# **SUM+IT PRIVACY POLICY**

#### **POLICY OBJECTIVES**

In carrying out standard business operations, under both the <u>Privacy Act</u> and the <u>Personal Information Protection and Electronic Documents Act (PIPEDA)</u> we (SUM+IT) collect personal and private business information/practices as defined by <u>Section #3 of the Privacy Act</u>. This policy is designed to comply with the *Privacy Act* and the ethical principles of natural justice, we are committed to respecting the privacy rights of everyone and every business whose information we have collected.

### WHY WE COLLECT PERSONAL INFORMATION

We collect your personal information deemed necessary for the proper functioning of the app in order to provide the highest level of service. The amount and type of information collected will be limited to that which is needed to fulfill the identified purpose(s). We use your personal information for the purpose with which it was obtained or for a use consistent with that purpose.

#### WHAT PERSONAL INFORMATION WE COLLECT

We collect information when you create an account beginning with our *Customer Registration Form*; when you use any interactive features of our services such as the storing product codes, completed quotes, stored defaults and costing variables; when you request customer support or otherwise communicate with us; and any other information necessary for business transaction.

## WHO SEES YOUR PERSONAL INFORMATION

Access to information within the SUM+IT organization is restricted to SUM+IT staff that need the information in order to carry out their duties in maintaining and improving the service.

All individuals we hire on a contract basis or other means to conduct business on our behalf will be required to respect the provisions of the *Privacy Act* as well as this policy and any related internal procedures.

## HOW WE PROTECT YOUR PERSONAL INFORMATION

In any organization, failure to protect personal information can increase the risk of a privacy breach and lead to reputational harm.

SUM+IT understands its responsibility to protect personal information under its control. We will protect personal information from loss or theft, disclosure, modification or destruction through appropriate administrative, technical and physical security measures and safeguards.

#### USF OF DATA

We do not share personal information you have provided to us without your consent, unless:

- Doing so is appropriate to carry out your own request
- We believe it's needed to enforce our legal agreements or that is legally required
- We believe it's needed to detect, prevent or address fraud, security or technical issues

We may use information from you for various purposes, including to:

- Provide, maintain, and improve our Services and develop future Services;
- Provide and deliver the services you request, process transactions and send you related information, including confirmations and invoices;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service and training;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of SUM+IT and others;
- Coordinate and facilitate our recruiting, hiring and staffing needs

### CONSENT

We seek a person's consent before any personal or business information may be collected. Consent is given when a person authorized to represent your company submits the information to SUM+IT using the submit feature on our *Customer Registration Form*.

In the event it is not possible to fill out the *Customer Registration Form,* consent can be given in an email, in writing, fax or any other form of communication that can be verified at a later date.

## **OUR ROLES AND RESPONSIBILITIES**

We are responsible for the information that we collect, use, retain and destroy in fulfilling our standard business operations. We will continue to develop policies and practices to ensure that information is handled within accordance of the *Privacy Act*. Our Privacy Officer is responsible for overseeing the implementation of those policies and practices along with:

- Provide consistent training for all SUM+IT staff, (including contractors and casual staff) outlining our
  expectations with the handling of information
- Ensuring procedures are in place under which individuals may request access, make corrections, and file complaints with the management or handling of their personal information.
- Ensuring procedures are in place under which individuals are notified of an improper collection, retention, use, disclosure or destruction of their personal information

• Monitor the degree of compliance with this Policy and where required to initiate action to correct any issues.

Violation of this Policy through intent or by neglect may and can result in disciplinary action up to and including termination of employment or association with SUM+IT.

Legal sanctions may also be pursued if deemed appropriate.

## **CHANGES TO OUR PRIVACY POLICY**

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used.

If we make major changes in the way we collect or use information, we will notify you by posting an announcement on our website or sending you an email.