

## Privacy Policy

Last Updated: April 1, 2019

HyperComply Inc. (“HyperComply,” “we,” “us,” or “our”) takes the privacy of personal information seriously, including personal information that we process on our customer’s behalf, and we have prepared this Privacy Policy to describe the manner in which we treat personal information.

HyperComply provides a software platform (“Platform”) for companies to manage responses to security questionnaires (the “Services”). This Privacy Policy applies to personal information we process in the course of providing the Platform and Services on behalf of our customers, as well as to the personal information we collect, such as through our website, [www.HyperComply.com](http://www.HyperComply.com) (the “Website”).

### COLLECTION AND USE OF PERSONAL INFORMATION

Information we process on behalf of our Clients:

The HyperComply Platform and Services are not intended to process personal information. However, in the course of providing the Platform and Services to our customers, we may obtain personal information about our customers’ clients, employees or other authorized users of the Services as set out below:

- Information Required to Provide the Services: In order to provide the Platform and Services, we collect business contact information of authorized users or other individuals, as well as personal information that may be contained in security questionnaires or similar documents. We also obtain any personal information that is provided to us by our customers in responses to security questionnaires or similar documents.
- Support Services: We may collect certain information (such as name, email address and query) when we provide user support services by phone, email or within the Platform.

- Use of the Services: We may monitor use of the Platform by our customers' employees or other authorized users in order to detect, investigate or prevent any actual or potential violation of our terms and conditions. We may also generate aggregated, non-identifiable data and use such information to monitor the performance, use and stability of the Platform and to improve the Services.

We require our customers to ensure that they have obtained all authority to provide personal information to us in accordance with applicable privacy laws and to not provide us with any sensitive personal information. Except as set out herein, we do not collect or use personal information of our customers for any purpose other than to provide Services on behalf of our customers.

Information we Collect and Use through our 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, address and a 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.
- Communications/Publications: We may offer you the ability to sign-up to receive HyperComply marketing and promotional communications or download a report, publication or other resources, in which case we collect certain information (such as first and last name, company name, email address or phone number). 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 transactional and account-related electronic messages from us.
- Job Applications: If you apply for a job at HyperComply, 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 may also collect personal information contained in your LinkedIn profile, blog, website or portfolio. We use this information for the purpose of processing and responding to your application and assessing your suitability for current and future career opportunities.
- Feedback: We may collect and use customer feedback about our Services to better understand our customers and enhance our product and service offerings. With your consent, we may publish your feedback on our Website or other promotional materials.

- Surveys and Customer Research: From time to time, we may offer individuals an opportunity to participate in one of our surveys or other customer research. The information obtained is used in an aggregated, non-personally identifiable form. We use this information to help us understand our customers and to enhance our product and service offerings.

## DISCLOSURE OF PERSONAL INFORMATION

As a matter of practice, HyperComply does not disclose, trade, rent, sell or otherwise transfer our customers' personal information, except as set out in this policy.

We may transfer or disclose personal information as follows:

- Service Providers: In connection with our Website, Platform or Services, we may transfer (or otherwise make available) personal information to third parties (including cloud-based service providers) who provide services on our behalf. For example, we may use service providers to host our website, store data and provide back-up services, provide customer support software as a service, process customer payments, provide data analytics services, conduct surveys or obtain customer feedback.

Personal information may be maintained and processed by HyperComply 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 "Contact Us" section below.

- Sale of Business: HyperComply 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 HyperComply or as part of a corporate reorganization or other change in corporate control.
- Legal: HyperComply and our Canadian, US and other service providers and affiliates may disclose your personal information in response to a search warrant or other legally valid inquiry or order (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or

law enforcement agencies), to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable Canadian, US or other law. Where a disclosure of our customers' information is required by applicable law, we promptly notify our customer prior to complying with such requirements (to the extent we are not prohibited from doing so) and fully co-operate with our customer's instructions with respect to our response.

## 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. Cookies may provide us and our service providers with information that we will use to personalize our Website in accordance with a user's preferences. 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 HyperComply 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.

## SECURITY OF PERSONAL INFORMATION

We understand that data security is a critical issue for our customers and we are committed to safeguarding the personal information in our custody and under our control. We have 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.

## RETENTION OF PERSONAL INFORMATION

We retain personal information for no longer than necessary for the purposes of providing Services to our customers or, with respect to the Website, for the purposes set out in this Privacy Policy or to otherwise meet legal requirements.

## ACCESS TO PERSONAL INFORMATION

If we receive a request from an individual to access or update personal information we have collected on behalf of a particular 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 submit personal information via our Website or otherwise provide us with your personal information, you may request access, updating or correction of your personal information (subject to limited exceptions prescribed by law) by submitting a written request to our Privacy Officer (see "Contact Us" below). We may request certain personal information for the purposes of verifying your identity.

## CHANGES

This Privacy Policy may be updated periodically to reflect changes to our personal information practices. The revised Privacy Policy will be posted on the Website. We

strongly encourage you to please refer to this Privacy Policy often for the latest information about our personal information practices.

## CONTACT US

Please contact us at [privacy@hypercomply.com](mailto:privacy@hypercomply.com) if you have any questions or comments about this Privacy Policy or our personal information practices.