



## Privacy Policy

Sylvain Labs Inc. ("Company") has created this privacy policy statement in order to demonstrate our firm commitment to your privacy. The following discloses our practices regarding information collection and use by the Company, including without limitation, information collected and used in connection with the web site located at [www.sylvainlabs.com](http://www.sylvainlabs.com) (the "Website"), the services we provide for our clients, our employment practices, or other relationship we may have to you (collectively, the "Service"). It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your information. This privacy policy supplements other policies and is not intended to override them. By using or accessing the Service, you signify your agreement to be bound by this privacy policy. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY PLEASE DO NOT ACCESS OR OTHERWISE USE THE SERVICE. **Information We Collect:** We may collect and maintain Personal Information about you when you voluntarily provide it to us, such as when you complete an online form, contact us, submit an application for employment, participate in a focus group, engage the Company to provide you with our services, and/or when you provide services to the Company. This information may include your name, email address, physical address, phone number, occupation, employer, education, payment information, or other similar personally identifiable information about you ("Personal Information"). In addition, if you participate in a focus group we may collect information about your interests, preferences, opinions, and experiences related to products or services provided by our clients or their competitors. Where we need to collect Personal Information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform our responsibilities outlined in the contract we have or are trying to enter into with you

In addition, we may also collect non-personally identifiable information, such as IP addresses, web pages viewed, browser type, referring pages, usage and browsing habits, system logs, and similar data, and may aggregate information in a manner which does not identify any individual ("Aggregate Information").

### **Information Usage, Disclosure and Recipients:**

By providing us with your Personal Information, you consent to receive information and updates regarding our Services. We will only use your Personal Information as described herein, unless you have specifically consented to another type of use, either at the time the Personal Information is collected from you or through some other form of consent from you or notification to you:

- We may use your Personal Information to respond to your inquiries or requests or to provide you with the Services.

- We may use your Personal Information to send you emails from time to time about our Services, but we will not provide your Personal Information to third parties for them to contact you directly unless otherwise permitted by this Privacy Policy or you provide your consent.
- We may permit our vendors and subcontractors to access and process your Personal Information, but they are only permitted to do so in connection with performing services for us. They are not authorized by us to use the information for their own benefit.
- We may disclose Personal Information as required by law or legal process.
- We may disclose Personal Information to investigate suspected fraud, harassment or other violations of any law, rule or regulation, or the terms or policies for our services.
- We may transfer your Personal Information in connection with the sale, merger, reorganization or change of control of the Company or as part of a bankruptcy proceeding.
- Personal Information collected through focus groups may be shared with the marketer who has engaged us to conduct such focus group.

Please note that if you specifically consent to additional uses of your information, we may use your information in a manner consistent with that consent.

We may, to the extent permitted by applicable law, retain the right to use and disclose Aggregate Information in any manner permitted by law.

**Grounds for Using Your Personal Information:** We rely on the following legal basis to process your Personal Information:

- It may be necessary for us to use and disclose your Personal Information for the performance and fulfillment of the contract between us and to provide you with our Services;
- We may use and disclose your Personal Information where it is necessary for our legitimate interests (or those of a third party) and your interest and fundamental rights do not override those interests;
- We will process, transfer, disclose and preserve Personal Information when we have a good faith belief that doing so is necessary in relation to the use for which you have given consent.

**Cookies:**

We may store some information on your device or device hard drive as a "cookie" or similar type of file (such as clear gifs, web beacons, tags, and similar technologies) to collect data related to usage of the Website and for the purpose of facilitating and enhancing your communication and interaction with the Website. Examples of the information we may collect include: your unique Internet protocol address; the name of your Internet service provider; the town/city, county/state and country from which you access our Website; the kind of browser or computer you use; the number of links you click within the Website; the date and time of your visit; the web page from which you arrived to our Website; and the pages you viewed on the Website. We use this information to help us maintain and enhance the efficiency and usefulness of the Website and may use it for the purposes described in this Privacy Policy. We may also use and place cookies on your device from our third party service providers in connection with the Website, such as an analytics provider such as Google Analytics or Hotjar which helps us manage and analyze Website usage. To opt-out of the use of Google Analytics, [click here](#). To opt out of Hotjar analytics, [click here](#).

You may stop or restrict the placement of cookies and similar technologies on your computer or device or flush them from your browser by adjusting your web browser preferences, in which case you may still use our Website, but it may interfere with some of its functionality. We do not use cookies to automatically retrieve Personal Information from your computer without your knowledge.

**Security:**

The security of your Personal Information is very important to us. Due to the inherent open nature of the Internet, we cannot guarantee that communications between you and Company or information stored on the Service or our servers, will be free from unauthorized access by third parties such as hackers and your use of the Service demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your Personal Information.

**Record Retention:**

If you provide us with Personal Information through the Website, we retain your information for as long as necessary for our business purposes. This may include, but is not limited to, retaining such information to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your Personal Information, we may continue to retain and use Aggregate Information previously collected. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

**Protection for Children:**

We have no intention of collecting Personal Information from children under the age of 13. When we become aware that Personal Information from a child under 13 has been collected without such child's parent or guardian's consent, we will use all reasonable efforts to delete such information from our database.

**Other Web Sites:**

As a convenience to you, we may provide links to third-party web sites from within the Website. Company is not responsible for the privacy practices or content of these third-party sites. By linking to such web sites we are not endorsing their content or practices. We encourage you to be aware when you access any such third-party sites and to read the privacy policies of each web site that you access.

**Social Media:** The Website contains links and interactive features with various social media platforms. If you already use these platforms, their cookies may be set on your device when using our Website. These social media platforms collect information pursuant to their own policies. We do not control their practices, so you should read their policies on their sites. You should be aware that information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services, you assume the risk that information provided by you may be viewed and used by third parties for any number of purposes.

**Updating or Changing Your Personal Information:** We understand that your Personal Information can change over time. If you would like to notify us of any changes to your Personal Information, please contact us at [privacy@sylvainlabs.com](mailto:privacy@sylvainlabs.com). You may also request access to your Personal Information (if you have provided such information to us through the Website) and information about our collection, use and disclosure of that information by using the contact information provided above. Unless prohibited by law or legal process, you will be given reasonable access to your Personal Information, entitlement to challenge the accuracy and completeness of the information, and the ability to have it amended as appropriate.

**Changes to policy; Opt-Out Process:**

We reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time. However, if at any time in the future we plan to use Personal Information in a way that differs from

this policy, we will post such changes here or otherwise provide you with notice, as may be required by law, and provide you the opportunity to opt-out of such differing uses. Your continued use of the Service following the posting of any changes to this policy means you accept such changes.

**Your Choices, Rights, and the Opt-Out Process:**

All unsubscribe or opt-out requests with respect to Company's commercial emails should be sent to us at [privacy@sylvainlabs.com](mailto:privacy@sylvainlabs.com) and we will process your request within a reasonable time after receipt. We are not responsible for removing your Personal Information from the lists of any third party who has previously been provided your information in accordance with this policy, such as a business partner.

Subject to local law, you may also have certain rights regarding information that we have collected and that is related to you. If you are located in the European Union with rights under the General Data Protection Regulation ("GDPR"), you have the right to withdraw previously provided consent for our processing of your Personal Information by contacting us at [privacy@sylvainlabs.com](mailto:privacy@sylvainlabs.com). Such individuals also have the following rights:

- **Right to access** – This right allows individuals to obtain confirmation that his or her Personal Information is being processed and allows individuals to request details of the processing of his or her Personal Information, including, without limitation, categories of recipients to whom the Personal Information have been or will be disclosed and purposes of processing.
- **Right to rectify** – This right allows individuals to rectify any inaccurate Personal Information about him or her.
- **Right to restrict processing** – This right allows individuals to block or suppress processing of Personal Information under certain circumstances.
- **Right to be forgotten** – This right is also known as the "right to erasure." It is an individual's right to have Personal Information erased or to prevent processing in specific circumstances.
- **Right of data portability** – This right allows individuals to move, copy or transfer Personal Information from one place to another in a secure manner without interrupting the integrity and usability of the information.
- **Right to object to processing** – This right allows individuals to object to certain types of processing, including direct marketing, profiling and providing for purposes of scientific or historical research and statistics.

To exercise any of the following rights, you may contact us at [privacy@sylvainlabs.com](mailto:privacy@sylvainlabs.com).

**Contact:** For questions or concerns relating to privacy, we can be contacted at: [privacy@sylvainlabs.com](mailto:privacy@sylvainlabs.com). If you are located in the European Union with rights under the GDPR and have any complaints regarding our privacy practices, you have the right to complain to a supervisory authority.

**Cross Border Transfers:** Our servers are maintained in the United States of America. By using the Service, you authorize the export of Personal Information to the USA and its storage and use as specified in this policy. You understand that data stored in the USA may be subject to lawful requests by the courts or law enforcement authorities in the USA. We may transfer Personal Information from the European Economic Area and Switzerland to the USA and other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. Personal Information of individuals located in the European Union will be transferred in compliance with the requirements of the GDPR.

**Effective Date:** This privacy policy is effective and was last updated on May 25<sup>th</sup> 2018