

# online

Online Business  
Systems

Policy

POL004 – Privacy  
Policy

 Results. Guaranteed.

# Table of Contents

1.	Introduction and Scope .....	2
1.1.	Introduction .....	2
1.2.	Privacy .....	2
2.	Policy Roles and Responsibilities .....	2
2.1.	Policy Applicability .....	2
3.	Privacy Policy .....	3
3.1.	Information We Collect .....	3
3.2.	How We Use Information .....	5
3.3.	How We Share Information .....	6
3.4.	Cookies and Similar Tracking Technologies .....	6
3.5.	Your Choices .....	8
3.6.	How We Protect Information .....	9
3.7.	Transfer of Information to Other Countries .....	9
3.8.	Retention of Information .....	9
3.9.	Children’s Privacy .....	9
3.10.	Links to Other Websites and Services .....	10
3.11.	Additional Information .....	10
3.12.	Contact Information .....	12

### Revision History

Version	Date	Contact	Purpose
V1.0	April 15, 2022	Steve Levinson, Michael Primeau	Initial draft

# 1. Introduction and Scope

## 1.1. Introduction

This document explains Online Enterprises Inc. doing business as Online Business Systems' ("Online" "we," "us," or "our") Privacy policy. Online's leadership team has committed to these Privacy policies and procedures to protect our and our Clients' Privacy Information Assets, including, confidential collection, usage, sharing, and otherwise processing your personal information when you access or use our websites, products, services, and technologies (together, the "Services") or otherwise interact with us. Please note, this Privacy Policy does not apply to the data or content processed, stored, or hosted by our Clients.

Persons with disabilities may obtain this Privacy Policy in an alternative format, upon request, by contacting us at the appropriate address above. If you are visually impaired, you may access this notice through your browser's audio reader.

## 1.2. Privacy

Online is committed to protecting its Clients', its Users', and its Clients' Clients' privacy. Online's Privacy Policy is located at:

<https://www.obsglobal.com/privacy-policy/>

We may update our Privacy Policy from time to time to reflect changes to our practices, technology, legal requirements, and other factors. When changes are made to this Privacy Policy, they will become effective immediately when published. You can check the "Revision History" legend at the top of this page to see when this Privacy Policy was last revised.

# 2. Policy Roles and Responsibilities

## 2.1. Policy Applicability

This Policy applies to all Online employees, Clients, contractors, and any third parties with access to or control of Online owned or managed information technology assets.

## 3. Privacy Policy

### 3.1. Information We Collect

We collect information about you in a variety of ways depending on the context. Some of the information we collect includes personal information that can be used to identify you. In general, we obtain information from the following categories of sources:

- Information you provide to us directly (such as when you contact us, request support, or sign up for an event).
- Information we automatically collect from you in connection with your use of our Services.
- Information from third-party sources (such as our service providers, business partners, affiliates, or publicly available sources).

The following provides examples of the type of information we collect in various contexts and how we use that information.

Context	Types of Information	Primary Purpose for Collection
Account Information	Some of our Services require you to have an account. We collect your name, contact information (such as your address, phone number or email address), professional information (such as your employer name, address, job title, department or job role), and username and password when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We use this information to perform our contract with you, or your affiliated company, to provide you access to the Services, including to manage your account and send you administrative or account-related communications. We also have a legitimate interest in controlling access to certain Services and maintaining the security and operational integrity of those Services.
Business Client Information	We collect the name, contact information (such as email address, phone number or address), and professional information (such as employer name, address, job title, department or job role) of our business Clients and their employees with whom we may interact.	We have a legitimate interest in managing our business relationships conducting normal business administration functions.
Cookies and Similar Technologies	We use technologies such as cookies, web beacons, pixel tags, and other similar technologies to automatically collect and log information when you access and use our websites and other online services or interact with emails we have sent to you. This may include, without limitation, the type and version of your browser, the length of time that you visit our site, search queries, your click-stream data, the location that referred you to our Services and the average number	Cookies and Similar Technologies

	of pages viewed. We may also collect your Internet Protocol (IP) address or other unique identifiers for the computer, mobile device, technology or other device you use to access the Services. For more information, please read the " <a href="#">Cookies and Similar Tracking Technologies</a> " section below.	
Events and Conferences	If you sign up for and/or attend an event, webinar or conference, we may ask you to provide your name, title, company name, address, phone number and email address.	We use your information to complete your registration. We also have a legitimate interest in providing you with information and services associated with the event or conference.
Inquiries, Comments, and Support	If you contact us to inquire about our products and services, provide feedback or comments, request support, or otherwise communicate with us, we may collect your name, contact information (such as your email address and phone number) and in some cases your company name, city, and region, as well as the contents of your message and any other information you provide to us.	We have a legitimate interest in responding to your questions, comments, and other requests; receiving and acting upon your feedback; and resolving issues.
Location Information	Based on your interaction with the Services, the type of device you use to access the Services, and your device's connectivity, we may collect location-based information including your Internet protocol (IP) address, GPS location, longitude/latitude, city, county, zip code and region, and your location and your smart device's proximity to "beacons," Bluetooth networks and/or other proximity systems.	We use this information to perform our contract to provide the Services. We also have a legitimate interest in understanding our users.
Mailing List	If you sign up to receive communications from us, we collect your email address or postal address.	We share information relating to our company and our Services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our Services.
Surveys	From time to time, we (or third parties acting on our behalf) may administer surveys or solicit reviews and testimonials. If you choose to participate in a survey or provide a review or testimonial, we collect information you provide, which may include personal information. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions and collecting information relevant to our organization in order to, among other things, improve our Services.
Web Log Data	When you visit our websites, our servers automatically gather certain information. This information may include but is not limited to	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other

	<p>your IP address, unique device identifier, date/time stamp, web browser or operating system, address domain name, click-activity, and referring website.</p>	<p>things, we use this information to detect and prevent fraud, illegal activity, and/or the misuse of our websites. We also have a legitimate interest in understanding how visitors interact with our websites to better improve them.</p>
--	---	--

### 3.2. How We Use Information

In addition to the uses described elsewhere in this Privacy Policy, we collect and use information in the following ways:

- **Provide Products and Services:** To provide our Services and to carry out transactions you have requested (such as registrations, subscriptions, purchases, and payments).
- **Support and Improve our Services:** To provide support for, measure use of, analyze performance of, fix errors in, improve, and develop our Services.
- **Marketing:** To send you marketing communications and promotional materials, including information about goods, services and promotions which may be of interest to you.
- **Personalization:** To identify your preferences, and to display content, advertisements, and offers customized to your preferences.
- **Communicate with You:** To respond to or follow-up on your inquiries, comments, or other requests, and to send certain service communications (such as welcome letters, billing reminders, information on technical or service issues, and security announcements).
- **Operate our Business:** To operate, evaluate and improve our business, including developing new products and services; managing our communications; analyzing our Services, sales, Clients, users, and website visitors; conducting research; aggregating and anonymizing data; performing data analytics; undertaking accounting, auditing and other internal functions; performing our obligations and exercising our rights under our agreements; and as otherwise permitted or required by applicable law.
- **Safety and Security:** To detect, prevent, or otherwise address fraud, security, or technical issues; to protect against malicious, deceptive, fraudulent, or illegal activity, including attempts to manipulate or violate our policies, procedures, and terms and conditions; and to protect yours, ours or others’ rights, property, or safety.
- **Your Consent:** We may ask for your consent to use your personal information for a specific purpose that we communicate to you.
- **Comply with Legal Obligations:** To comply with judicial proceedings, court orders or legal processes or to respond to proper governmental request or investigation, and to comply with our legal or regulatory obligations.

### 3.3. How We Share Information

In addition to the specific situations discussed elsewhere in this Privacy Policy, we disclose information in the following situations:

- **With our Service Providers:** We share information with unaffiliated companies or individuals we hire or work with that perform services on our behalf, such as hosting websites, processing and storing data, sending communications, processing payments, providing Client support, analyzing data, providing marketing assistance (including advertising), conducting Client relationship management, and providing training.
- **Where Required or Permitted by Law or Legal Process:** We may disclose information where we believe disclosure is necessary or required (i) by law or regulation, in order to comply with legal process, or in response to requests by law enforcement authorities, government or public agencies or officials, or regulators; or (ii) to exercise, establish or defend our legal rights or to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **In Connection with a Corporate Transaction:** We may share or transfer information in connection with, or during negotiations of, any merger, sale of company assets, financing, acquisition, dissolution, corporate reorganization, or similar event.
- **With Your Consent or at Your Direction:** We share your information with third parties when we have your consent to do so. We may also share your information with other third parties when you intentionally direct us to do so or when you use our Services to intentionally interact with third parties.

Although the sections above describe our primary purpose for collecting and using your information, in many situations we have more than one purpose. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

### 3.4. Cookies and Similar Tracking Technologies

We use cookies, web beacons, pixel tags, and other similar tracking technologies (collectively, "cookies") to collect certain information about your use of our Services. Cookies are small text files that your computer or device saves when you visit certain websites. When you return to the websites that saves cookies on your device—or visit other websites that use the same cookies—the websites recognize such cookies and your browsing device.

#### 3.4.1 How We Use Cookies

We use first-party and third-party cookies for the following purposes:



- To make our Services function properly.
- To provide a secure browsing experience during your use of our Services.
- To prevent fraudulent activity.
- To collect information about your use of our Services to help us improve and optimize our Services.
- To remember your preferences for your convenience.
- To market our Services, including by showing ads or content on our Services or on third-party sites.

### **3.4.2 Types of Cookies We Use**

We use the following types of cookies:

- **Necessary and Functional:** Some technology is necessary for the operation of our Services. Because our use of this technology is needed as part of our Services, it is always active. Note that while you can set your browser to block this type of tracking, doing so may cause some parts of our Services to not function for you.
- **Analytics:** Analytics technology is primarily used to obtain insight in order to improve our Services and may be conducted by us or one of our third-party service providers. We may collect analytics data, or use third-party analytics tools such as Google Analytics, to help us measure traffic and usage trends for our Services and to understand more about the demographics of our users. You can learn more about Google's practices at <http://www.google.com/policies/privacy/partners> and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.
- **Advertising:** Advertising tracking technology, such as behavioral advertising cookies, may be set by us, or by third parties. Among other things, the technology is used to track what parts of our Services and other websites you have visited in order to serve you relevant ads on our Services and on other websites you visit as you navigate across the Internet. It is also used to limit the number of times you see an advertisement, to help measure the effectiveness of advertising campaigns, or to understand your behavior after you view an advertisement. Please understand that if you disable cookies (as discussed below) to prevent such interest-based advertising, you may still see advertisements, but they will not be tailored to your interests.

### **3.4.3 Information We Collect and How We Use It**

Examples of the information we automatically collect through cookies include:

- Network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider.
- Computer and device information, such as device, application, or browser type and version, browser plug-in type and version, operating system, or time zone setting.

- Information about your use of our Services, including clickstream data, your interactions with our Services (such as the web pages you visit, search terms, and the apps and features you use), the pages that led or referred you to our Services, dates and times of use of our Services.

### **3.4.4 How to Manage Cookies**

- If you would prefer not to accept cookies, most browsers will allow you to control what types of cookies you wish to allow, delete, or disable through the browser settings. If you restrict cookies, however, some features and services on our Services may not work properly and you will not obtain the optimum benefit of our websites' functionality or content.
- Certain third parties provide ways to opt out of advertising cookies across multiple sites. You can learn more by visiting the sites of the Network Advertising Initiative (<https://optout.networkadvertising.org>) or the Digital Advertising Alliance (<https://www.aboutads.info>). Please note, opting out of interest-based advertising does not mean you will no longer see advertising online. It does mean that the company or companies from which you opt out will no longer show ads that have been tailored to your interests.

## **3.5. Your Choices**

You may have certain choices regarding your personal information subject to applicable laws, including:

- **Access:** You may have the right to request access to, or a copy of, the personal information we have about you. If required by law, upon request, we will grant you reasonable access to the personal information we have about you.
- **Correction:** We rely on you to update and correct your personal information. You may contact us to request that we update or correct inaccurate or incomplete information we hold about you. Note that we may keep historical information in our backup files as permitted by law.
- **Marketing Communications:** You may opt out of receiving promotional communications from us by following the unsubscribe instructions in those communications. Please note, if you opt out or unsubscribe from marketing communications, we may still send you non-promotional communications, such as service-related and/or transactional communications.

If you would like to exercise any of the above choices, or if you have questions about your rights, please submit your request to us by email using the contact information below.

In some cases, we may limit or deny requests if the law permits or requires us to do so, or if we are unable to adequately verify your identity.

### **3.6. How We Protect Information**

We use reasonable and appropriate measures designed to protect your personal information from unauthorized access, use, disclosure, alteration or destruction. However, no method of transmission over the Internet, or method of electronic storage, is fully failsafe, and we cannot guarantee the security of your personal information. In the event we are required by law to inform you of a compromise affecting your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our Services permit you to create an account. When you do, you will be prompted to create a username and a password. You are responsible for maintaining the confidentiality of your username and password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

### **3.7. Transfer of Information to Other Countries**

By submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States and Canada. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.

### **3.8. Retention of Information**

Typically, we retain personal information for as long as it is required in order to fulfill the relevant purposes described in this Privacy Policy, as may be required by law (including for tax and accounting purposes), or as otherwise communicated to you. How long we retain specific personal information varies depending on the purpose for its use, and we will delete your personal information in accordance with applicable law.

### **3.9. Children's Privacy**

The Services are not intended for children under the age of 18 and we do not knowingly collect personal information from children under the age of 18. Children under the age of 18 should not provide their personal information to us.

### 3.10. Links to Other Websites and Services

We have no control over the privacy practices of websites or applications that we do not own. Any personal information that you provide through third party websites, applications or other means will be governed by the privacy policies applicable to those third parties and mediums.

### 3.11. Additional Information

As required under applicable laws and regulations, this section provides additional details regarding personal information we process.

#### 3.11.1 Categories of Personal Information We Collect, Use, and Disclose

The table below identifies the categories of personal information we have collected in the past twelve (12) months. It also lists the categories of recipients to whom we have disclosed personal information for a business purpose. For more information, including the sources from which we obtain personal information, please see the “Information We Collect” section above.

Categories of Personal Information Collected	Categories of Recipients to Whom Information Was Disclosed for A Business Purpose
<b>Personal Identifiers</b> – this may include real name, alias, postal address, email address, account name, social security number, driver’s license number, passport number or other similar identifiers.	None
<b>Other Identifiers</b> – this may include a device identifier; an Internet Protocol address, or other unique identifier.	None
<b>Commercial Information</b> – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	None
<b>Internet or other Electronic Network Activity Information</b> – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.	None
<b>Geolocation Data</b>	None

<b>Professional or Employment-Related Information</b>	None
<b>Inferences drawn from any of the Information listed above</b>	None

**3.11.2 Business or Commercial Purpose for Collecting and Using Personal Information**

We collect and use personal information for the business or commercial purposes described in the “How We Use Information” section above.

**3.11.3 Sale of Personal Information**

We do not sell personal information.

**3.11.4 Additional Rights Under California Law**

In addition to the choices enumerated under the “Your Choices” section in the Privacy Policy, you may have the right to delete your personal information, subject to certain exceptions, and the right to not be discriminated against for exercising your rights under California law. We do not discriminate against California consumers who choose to exercise their rights under California law. Please note that in many situations we may be unable to honor your deletion request as we must keep your personal information for a certain period of time to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.

If you would like to exercise any of the above choices, or if you have questions about your rights, please submit your request to us by email using the contact information below.

In order to process your request, we must be able to verify your identity to make sure you are the person about whom we have collected personal information or an authorized representative. Depending on the type of request, we may conduct the verification process by email or phone using information that matches our records. The information you must provide as part of the verification process may include name, contact information, state or country of residency. We may also ask for additional information as needed based on your relationship with us.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent

to submit the request on your behalf and verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of (i) a completed Authorized Agent Designation Form indicating that you have authorization to act on the consumer's behalf; and (ii) if you are a business, proof that you are registered with the Secretary of State to conduct business in California. If we do not receive both pieces of information, the request will be denied.

**Do Not Track Features:** Some web browsers incorporate a Do Not Track ("DNT"), or a similar feature, that signals to digital services that a user does not want to have his/her online activity tracked. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, we currently are not set up to recognize or respond to DNT and similar signals.

### **3.12. Contact Information**

If you have any questions, comments, or complaints concerning our privacy practices please contact us by emailing us at [privacy@obsglobal.com](mailto:privacy@obsglobal.com) or writing to us at 200-115 Bannatyne Avenue, Winnipeg, Manitoba R3B 0R3 Canada.