

Vubiz Privacy Policy

Vubiz Ltd is committed to protecting the privacy of its customers, employees and visitors to our website(s), and to keeping all personal information accurate, confidential, secure and private. Our company privacy code is based on the following ten principles of fair information practices, as mandated by the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information (CAN/CSA-Q830-96), and the Federal Personal Information Protection and Electronic Documents Act (PIPEDA) and covers all standards for the collection, use, retention and disclosure of what is reasonably deemed personal information.

Principles

1. **Accountability:** Vubiz is responsible for the personal information it controls and will designate one or more individuals to be accountable for the company's compliance with the procedures and principles set out in the Privacy Policy outlined herein.
2. **Identifying Purpose:** Vubiz will identify the purpose for which personal information is collected at or before the time it is collected. The purposes for which information is collected, used or disclosed by Vubiz must be those that a reasonable person would consider are appropriate in the circumstances.
3. **Consent:** Express knowledge and consent of individual(s) is required for the collection, use or disclosure of personal information, except where consent is not required by privacy legislation as, for example, where the collection, use or disclosure of personal information is solely for journalistic, artistic or literary purposes.
4. **Limiting Collection:** Vubiz shall limit the collection of personal information to that which is necessary for the purposes identified by the company. This personal information shall be collected by fair and lawful means.
5. **Limiting Use, Disclosure and Retention:** Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of the purposes for which it was collected.
6. **Accuracy:** Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards:** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
8. **Openness:** Vubiz shall make readily available to its customers and employees specific information about its policies and practices relating to the management of personal information.
9. **Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information except where Vubiz is permitted or required by law not to disclose personal information to the individual customer or employee. An individual customer or employee shall be able to challenge the accuracy and completeness of the information disclosed to him or her and have it amended as appropriate.
10. **Challenging Compliance:** An individual customer or employee shall be able to address a challenge concerning compliance with the principles in the Vubiz Privacy Policy to a designated Privacy Compliance Officer.

General Privacy Policy

Further to full compliance with CSA and PIPEDA standards (as defined above), Vubiz adheres to the policies and procedures presented herein. Vubiz recognizes that all individuals and organizations have the right to refuse to consent to our collection, use or disclosure of information at any time and requires their express knowledge and consent to collect personal information, and will be informed of the purpose for which the information is being collected and any consequent rights to access of such information. Our Website collects only non-personal information based on a visitor's Internet Protocol (IP) address (this is not personally identifiable). Information collected includes the date and time of visit, the type of Internet browser used to access the site, and the referring address (the link a visitor uses to access the site).

This data is used to create statistics on site usage and to improve online services. Anyone can visit all public areas of the Vubiz site without providing any personal information. Personal information collected by Vubiz, that you supply voluntarily, is information you supply by e-mail or when registering in a secure portion of this site. This information is normally limited to name, title, company, company address, e-mail address, language, country or location. Any other information would include specifics needed to provide a service you requested, ie e-commerce or e-learning. Your information will only be viewed by Vubiz personnel who need that information for the purpose for which it was given. Vubiz will not disclose your personal information to anyone outside Vubiz without your express knowledge and consent or unless required by law.

Vubiz may use and disclose your Personal Information:

- To identify you;
- To deliver products or services, such as newsletters, events, training or software that you request or purchase;
- To allow you access to limited entry areas of our site as contracted or agreed upon;
- To assess and update your information;
- To analyze the suitability of our products or services for you;
- To determine your eligibility for our products and services;
- To set up, manage and offer products and services that meet your needs;
- To conduct e-commerce activities as pre-arranged/contracted with you;
- To establish, maintain and manage our relationship with you and provide you with ongoing service;
- To administer the delivery of products and services to you from us, our affiliates or selected third parties, and to monitor, service, process and maintain your account;
- To protect you and Vubiz against error and fraud;
- To better understand your current and any future needs;
- To market and promote new products and services to you;
- To update our files and the files of our affiliates and selected third parties; and
- To meet all legal requirements.

Access

If you have any questions about the collection, use or disclosure of your personal information by Vubiz, or if you simply want to know whether we have any of your personal information on file, you may contact the Privacy Compliance Officer at (905) 815-1204 ext. 40 or e-mail privacy@vubiz.com. Vubiz will only refuse access to information about you in those circumstances permitted or required by applicable privacy legislation. If Vubiz refuses access to you, it will provide you with the reasons for its refusal upon request. Exceptions may include information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege. Vubiz will respond to your requests for access in accordance with applicable privacy legislation.

E-mail

When you communicate with Vubiz using e-mail, Vubiz will use your e-mail address to respond to comments or questions. The information you provide by e-mail including your e-mail address, and our response to your e-mail, will be kept as long as necessary for its business purposes.

Security

Vubiz uses a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. For example, we store the personal information you provide in computer servers with limited access that are located in controlled facilities. When we transmit sensitive information (such as a credit card number) over the Internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol. We may also collect certain information about your computer hardware and software. This information may include: your IP address, browser type, operating system, domain name, access times and referring Website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics.

Vubiz also collects information about which page(s) our customers visit within our site(s). This site visitation data is identified only by a unique ID number, and it is never linked with personal information unless a user consents. Vubiz uses a proprietary registration and authentication service. When you sign-in to our site(s) using this service, you will be asked to provide your Customer/Account id and a password.

Tracking Software

Vubiz uses software that monitors site traffic and detects unauthorized attempts to upload or change information, or otherwise cause damage. The software is also used to collect identifiable and non-identifiable information to understand users' needs, develop customized products and services and manage and develop our operations and business. The software receives and records the Internet Protocol (IP) addresses of the computers that have visited this site, including the date and time of visits, the pages that were viewed and downloaded and the identifier attributed to any registered user who accesses any restricted areas on this site. The software also captures other non-identifiable information such as type of browser, operating

system, clock and resolution settings as well as other information based on your browser settings. Vubiz does not attempt to link any such non-identifiable information collected with any identifier attributed to any user who accesses the site unless there is an attempt to damage the site. We retain any personal information pertaining to registered users for as long as is determined necessary for business purposes.

Cookies

Cookies are small files that contain certain pieces of information that a Website creates when you visit the site. There are two common types of cookies, "session cookies" and "persistent cookies". Session cookies store information only for the length of time you are connected to a site and the information is not written or stored on your hard drive. Persistent cookies are written or stored on your hard drive until the expiry date of the cookie, or until you manually delete the cookie from your hard drive. Vubiz, with one exception (noted below) only uses "session cookies" to establish a link between the user / learner and our Web service. The cookie takes the form of a unique session identifier that is issued by the server and maintained within the user's browser. Once the browser is closed, this link is severed and the "cookie" is destroyed – nothing from our service is left on your computer. Learners cannot use Vubiz unless their browser is "cookie enabled". The one instance when Vubiz uses "persistent cookies" is if we wish to make an announcement, such as "The service will be down for maintenance between the hours of 2am and 3pm...." When this happens (once per year at most) we will place a persistent cookie on the learner's machine for the sole purpose of ensuring that message appears only one time and not every time the user visits the site. That cookie would be set to expire when the announcement ends.

E-Commerce

The acquisition of any products or services from Vubiz via e-commerce does not use cookies in any capacity, other than as noted above, to maintain a session link. When paying online for any Vubiz services or products offered online, you will be using the credit card facilities of our Canadian e-commerce provider "InternetSecure" who in turn works with senior Canadian and International financial institutions to accept and manage credit card information. Their privacy policy is available at <http://www.Internetsecure.com/privacy.html>. Vubiz collects and retains only the purchaser's name, address, and e-mail address, as this is required by the e-commerce vendor. This information is only made available to our "channels", i.e. those Vubiz partners and customers that market Vubiz products and services to their constituents. Vubiz and our channels may, from time to time, contact these customers, typically via e-mail, to determine if they wish to acquire new e-commerce products and/or services. At no time does Vubiz or its channels have any access to customer Credit Card information. The e-commerce sales information (name and address) is securely maintained online by Vubiz until it is deemed of no value to Vubiz and/or its channels. These files are not used for any purpose other than to track and reconcile sales on behalf of our channels (and our accountants).

Protection of Children's Personal Information

Vubiz does not knowingly collect any personal information from children (anyone under "legal age" as it is defined within their place of residence).

Accuracy

While Vubiz makes every attempt to ensure that the information we hold about you is accurate, complete and up-to-date, it is in your best interest to promptly inform us of a change of name, address or any other relevant information. Vubiz also provides you with direct means within our site(s) to ensure that your personal information there is correct.

Contact Information

Vubiz will respond to any queries or concerns you may have. Also, to access your personal information or make any changes to your information, please contact the Vubiz Privacy Officer by:

<p>E-mail: privacy@vubiz.com</p> <p>Phone: (905) 815-1204 ext 40</p> <p>Mail: Privacy Compliance Officer Vubiz Ltd. 124 Lakeshore Road West, Oakville, ON, Canada, L6K 1E3</p>
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If you are not satisfied with the response from the Vubiz Privacy Compliance Officer after making a complaint or do not receive a satisfactory answer to a query or concern, you may have recourse to additional remedies under applicable privacy legislation. For further information, please contact the federal Privacy Commissioner or your provincial [Privacy Commissioner](#), as applicable.

Last updated: May 2008