

THOUGHTWIRE PRIVACY POLICY

ThoughtWire takes the privacy of personal information seriously, including personal information we process on our customer's behalf, and we have prepared this Privacy Policy to describe the manner in which we treat personal information.

ThoughtWire provides services ("**Services**") to its customers in connection with its proprietary system (the "**ThoughtWire Platform**"). This Privacy Policy applies to personal information we process in the course of providing the ThoughtWire Platform and Services on behalf of our customers, as well as the personal information we collect, such as through our website, www.thoughtwire.com (the "Website").

I. How Information is Collected and Used by ThoughtWire

Information We Process on Behalf of Our Customers:

In the course of providing the ThoughtWire Platform and Services to our customers, we may obtain personal information about our customers' employees or other users authorized to access and use the ThoughtWire Platform (collectively, the "Authorized Users") as set out below:

- **Information required to provide the Services:** We collect information that our customers or Authorized Users upload to the ThoughtWire Platform or otherwise provide to us through the Services. Depending on the customer, this information may contain personal information or personal health information. An app user's location information may be collected in the background while the user is in a Customer building where the ThoughtWire Services are provided. Location information will enable the ThoughtWire Services to determine whether a user has been impacted by a workplace incident and send notifications to those who have been affected. We receive and maintain this information as a service provider on behalf of our customers in order to provide the Services, and we do not use such information for any other purpose except as set out herein or as otherwise required or permitted by applicable law. We rely on our customers to ensure that they have obtained all necessary authority and consent to provide personal information to us and to comply with applicable privacy laws when collecting, using or disclosing personal information in connection with the Services.
- **Information required for account creation and billing purposes:** We collect business contact information (such as first and last name, work email address, phone number, and job title) of our customers and other Authorized Users of the Service in order to create and administer an Authorized User account, invoice customers and resolve billing inquiries.
- **Information required to provide maintenance and support services:** In order to provide maintenance and support services to our customers, we collect business contact information including email address and phone number. We may also require access to personal information provided by our customers in order to provide these services.
- **Use of the Service:** We may monitor our customers' and Authorized Users' access to and use of the ThoughtWire Platform (for example, date and time of access, Services used, browser information, IP address) in order to detect, investigate or prevent any actual or potential violation of our terms and conditions.

Information We Collect and Use Through the Website and Other Interactions:

- **Inquiries:** If you contact us with an inquiry, you may be asked for information that identifies you, such as your name, work email address and telephone number, along with additional information we need to help us promptly answer your inquiry. We may retain this information to assist you in the future and to improve our customer service and service offerings.

- **Form Submission:** When you submit a form, such as request a demo, or download an ebook, we collect your name, work email address, company name, job title, and country, and give you the option to provide your industry, application of interest, and phone number. We use this information to contact you and otherwise better facilitate your form request.
- **Communications:** We may offer you the ability to sign-up to receive ThoughtWire marketing and promotional communications. We use this information to send you the communications you have requested to receive. You can opt-out of receiving promotional email from us by following the opt-out or “unsubscribe” instructions provided in your email or other message, or by contacting us as set out below. Please note that you will continue to receive informational electronic messages from us.
- **Blog and Forums:** We may collect personal information to provide and administer blogs and forums made available in connection with the Services.
- **Market Research:** We may collect and use [aggregate de-identified data] to conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand).
- **Job Applications:** If you apply for a job at ThoughtWire, you may provide us with certain personal information about yourself, such as information contained in a resume, cover letter, or similar employment-related materials. We use this information for the purpose of processing and responding to your application and assessing your suitability for current and future career opportunities.
- For license management purposes.

II. [How Information is Shared](#)

ThoughtWire does not disclose, trade, rent, sell or otherwise transfer Authorized Users’ personal information to third parties except as set out in this Privacy Policy. ThoughtWire may transfer or disclose personal information as follows:

Customers: ThoughtWire shares information about Authorized Users’ use of the Services to Customers in managing and administering the Services or in response to Customer requests.

Forums and Blogs: If Authorized Users disclose personal information on ThoughtWire’s forums or blogs, this information will be available to the public. All activities of Authorized Users in the public areas of ThoughtWire’s forums will be identified to the Authorized Users’ user names and available to the public.

Affiliates and Service Providers: ThoughtWire may from time to time use the services of affiliates and third-party service providers in connection with our Website, ThoughtWire Platform or Services and may share personal information with them in the course of ThoughtWire’s use of their services. For example, we may use service providers to host our Website, store data, provide back-up services, providing advertising and analytics services and process customer payments. ThoughtWire requires the service providers to commit to protect the confidentiality of information including personal information that is disclosed to them.

Personal information may be maintained and processed by ThoughtWire or its third-party service providers in the United States and Canada. For more information about the way in which our service providers treat personal information, contact us as set out in the “Questions” section below.

Legal Requests: ThoughtWire and our service providers may disclose Authorized User’s personal information: (a) to any governmental authority as part of an investigation to determine ThoughtWire’s compliance with any applicable law, rule or regulation (including privacy laws, rules and regulations); (b) in response to a court order, subpoena, discovery request or other lawful judicial or administrative proceeding which may include disclosure pursuant to a lawful access request by United States or other courts, law enforcement or government authorities;

(c) as otherwise permitted or required under any applicable law, rule or regulation; and (d) in good faith, to protect or defend the rights or property of ThoughtWire and other customers or users.

Sale of Business: ThoughtWire may transfer personal information as an asset in connection with a prospective or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceeding) involving all or part of ThoughtWire or as part of a corporate reorganization or other change in corporate control.

III. Information About Our Website

Visiting our Website: We collect the IP (Internet protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

Cookies: Our Website uses a technology called "cookies". A cookie is a tiny element of data that our Website sends to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user's computer or device when they return. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Website, you may not be able to take advantage of all of the Website features. We may also use a third party to help us gather and analyze information about the areas that users visit on the Website to evaluate and improve the customer experience and the convenience of the Website.

Third Party Links: Our Website may contain links to other websites that ThoughtWire does not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every website you visit.

Analytics: We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the convenience of the Website. You can obtain additional information on Google Analytics' collection and processing of data, including how to opt out, by clicking on the links provided: Privacy & Terms and Data Privacy & Security.

IV. Internet-Based Advertising

We work with third parties such as ad networks and other advertising companies that use their own tracking technologies (including cookies and pixel tags) on our Website in order to provide you with tailored advertisements across the Internet. These companies may collect information about your activity on our Website and third-party websites (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third party websites. This information may also be used to evaluate our online advertising campaigns.

To learn more and to opt-out of having your information used for online behavioural advertising purposes by participating companies, please visit the Digital Advertising Alliance of Canada (DAAC) at <http://youradchoices.ca/choices>.

Please note that even if you opt-out of interest-based advertising by a third party, these tracking technologies may still collect data for other purposes including analytics and you will still see ads from us, but the ads will not be targeted based on behavioural information about you and may therefore be less relevant to you and your interests.

To successfully opt out, you must have cookies enabled in your web browser (see your browser's instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser you use so you must opt-out of each web browser on each computer you use. Once you opt out, if you delete your browser's saved cookies, you will need to opt-out again.

v. [How Information is Protected](#)

ThoughtWire has implemented reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes.

We are committed to educating our staff about the protection of Personal Information, and the importance of compliance with relevant privacy legislation and company policies. Employees and contractors are required to sign confidentiality agreements.

These safeguards help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of Personal Information; however, it is important to remember that no system can guarantee 100% security at all times. In the event that we detect a threat to security or a security vulnerability, we may attempt to contact you to recommend protective measures. Additionally, incidents of suspected or actual unauthorized handling of Personal Information are always directed to ThoughtWire's Legal & Compliance team, which is responsible for determining escalation and response procedures, depending on the severity and nature of the incident. Incidents involving unauthorized handling of PHI will be governed by relevant legislation and, where applicable, the provisions of a BAA, IMA or similar agreement with a customer. If ThoughtWire determines that Personal Information has been misappropriated or otherwise wrongly acquired, ThoughtWire will report such misappropriation or acquisition to you promptly.

vi. [Reviewing, Updating and Accessing Information](#)

If Authorized Users wish to review or update information collected by ThoughtWire, they may log in to their account to make changes. If we receive a request from an individual to access personal information we have collected on behalf of a customer in the course of providing the Services, we will direct that individual to the relevant customer. We will assist our customers wherever possible in responding to individual access requests.

If you are a European resident, please note that we may process your information in order to fulfill a contract with a customer in whose facility you are a resident. Also note that your information will be stored and accessed outside of Europe, which may include Canada and/or the United States.

vii. [Privacy Policy Changes](#)

ThoughtWire will give Customers advance notice of any changes to this Privacy Policy. Customers or Authorized Users using the Services after the effective date of a change are deemed to accept the change.

viii. [Consent and Authorization](#)

By visiting the Website, you are consenting to the use of your Personal Information for the aforementioned purposes. On occasion, we may request additional consent in connection with the use or sharing of Personal Information for a purpose not stated in this Policy or because the law requires such consent.

If you are a customer or business partner of ThoughtWire, we will never use your Personal Information in a manner not otherwise provided for in our written contracts with you, authorization forms you provide to us, or this Policy.

IX. Retention and Deletion

ThoughtWire will retain Personal Information: as necessary for the purposes outlined in this Policy; for as long as a customer account remains active; as required to manage and administer the Services; as required to carry out legal responsibilities (e.g., legal holds and other legal procedures); to resolve a dispute (including enforcement of a contract); or, as communicated to you at the time of collection. After all applicable retention periods have expired, we will delete or destroy your Personal Information in a manner designed to ensure that it cannot be reconstructed or read. If, at any time, it is not feasible for us to delete or destroy your Personal Information, we will continue using the same safeguards of protection and security outlined in this Policy and related subordinate policies, for as long as it cannot be destroyed.

X. Cross-Border Transfers

Unless otherwise specified, ThoughtWire provides the Services from its headquarters in Toronto, Ontario, Canada and hosts customer's production database in the customer's country of residence. In the case of American customers, ThoughtWire may access a customer's data from Canada for purposes of, for example: responding to support requests; fixing software issues; or, providing services to a customer on the back end of the platform (e.g., correcting errors in a record [subject to the conditions set forth in Section VI of this policy], adding/removing a building's data to/from a customer's database in the event of a purchase/sale/change in management, or performing simulation testing of our disaster recovery plan).

XI. Opt-Out Policy

We offer visitors to the Website and our customers using the Services a means to choose how we may use the information they provide to us. If, at any time, you change your mind about:

- i) our use of Personal Information submitted to the Website;
- ii) our use of Personal Information submitted via the Services;
- iii) receiving notices from us (including automatic notifications about updates to the Services and the frequency with which we send you such messages); or
- iv) receiving marketing or sales notices from us, including special offers, product enhancement details, event information, etc.;
- v) sharing your non-personal information with third parties (as described in this Policy), send us a request specifying your choice or change of permission by contacting us.

Please note that, if you choose to impose certain restrictions on our use of your Personal Information – e.g., if we may no longer access your database to perform any necessary quality testing or disaster recovery testing – you may no longer be able to use the Services. Similarly, if you choose to unsubscribe from receiving notifications or messages from us, your customer experience in using the Services may be compromised. If complying with your request would result in termination of the Services, we will make that clear to you and confirm that this is what you want before proceeding.

xii. Questions

It is ThoughtWire's goal to ensure that its privacy practices are comprehensible and easy to understand. If you have any questions, concerns, comments or would like more detailed information, please email the ThoughtWire Privacy Officer at ThoughtWire:

privacy@thoughtwire.com

ThoughtWire reserves the right to update this policy at any time.