

## **PuroCLEAN CANADA**

### **Personal Information and Privacy Policy**

This personal information and privacy policy (the "**Privacy Policy**") was last amended on **March 13, 2023**.

PurRestore Management Services Inc. ("**Franchisor**") and its affiliated companies and its network of franchisees across Canada ("**Franchisees**", and together with Franchisor and its affiliated companies, collectively, "**PuroClean Canada**") consider matters relating to the protection of personal information and privacy to be extremely important. In developing this Privacy Policy, PuroClean Canada wants to assure you that PuroClean Canada has taken into account your personal information and privacy and those of others. PuroClean Canada has created and implemented this Privacy Policy so that you understand how your personal information may be utilized and disclosed and how it is protected.

This Privacy Policy describes the kind of personal information we may collect in connection with your visit to our website at puroclean.ca (the "**Website**") and our restoration services and in connection with any other interaction you may have with us (collectively with the Website, the "**Services**").

By dealing with PuroClean Canada or by providing personal information in connection with your use of the Services, we will assume that you have consented to the collection, use and disclosure of your personal information in accordance with this Privacy Policy.

If you have questions regarding this Privacy Policy or our privacy practises, then please contact our Privacy Officer. His or her contact information is set out at the bottom of this Privacy Policy.

#### **Our Commitment**

Except as otherwise provided in this Privacy Policy, PuroClean Canada will not sell, rent, loan, trade, lease, transfer or otherwise disclose personal information, including e-mail addresses, to any third party.

#### **Amendments to this Privacy Policy**

PuroClean Canada may amend this Privacy Policy at any time by posting a new privacy policy in place of this one. These amendments may include, without limitation, adding to, deleting from or modifying any of the provisions in this Privacy Policy. PuroClean Canada will post notice that the Privacy Policy has been amended on the fronting webpage of its main website at [www.puroclean.ca](http://www.puroclean.ca) for a period of 30 days. The amended privacy policy shall automatically be effective when posted. Your continued dealings with PuroClean Canada or use of the Services following the posting of the amended privacy policy and the posting of such notice shall mean that you accept the terms of this Privacy Policy as amended. If you do not agree with any of the terms or conditions in the amended Privacy Policy then you agree to immediately cease all use of the Services and cease in your dealings with PuroClean Canada, which shall be your sole recourse and remedy in the event you are dissatisfied with the amended Privacy Policy. This Privacy Policy may not otherwise be amended.

The first sentence of this Privacy Policy indicates when the Privacy Policy was last amended. Please check back regularly to review for changes.

#### **Definitions**

In this Privacy Policy, the following term has the following meaning:

- **"personal information"** means information about an individual. Personal information does not include information that cannot be attributed to an individual, for example, information of an aggregate or anonymous nature.

### **Personal Information Made Anonymous**

To the extent that we make any personal information anonymous or we aggregate it with the personal information of others, then that information will no longer be considered to be personal information. Therefore, PuroClean Canada will be entitled to use and disclose personal information in any manner that it desires provided the personal information has been rendered anonymous or aggregated where that information cannot be attributed to any individual.

### **Choosing to Provide Personal Information**

In using the Services and in dealing with us you will have the ability to control the amount of personal information you provide to us and therefore you may restrict the use and disclosure of personal information we collect from you by not providing personal information in connection with the Services or to us in the first place. However, if you choose to limit the personal information you provide, it may limit the manner in which you can make use of the Services or otherwise interact with PuroClean Canada.

### **Consent**

You are required to obtain any consents needed before you provide any personal information of any other individual in connection with the Services or to us and for the processing and disclosure of that personal information as part of the Services and our handling of the personal information as described in this Privacy Policy.

When we collect, use or disclose your personal information we will generally obtain your consent. Most of the time, we will obtain your consent before or at the same time we collect your personal information. When we collect personal information from you, we will inform you of the uses and disclosures that we wish to make of your personal information unless those uses and disclosures are readily apparent at the time we collect the personal information or are set out in this Privacy Policy.

In some instances, however, we may seek your consent after we have collected your personal information if we wish to make an additional use or disclosure of your personal information where we do not already have your consent for that new use or disclosure. This additional consent may be obtained through an amendment to this Privacy Policy as provided above.

### **Consent Through This Privacy Policy**

This Privacy Policy sets out certain circumstances where we may collect, use and disclose your personal information and, as such, this Privacy Policy operates to obtain your consent to such collection, use and disclosure. By using the Services or by providing personal information in connection with your interactions with us, we will assume that you have consented to the collection, use and disclosure of your personal information as set out in this Privacy Policy unless you advise us otherwise.

### **Changing Your Consent**

You may change or withdraw the consents you have provided at any time on reasonable notice by contacting our Privacy Officer as set out below. Further, you may change or withdraw the default consents set out in this Policy at any time on reasonable notice by contacting our Privacy Officer. If you withdraw certain consents, it may limit the manner in which you can make use of the Services and to otherwise interact with us. For clarity, your ability to change or withdraw consent is not absolute.

PuroClean Canada reserves the right to continue handling your personal information in those circumstances required or permitted by law despite a change or withdrawal of consent.

**Purposes for Collection**

Except as otherwise provided in this Privacy Policy, we will obtain your explicit or implied consent to collect, use and disclose your personal information. The following sets out some of the information we may collect and how it may be used and disclosed:

<b>Categories of Personal Information</b>	<b>Categories of Sources</b>	<b>Purpose(s) for Collection of Personal Information</b>	<b>Categories of Third Parties with Which Personal Information is Shared for a Business Purpose</b>
Personal Identifiers: such as name, postal address, [●]	Franchisees Individuals requiring PuroClean Canada services	Providing products and services [●]	Service providers (vendors that provide services to us in connection with the operation of our business, which can include vendors that provide remediation services, processing payments, [●]) Franchisees Insurance companies
Sensitive information: such as gender, age, disability status, pregnancy status, citizenship status, medical condition, physical or mental disability	Employees	Human resources functions	Service providers
Professional or employment information: such as information about past employers, work history, skills, educational background, and references	Job applicants Employees Recruiting agencies or platforms Individuals who submit franchise applications	Human resources functions Recruiting Evaluation of franchise application	Service providers
Property information: such location, property details, damage, inventory of items at the property	Franchisees Individuals requiring PuroClean Canada services	Providing products and services	Franchisees Insurance companies Service providers
Internet or other electronic network activity information: including browsing history	Individuals interacting with the Website Employees	Security processes Providing products and services	Franchisees Service providers

## **Disclosure**

Except as otherwise provided in this Privacy Policy, when we disclose your personal information we will ensure that you had previously provided your consent to that disclosure or if you had not previously provided that consent, we will then obtain your consent if that disclosure is not set out in this Privacy Policy or if that disclosure was not readily apparent at the time we collected the personal information.

Set out below are certain additional circumstances where we may disclose your personal information without obtaining any further consent. By providing personal information to us, we are assuming that you are consenting to these disclosures unless you inform us otherwise. These are:

- In the event PuroClean Canada transfers or is considering transferring control of any or all of its operations or services to another organization, PuroClean Canada reserves the right to transfer and disclose your personal information to that organization. However, PuroClean Canada will require that the organization agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose your personal information as PuroClean Canada is similarly entitled under this Privacy Policy; and
- PuroClean Canada may engage certain service providers. Those service providers may provide services to PuroClean Canada to assist PuroClean Canada in its activities. Other service providers may provide services directly to you at the request of PuroClean Canada. These services provided by the third-party service providers include marketing, market research (including by using other available data to gain greater insights about our clients), promotional contests, customer relationship management, payment, information technology, website hosting and maintenance services. As such, it may be necessary for PuroClean Canada to disclose your personal information to these service providers. However, PuroClean Canada will take steps to ensure that these service providers will only use and disclose your personal information as necessary to provide the services.

As well, as discussed above, some of your personal information may be disclosed between the Franchisor and Franchisees and between Franchisees in delivering services and products to you. For example, if you use the services of a Franchisee we may manage information related to the service on behalf of the Franchisee. If you then use a different Franchisee, that Franchisee will have access to information that you may have previously provided to any of our other Franchisees.

## **Information We Collect Automatically When You Use the Website**

When you access or use our Website, we automatically collect certain information through certain mechanisms, including, but not limited to:

- **Log Information:** We collect and log information about your access and use of our Website, such as your domain name and/or your IP address, the type of browser you use, access times, pages or information viewed, browsing behavior, the page you visited before navigating to our website and any search terms and search engines used to find the Website.
- **Information Collected with Tracking Technologies:** We and our service providers use various tracking technologies, including cookies, web beacons and embedded scripts, to collect information about you and your interaction with our Website, including information about your browsing behavior. Cookies are small data files stored on your hard drive or in device memory. Web beacons (also known as clear GIFs and pixel tags) are electronic images that may be used with our Website or emails. Embedded scripts are programming code that run when you use our Website which can facilitate the collection of information.

The foregoing mechanisms and the information collected are used to: (i) to recognize a visitor when they return and to tailor the information and services provided to the visitor based on their previous visits; (ii) understand use of the Website, such as number of visits, average time spent on the Website, pages viewed, features used and campaign effectiveness; (iii) improve the Website and related systems; (iv) assist with the operation and management of the Website; and (v) monitor use of the Website, to ensure proper operation, security and to prevent misuse.

For more information about the foregoing technologies, and how to disable them, please see "Managing Cookies, Trackers, Scripts, Location and Social Media Information" below.

### **Social Media Features**

The Website may use certain social media features (such as the Facebook "Like" button) which let you share actions you take on our Website with other media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social media feature. These social media services use a variety of trackers which collect personal information even if you do not use these features on our Website. For more information about the purpose and scope of data collection, processing and disclosure in connection with social sharing features, please review the privacy policies of the entities that provide these features.

### **Google Tag Manager Website**

We use Google tag manager services to evaluate use of our Website. Google tag manager services uses tags and other identifiers to collect information, such as how often users use the Website, what pages they visit, when they do so, and what other websites they visited prior to visiting our Website. Google tag manager services may collect your IP address, data related to the device/browser you are using, and other information about your use of our Website. Google tag manager services provides us with statistical information about the use of our Website. We use this information to understand our visitors and to improve the Website. We cannot associate any of this information with any particular visitor.

Google tag manager services collects information on your activities on our Website and may associate it with other information that they may have collected about you and they may use all of this information for their own business purposes. See <https://policies.google.com/technologies/partner-sites> for more information on Google's privacy practices with respect to websites that use Google services.

**[Drafting Note: All third parties that may collect personal information for their own business purposes, whether through cookies, web beacons or scripts, should be listed. A link to their privacy policies should also be provided. This can be done in a table format.]**

### **Managing Cookies, Trackers, Scripts, Location and Social Media Information**

Many web browsers have settings to notify you when you receive a cookie, web beacons and other trackers and to allow you to block these cookies, web beacons and other trackers and may allow you to disable scripts. If you block any of these items you may not be able to access certain parts of the Website or certain functionality or features may not work properly or may not be available. You may be able to block cookies, web beacons and other trackers and scripts by following the instructions on your browser. Your browser may also allow you to delete cookies and other trackers already stored.

As well, your computer or mobile device or browser may allow you to prevent your location from being shared with third parties.

Many social media services allow you to select how your personal information is collected, used and shared. Please check with your social media services for your options.

### **Do-Not-Track Signals**

Some web browsers may provide the option to transmit "do-not-track" signals to websites a user visits. We currently do not respond to browser "Do-Not-Track" signals.

### **Other Collection, Use and Disclosure**

PuroClean Canada may monitor your use of the Website to ensure the proper use, operation and security of the Website and your compliance with any terms of use related to the Website or other related agreements.

As well, the law permits or requires the collection, use and disclosure of personal information without the knowledge or consent of the individual in a number of circumstances. We reserve the right to collect, use and disclose your personal information in these circumstances without your knowledge or consent as the law may permit or require.

### **Children**

We do not knowingly collect any personal information from children under the age of 13 without parental consent, unless permitted by law. If we learn that a child under the age of 13 has provided us with personal information, we will delete it in accordance with applicable law.

### **Links to Third-Party Sites**

Our Website may link to third-party websites and services. We are not responsible for the security or privacy of any information collected by third-party websites and services. Please exercise caution and review the privacy statements applicable to the third-party websites and services you use.

### **Retention and Destruction**

For legal and business purposes we may retain your personal information for as long as it is reasonably needed. Upon expiry of the appropriate retention period, bearing in mind our reasonable legal and business requirements, your personal information will either be destroyed in a secure manner or made anonymous. You should be aware that there are legally required minimum retention periods, which PuroClean Canada must and does observe.

### **Security of Personal Information**

PuroClean Canada recognizes its obligation to protect personal information in its possession and will make reasonable arrangements to secure that personal information against unauthorized access, in compliance with the requirements at law. These measures will be reasonable in the circumstance and may include providing access to only those individuals with a need to know the information, locked doors and/or filing cabinets and other physical and electronic security measures as well as contractual measures, such as non-disclosure or confidentiality agreements.

### **Storage and Processing Information Outside Canada**

Certain of our affiliated companies are located in the United States. As well, certain of our service providers are located outside of Canada. As such, we may transmit your personal information to our affiliated companies and to third parties who are located outside Canada to assist us in the operation of our business. By providing personal information to us, you are consenting to the delivery and the storage, processing and handling of your personal information outside of Canada. Please note that many governments around the world can require that organizations under their jurisdiction deliver information,

including personal information, that is in the control of that organization to the government. This is often done without notice to or the consent of the affected individual.

### **Accuracy and Completeness**

When we collect, use or disclose personal information, we will make a reasonable effort to ensure that it is accurate, up-to-date and complete. To do so, we may need to request additional information from you or have you verify your information. If your personal information does change, we would appreciate it if you could inform us of those changes in order that your personal information in our possession remains accurate.

### **Requests for Access to Personal Information**

On your written request we will provide you with:

- access to your personal information (if any) under our custody or control;
- information about the purposes for which your personal information under our custody or control has been and is being used by us; and
- the names of persons to whom, and the circumstances in which, your personal information has been and is being disclosed by us.

All requests may be subject to reasonable fees and disbursements. Where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to personal information.

We require that all requests for access be in writing and be signed by the requestor. We required sufficient information and detail from the requestor in order to verify their identity, properly locate the information and respond to the request.

An individual's ability to access his or her personal information under our control is not absolute. PuroClean Canada reserves all rights to not disclose personal information in certain circumstances as permitted by law, such as, where personal information has been collected in connection with a legal proceeding.

### **Limited Nature of this Privacy Policy**

Nothing contained in this Privacy Policy is intended to create a contract or agreement between PuroClean Canada and you and you may not rely on it as such.

### **Contacting or Communicating with Us**

If you:

- have any questions with respect to our privacy policies or practises;
- have any questions with respect to our handling of your personal information;
- if you wish to request access to or correction of your personal information under our care or control; or
- if you are dissatisfied with our handling of your personal information or any of our responses,

please contact our Privacy Officer at:

**Attention: Privacy Officer**

Contact: PuroClean Canada  
6790 Century Ave, Suite 400B  
Mississauga, ON  
L5N 2V8

email: [hciechorski@puroclean.ca](mailto:hciechorski@puroclean.ca)