual requirements, you can refuse to consent to our collection, use or disclosure of information about them. You may also withdraw their consent to any further collection, use or disclosure of your personal information at any time by giving us reasonable notice. If our intended disclosures or uses of information change, we will notify our Users accordingly.

#### **4. Disclosure**

To enable us to more efficiently provide the services that our Users have requested from us, LlamaLink may share their personal information with selected third parties who are acting on our behalf as our agents, suppliers or service providers. Such third party service providers are provided only with such information as is necessary in the circumstances. Information provided to third parties may be used only for the purpose stipulated and is subject to strict terms of confidentiality.

#### **5. Use of Cookies**

LlamaLink uses a browser feature called a cookie to maintain current session information. A cookie is a small text file that is placed on your hard disk by a web site. "Cookies" contain a unique identification number that identifies your browser, but not you, to our computers each time you visit one of our web sites.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you will not be able to use some or all of the features available on our Websites.

#### **6. Accuracy**

LlamaLink makes no representation or warranty regarding the accuracy or completeness of information about its Users. If we have disclosed any inaccurate information about one of our Users to a third party, we will be pleased to contact the third party in order to correct the information.

#### **7. Access**

If you have any questions about the collection, use or disclosure of your company's personal information you may contact us by sending an email at [info@llamalink.ca](mailto:info@llamalink.ca).

LlamaLink reserves the right to refuse access to information about you in circumstances permitted or required by applicable privacy legislation. If LlamaLink refuses access to you, it will provide you with the

reasons for its refusal upon request. Exceptions may include information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege. LlamaLink will respond to your requests for access in accordance with applicable privacy legislation.

## **8. Questions or Concerns**

If you have any questions or concerns about your personal information held by LlamaLink or about the compliance by LlamaLink with this Privacy Policy, please contact us at [admin@llamalink.ca](mailto:admin@llamalink.ca).

If you are not satisfied with the response from us after making a complaint, you may have recourse to additional remedies under applicable privacy legislation. For further information, please contact your provincial Privacy Commissioner.

## **9. Ten Principles of Fair Information Practices**

### **1) Accountability**

LlamaLink is responsible for the personal information under its control and shall designate one or more individuals who shall be accountable for the company's compliance with the procedures and principles set out in our Privacy Policy.

### **2) Identifying Purposes**

LlamaLink will identify the purposes for collecting information at or before the time of collection. This will enable us to determine which information needs to be collected in order to meet our needs. The purposes for which information is collected, used or disclosed by HireQ must be those that a reasonable person would consider are appropriate in the circumstances.

### **3) Consent**

Where it is appropriate, an individual must have knowledge of and give consent to the collection, use or disclosure of personal information, except where consent is not required by privacy legislation as, for example, where the collection, use or disclosure of personal information is solely for journalistic, artistic or literary purposes.

### **4) Limiting Collection**

Personal information should only be collected as necessary for the purposes that LlamaLink has identified. Personal information should be collected by fair and lawful means.

### **5) Limiting Use, Disclosure and Retention**

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of the purposes for which it was collected.

### **6) Accuracy**

In order to meet the intended purposes, personal information should be accurate, complete and up-to-date. This principle aims to minimize the possibility that incorrect information is used to make a decision about an individual. This also applies to information disclosed to third parties.



7) Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8) Openness

LlamaLink shall make readily available to its customers and employees specific information about its policies and practices relating to the management of personal information.

9) Individual Access

Individuals should be informed of the existence, use and disclosure of their personal information. Individuals will have access to their personal information and be able to question and correct the accuracy and completeness of this information.

10) Challenging Compliance

A User shall be able to address a challenge concerning compliance with the principles in our Privacy Policy to his or her designated Privacy Compliance Officer.