



OverVue Planning Systems Inc.

PRIVACY POLICY

Last updated: October 12, 2023

OverVue Planning Systems Inc. (“**OverVue**”, “**we**”, “**us**”, “**our**”) is committed to respecting and preserving the privacy of those who access and use our applications and software (including any content, documentation, and functionality offered thereon) (collectively, the “**Software**”). This privacy policy (the “**Privacy Policy**”) governs the collection, use, and disclosure of personal information that you, the user of the Software (referred to herein as “**you**” and “**your**”), provide to us as you use the Software. By accessing or using the Software, you agree that you have read, understood, and agreed to be bound by this Privacy Policy. If you do not accept the terms of this Privacy Policy, you may not access or use the Software.

As part of our regular review of all our policies and procedures, we may change this Privacy Policy from time to time without notice to you. The date on which this Privacy Policy was last updated will appear at the top of this page. You should periodically review this Privacy Policy so that you are aware of any changes which might affect you. Please also carefully read our End User License Agreement found on our website prior to using the Software. Any capitalized terms not otherwise defined in this Privacy Policy have the same meanings attributed to them in the End User License Agreement.

A. Collection of your Information

For the purposes of this Privacy Policy, personal information (“**Personal Information**”) means any information about an identifiable individual, as may be defined or limited under applicable privacy legislation. Personal Information excludes anonymous or de-identified data that is not associated with a particular individual (herein referred to as “**Non-identifiable Information**”). Personal Information and Non-identifiable Information are collectively referred to in this Privacy Policy as “**Information**”.

1. *What Information do we collect?*

We collect and use several types of Information from and about you, including:

- **Personal Information.** For the purposes of this Privacy Policy, “**Personal Information**” means any information about an identifiable individual, as may be defined or limited under applicable privacy legislation. The Personal Information we collect includes information that we can reasonably use to directly or indirectly identify you, including:

- ❖ Identifiers such as your name, mailing address, e-mail address, and telephone number;

- ❖ Payment information, including credit card and billing information; and
 - ❖ IP address.
- **Non-identifiable Information.** For the purposes of this Privacy Policy, “**Non-identifiable Information**” means anonymous or de-identified data that is not associated with a particular individual, as well as information about a business or business contact information. For clarity, Personal Information excludes Non-identifiable Information. The Non-identifiable Information we collect includes:
- ❖ Non-personal information, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from Personal Information. For example, we may aggregate Personal Information to calculate the percentage of users accessing a specific Software feature.
 - ❖ Technical information, including your login information, device type, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Software, and usage details.
 - ❖ Non-personal details about your Software interactions, including the full URLs, clickstream to, through and from our Software (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Personal Information and Non-identifiable Information are collectively referred to in this Privacy Policy as “**Information**”.

2. How do we collect Information?

We only collect Information that we believe is reasonably necessary for a legitimate purpose, as further described below. We use different methods to collect your Information, including through:

- **Direct interactions with you when you provide it to us**, such as when you access or use the Services, fill in forms, or when you correspond with us through the Software, by email, SMS, phone, or otherwise.
- **User contributions.** You may provide us with Information to publish or display on our Software or transmit to other Software users or third parties.
- **Automated technologies or interactions** as you navigate our Software. Information collected automatically may include usage details, and information collected through cookies or other tracking technologies. The Information we collect automatically is statistical data and does not include Personal Information. We may maintain it or associate it with Personal Information we collect in other ways, that you provide to us, or that we receive from third parties. This helps us to improve our Software and to deliver a better and more personalized service, including by enabling

us to: estimate our audience size and usage patterns; store information about your preferences, allowing us to customize our Software according to your individual interests; speed up your searches and recognize you when you return to our Software.

- Third parties or publicly available sources**, such as other users of the Software, our business partners and service providers, and unaffiliated third parties (such as advertising networks).

We may collect Information that you, or another, provides directly to us by filling in forms, and Non-identifiable Information that we collect from cookies or tracking software we utilize. In addition to Information collected while you use the Software, we may also collect Information in other ways such as over the phone or via email, SMS or otherwise.

The choice to provide us with Personal Information is yours. In certain cases, your decision to withhold Information may limit the Services that we can provide to you.

B. Use of your Information

We will only use your Information for purposes identified in this Privacy Policy, or if required by law. The Information that we collect and store is primarily used for the following purposes:

- to provide you with access to the Software;
- to provide you with information relating to our Software;
- to provide you with information or Services that you request from us;
- to follow up on your comments and suggestions;
- to fulfil the purposes for which you provided the Information or that were described when it was collected, or any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements;
- to notify you about changes to our Software or any Services we offer or provide through it;
- to monitor and conduct analysis of Software usage and value performance;
- to improve our Software, Services, marketing, or customer relationships and experiences;
- to ensure the quality of the Services;
- to manage and develop our business systems and operations;
- to monitor and conduct an analysis of Software usage patterns;
- to post customer testimonials, comments or reviews;
- to protect our rights and property; or
- to lessen a serious threat to personal safety, health or security.

Certain Information, which may include Personal Information, may also be distributed published, displayed, performed, transmitted, streamed, broadcasted, or made available to others users, third parties, or the public for marketing or advertising purposes in connection with our business.

C. Disclosure of your Information

We will not sell, share, trade or otherwise distribute your Personal Information to third parties, except in accordance with this Privacy Policy. However, we reserve the right to use Non-identifiable Information for

any purpose, including commercial purposes, in our sole discretion. Such commercial purpose may include, but is not limited to, sale to third parties to allow them to send targeted advertising messages.

We reserve the right to share any Information collected from you with our affiliates, or to transfer such Information to a successor entity or to an entity which purchases substantially all of the assets of EndFirst.

We sometimes contract with outside organizations to perform specialized services such as hosting the Software. Our suppliers may at times receive, process or handle some of your Information. Only the Information necessary to perform the services under the contract is given to the supplier. Under their contracts with us, our suppliers may use such Information only to carry out the contracted service and must not store or use the Information for any other purpose. Our contracts with suppliers require that they provide a level of protection for your Information that is comparable to our own.

We may also disclose your Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our End User License Agreement and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of EndFirst, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

D. Data Transfers

We may process, store, and transfer your Personal Information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your Personal Information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

E. Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

F. Security

The security of your Personal Information is important to us. To ensure that your Personal Information is secure, we have put in place commercially suitable procedures to safeguard the Information we collect against unauthorized use, disclosure, or modification. Nonetheless, transmission of information on the internet is not completely secure. Therefore, we cannot guarantee the security of data sent to us electronically on our Software, by email, SMS or otherwise and transmission of such data is therefore entirely at your own risk. Likewise, the storage of information is not completely secure and we cannot

guarantee the security of data stored on our system and storage of such data is therefore entirely at your own risk.

G. Minors

Our Software is not intended for persons under the age of majority, and we do not knowingly collect Personal Information from minors. If you believe we might have any information from or about a minor, please contact us at the email address provided below.

H. Updating your Information and Correcting Errors

It is important that your Personal Information be accurate and up-to-date. If any of your Personal Information changes, is inaccurate, or is incomplete, please inform us by contacting us at the email address provided below so that we can make any necessary changes. By law, you have the right to access, verify, and amend all of your Personal Information that we hold about you.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the Personal Information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the Personal Information that we hold about you, or we may have destroyed, erased, or made your Personal Information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

I. Withdrawing your Consent

Where you have provided your consent to the collection, use, and transfer of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at the address provided below. Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

J. Contact Us

If you have any questions, concerns or suggestions regarding this Privacy Policy, please contact us at: inquiries@overvue.visions