

## Privacy Policy

Last modified: December 19, 2019

### **INTRODUCTION**

ORBIS COMMUNICATIONS INC. and our affiliates and subsidiaries ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes how we collect, use, disclose, and protect the personal information of our customers and website users ("**you**"), describes the types of information we may collect from you or that you may provide when you visit the website [www.outcomecampusconnect.ca](http://www.outcomecampusconnect.ca) or [www.orbiscommunications.com](http://www.orbiscommunications.com) (our "**Website**"), and our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes. To the extent that we store data with third party providers, we and our service providers comply with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

This policy applies to information we collect, use, or disclose about our customers and Website users:

- On this Website.
- In email, text, and other electronic messages between you and this Website and/or others with whom you communicate through the Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this policy.
- Through identifiable inputs and/or uploads or data-pass-throughs that are received or sent to us by Data Sharing Partners.
- NOTICE FOR STUDENT, ALUMNI AND INDUSTRY LINKED USERS: If you are a user who was given access to the site through another organization or entity with whom you are affiliated (i.e. a post-secondary institution; employer; industry association etc); this Privacy Policy does not govern nor apply to that organization's collection, use, or disclosure of personal information from them to us. If you provide or provided information through or to an external organization, and, that information has been provided to us, it has been under the auspices of a Data Sharing Agreement with the presumption that the requisite authority to share that information has been obtained

from you by the external organization. We are not and cannot be responsible for an external organization's collection, use, or disclosure of your personal information; however, if and when that information or data is uploaded or integrated into our system, we will retain and use it pursuant to our terms and obligations herein.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

This policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries).
- Any third party (including our affiliates and subsidiaries), through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates. We will notify you in advance of any material changes to this policy and obtain your consent to any new ways that we collect, use, and disclose your personal information.

#### **INFORMATION WE COLLECT ABOUT YOU**

We may collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information, addresses, scholastic information, contact information, social insurance number (on a voluntary user opt-in basis), and/or any other identifier we may use to contact you online or offline. ("**personal information**").

We provide an opportunity for any user to unsubscribe from our service or opt-out of contact for marketing purposes on an ongoing basis by e-mailing to [unsubscribe@orbiscommunications.com](mailto:unsubscribe@orbiscommunications.com).

- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identified individual, such as meta-data, cookies, internet usage, demographic information, or statistical or aggregated information. Statistical or

aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature.

- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our customer service number.
- **Employment, Industry and Job-related information**, including but not limited any information related to job or employment applications; searches of and responses to job-postings or job descriptions; communications through the website with prospective employers, other partners, or employment related parties herein, including communications related to jobs interviews or scheduling/timing thereof; written responses and submissions for job postings or interviews; employer testing or screening processes and/or responses; resume(s), or curriculum vitae(s), cover letters and/or biographical information provided through the website; and, finally, any pertinent information sought or transmitted through the website.

#### **HOW WE COLLECT INFORMATION ABOUT YOU**

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email, or otherwise.
- **User contributions**. You may also provide information for us to publish or display on public Website areas or transmit to other Website users or third parties.
- **Automated technologies or interactions**, as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- **Third parties or publicly available sources**, for example, our business partners, government or government agencies, colleges, universities, employers and/or industry associations.

#### **Information You Provide to Us**

The information we collect directly from you on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, and or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys, data-input, and/or reporting that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders and/or transactions or tasks. Should the transaction require it, and should the transaction require payment, you may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website and affiliated third parties or partners of the Company.
- Information you seek or input related to employment or job-related searched or data inputs, such as information you may input or share about job or employment applications; searches of and responses to job-postings or job descriptions; communications through the website with prospective employers, other partners, or employment related parties herein, including communications related to jobs interviews or scheduling/timing thereof; written responses and submissions for job postings or interviews; employer testing or screening processes and/or responses; resume(s), or curriculum vitae(s), cover letters and/or biographical information provided through the website; and, finally, any pertinent information sought or transmitted through the website.

You may also provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. We cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that unauthorized persons will not view your User Contributions.

### **Information We Collect Through Cookies and Other Automatic Data Collection Technologies**

As you navigate through and interact with our Website, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical information and may include personal information, and we may maintain it or associate it with personal information we collect in

other ways, that you provide to us, or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.
- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **Third Party Use of Cookies and Other Tracking Technologies**

Some content or applications on the Website, including advertisements, are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content. In addition to helping advertisers reach the right people for their products and services, behavioural advertising helps support our Website so that you can enjoy free content.

## **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To improve our Website, products or services, marketing, or customer relationships and experiences.
- To allow you to participate in interactive features, social media, or similar features on our Website.
- To measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you.
- To connect you with employment and professional development opportunities.
- To measure, evaluate and report upon program success to data-sharing partners
- In any other way we may describe when you provide the information.
- For any other reasonable purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you, as permitted by law. If you do not want us to use your information in this way, e-mail us at [privacy@orbiscommunications.com](mailto:privacy@orbiscommunications.com). For more information, see Choices About How We Use and Disclose Your Information.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

#### **DISCLOSURE OF YOUR INFORMATION**

We may disclose aggregated information about our users without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates, and, to partners or funders such as the Government of Canada; Ryerson University, WhoPlusYou Inc.' and any other data-sharing partner who

is operating under the auspices of a Data Sharing Agreement, including but not limited to prospective employers, industry associations, other post-secondary institutions, career colleges or other entities deemed to have an interest in the data and information.

- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ORBIS COMMUNICATION INC.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by ORBIS COMMUNICATION INC. about our customers and users is among the assets transferred.
- To advertisers and advertising networks that require the information to select and serve relevant advertisements to you and others. We do not disclose data about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users . We may also use such aggregate information to help advertisers target a specific audience. We may make use of the personal information we have collected from you to enable us to display our advertisers' advertisement to that target audience.
- To third parties to market their products or services to you if you have consented to/not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them. For more information, see Choices About How We Use and Disclose Your Information.
- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Website, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our terms of use as found at
  - [www.orbiscommunications.com/termsfuseor](http://www.orbiscommunications.com/termsfuseor)
  - [www.outcomecampusconnect.ca/termsfuse](http://www.outcomecampusconnect.ca/termsfuse).
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ORBIS COMMUNICATION INC. our customers, or others. This includes

exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **TRANSFERRING YOUR PERSONAL INFORMATION**

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

You are welcome to contact us to obtain further information about Company policies regarding service providers outside of Canada. See Contact Information and Challenging Compliance.

By submitting your personal information or engaging with the Website, you consent to this transfer, storage, or processing.

### **CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly. For more information about tracking technologies, see Information We Collect Through Cookies and Other Automatic Data Collection.
- **Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form where we collect your data. You can also opt-out by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [unsubscribe@orbiscommunications.com](mailto:unsubscribe@orbiscommunications.com).
- **Promotional Offers from the Company.** If you have opted in to receive certain emails from us but no longer wish to have your email address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which we collect your or at any other time by logging into the Website and adjusting your user preferences in your account

profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [unsubscribe@orbiscommunications.com](mailto:unsubscribe@orbiscommunications.com). If we have sent you a promotional email, you may unsubscribe by clicking the unsubscribe link we have included in the email. This opt-out does not apply to information provided to the Company as part of a product purchase, product service experience, or other transactions.

**Targeted Advertising.** If you do not want us to use the information collected or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt out by emailing [unsubscribe@orbiscommunications.com](mailto:unsubscribe@orbiscommunications.com).

For this opt-out mechanism to function, you must have your browser set to accept browser cookies.

**Notice to User:** We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of several third-party ad servers' and networks' cookies simultaneously by using an opt-out tool created by the Digital Advertising Alliance of Canada or an opt-out tool created by the Network Advertising Initiative. You can also access these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on your device. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

## **DATA SECURITY**

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers using commercially reasonable security protocol.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards, which any Website visitor can view.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. Should any transaction require or utilize financial information it shall use SSL encryption.

## **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

### **CHILDREN UNDER THE AGE OF 16**

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [privacy@orbiscommunications.com](mailto:privacy@orbiscommunications.com).

### **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

You can review and change your personal information by logging into the Website and visiting your account profile page.

If you want to review, verify, correct, or withdraw consent to the use of your personal information you may also send us an email at [privacy@orbiscommunications.com](mailto:privacy@orbiscommunications.com) to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions include:

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that is about another individual that would reveal their personal information or confidential commercial information.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct information provided, you may contact our Privacy Office at [privacy@orbiscommunications.com](mailto:privacy@orbiscommunications.com).

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use at [www.orbiscommunications.com/termsfuse](http://www.orbiscommunications.com/termsfuse) or via the Outcome Campus Connect platform at [www.outcomecampusconnect.ca/termsfuse](http://www.outcomecampusconnect.ca/termsfuse).

### **WITHDRAWING YOUR CONSENT**

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [privacy@orbiscommunications.com](mailto:privacy@orbiscommunications.com). Please note that if you withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

### **CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account and or through a notice on the Website home page. We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### **FRENCH AND ENGLISH**

There is an English and French version of the Privacy Policy. In the event of a legal dispute, or if there is any ambiguity between the two versions, the English version shall prevail.

### **CONTACT INFORMATION AND CHALLENGING COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

Orbis Communications Inc.  
Privacy Officer  
151 John Street South

Hamilton, ON  
L8N 2C3  
1.905.627.4341

Or via email at [privacy@orbiscommunications.com](mailto:privacy@orbiscommunications.com). We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our designated contact using the information listed above.