**Data Solutions Technologies – Anti-Spam (CASL) Policy**

**Effective Date:** [Insert Date]  
**Last Updated:** [Insert Date]

**Policy Overview**

This Anti-Spam Policy sets out how **Data Solutions Technologies** complies with Canada’s Anti-Spam Legislation (CASL). The goal of this policy is to ensure that any commercial electronic messages (CEMs) sent by or on behalf of our company — whether from or to systems in Canada — follow a consistent, lawful, and transparent process.

We are committed to preventing spam, protecting recipients’ rights, and maintaining the trust of our clients, partners, and prospective customers.

**Scope of Application**

This policy applies to all employees, contractors, and authorized representatives of Data Solutions Technologies who may send, manage, or authorize the sending of CEMs that:

* Originate from a Canadian computer system,
* Are directed to recipients using Canadian systems or addresses, or
* Are accessed by recipients located in Canada.

All CEM-related practices must comply with CASL and this Anti-Spam Policy.

**Consent Practices**

We obtain express, opt-in consent before sending CEMs, unless a valid basis for implied consent exists (such as an existing business relationship within the last two years) or where CASL provides an exemption.

Consent must be captured in a clear, standalone manner — for example, through an unchecked opt-in box on a form or through verbal consent that is documented. Consent cannot be bundled with unrelated agreements, and recipients must be informed of their right to withdraw at any time.

Records of express consent and implied consent must be maintained in our client management systems for verification. These records are retained for a minimum of three years after communications have ceased.

**Form and Content of Messages**

All CEMs sent by or on behalf of Data Solutions Technologies must:

* Clearly identify the sender,
* Include a valid physical mailing address,
* Provide a functioning phone number, email, or website link for contact, and
* Contain an easy-to-use unsubscribe option.

We also require any third-party vendors sending CEMs on our behalf to meet these same standards.

**Managing Relationships & Records**

Accurate records of customer and prospect relationships must be maintained to demonstrate compliance with CASL. These include:

* Documented express consents,
* Evidence of implied consent (such as business transactions), and
* Records of unsubscribe or do-not-contact requests.

Such data must be kept current in the relevant CRM or email marketing system.

**Commercial Electronic Messages (CEMs)**

A CEM is any electronic message (email, SMS, social media, etc.) that promotes, markets, or solicits business for Data Solutions Technologies, its services, or its employees. Examples include newsletters, promotional offers, event invitations, or product announcements.

Internal communications, regulatory notices, and responses to inquiries are generally exempt, provided they do not include marketing content.

**Unsubscribe Mechanism**

Every CEM must provide recipients with a straightforward method to opt out. Requests to unsubscribe will be processed promptly and no later than **10 business days** from receipt. Once a recipient unsubscribes, their contact details will be flagged to prevent future non-compliant communications.

**Third-Party Compliance**

Any third party engaged to send CEMs on behalf of Data Solutions Technologies must contractually agree to comply with CASL requirements, including message format, consent management, and unsubscribe handling.

**Policy Oversight and Enforcement**

This policy is reviewed annually to ensure it remains aligned with CASL requirements. Any exceptions or changes must be formally approved by company leadership.

Failure to comply with this policy may result in disciplinary action and, in cases involving third-party vendors, may lead to termination of contracts.

**Contact Information**

For questions about our Anti-Spam Policy or to report concerns, please contact:

**Data Solutions Technologies**

Email: privacy@datasolutionstech.com

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