

Privacy Policy

Introduction

We respect your privacy and are committed to protecting it through our compliance with this Policy. This Policy describes the types of information we may collect from you or that you may provide when you visit <https://www.ebasefm.com/> (including any successor URL, sub-domain and/or any syndication of the foregoing, collectively, our “Online Application”) and/or subscribe to and use any of our SaaS-based applications (our “Applications” and, together with our Online Application, our “Online Application”) and our practices for collecting, using, maintaining and protecting and disclosing that information.

Privacy Statement

Our policies and practices have been designed to comply with the Personal Information Protection and Electronic Documents Act (the “Act”) and any other relevant privacy legislation. DMS Technologies Inc. respects the privacy of each individual with whom it comes into contact as a user of the Platform Services. DMS Technologies Inc. will not rent or sell any of your personal information to any organization or individual unless you give us permission to do so.

DMS Technologies Inc. is committed to the following principles with respect to your personal information:

- We take the protection of your information seriously.
- We do not use the personal information of users for any marketing or targeted advertising.
- We store user data on dedicated servers located in Niagara on the Lake, Ontario.
- We have developed comprehensive layered security measures which designed to protect the privacy, security, and confidentiality of your personal information against risks through administrative, technological, and physical safeguards.
- We do not sell your personal information to third parties.
- We do not own your personal information.
- We do not share your personal information with others unless we have your permission to do so and, in some cases, if your organization has approved it.

This Privacy Policy is effective as of March 26, 2021.

Definitions

This section contains a list of terms and their meaning within this agreement.

We, Us or Our

These refer to DMS Technologies Inc. o/a eBASE.

You or Your

These refer to the organization or other legal entity for which you are utilizing our Site and Services.

Online Application

This refers to the collection of online, web-based applications and tools provided by Us.

DMS Technologies Inc. o/a eBASE (“eBASE”, “we”, “our”, “us”) recognizes the importance of your right to privacy and wants you to be familiar with how we collect, use and disclose any personal information that individually identifies you (e.g. name, phone number, e-mail address).

This Privacy Policy explains how we collect, use, disclose and protect your personal information when you use our Online Application (the “Site”) and our services, including but not limited to our electronic publications, newsletters and/or announcements (collectively, the “Services”). This Privacy Policy is incorporated into and forms part of our [Terms of Use](#), which outline the terms and conditions you agree to when using our Online Application and Services. We will only collect, use, and disclose your personal information in accordance with this Privacy Policy.

If you are a minor, you may only use the Online Application and Services and disclose personal information with your parent or guardian’s express consent. Please read this Privacy Policy carefully with your parent or guardian and confirm that they acknowledge and agree to the terms of this Privacy Policy.

By using our Online Application and Services and supplying your personal information, you acknowledge that you have read and understood this Privacy Policy, and you agree and consent to the collection, use, disclosure, and other processing of your personal information as outlined in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Online Application or Services or supply your personal information to us.

Personal Information of Children

We are committed to protecting the privacy of children and we do not knowingly solicit personal information from children under the age of 18. eBASE collects personal information through the Services from a child under 18 only if their school, school district, and/or teacher has agreed to obtain parental consent to use the Services and disclose personal information to eBASE for use with the Online Application and Services. Please do not send us any personal information about yourself or use the Online Application and Services if you are under the age of 18 and have not obtained the consent of your parent or guardian to use the Services. Please do not send us more information than is required to use the Online Application and Services. If you are aware eBASE is collecting information from a child under age 18 without parent or guardian consent, please contact us immediately at info@eBASEfm.com for the purpose of deleting this information.

What Personal Information do we collect?

Personal information means any information about an identifiable individual. Anonymous Data means data that is not associated with or linked to any individual’s personal information or will not easily permit the identification of individuals. This includes data about how users interact with the Services. eBASE does not consider personal information to include Anonymous Data. The types of personal information that we may collect include, but is not limited to:

- your name;
- all content that you create or share in text, images and other media files that you provide on or through the Online Application;
- Services, or Third-Party Systems that are provided on your behalf;
- if required, your phone number;
- your e-mail address; and
- personal information you give us that we did not request.

When you use our Services, we will also know what school you attend and the city and province in which you go to school, and we may combine that information with information we have from your account.

Why Do We Collect Your Personal Information?

We collect, use, and disclose your personal information in order to provide you with our Services. We also collect, use, and disclose your personal information to comply with legal and regulatory requirements and as otherwise may be permitted or required by applicable laws. We will only use the personal information that we collect for the purposes for which it was collected. We collect your personal information for the following purposes and in accordance with applicable laws:

- to provide you with access to our Online Application and Services;
- to establish and maintain commercial relations with you;
- to identify and contact you when you request our Services;
- to respond to your questions that you send by email or through our Online Application;
- to contact you about the Online Application and Services, including notifying you about updates;
- subject to applicable law, to notify you about other Online Application and Services provided by eBASE, which may be of interest to you;
- subject to applicable law, to provide you with newsletters and articles;
- to customize the appearance of the Online Application and Services displayed to you;
- to obtain your feedback regarding our Online Application and Services, including our surveys;
- to track behavioural information on the Online Application to serve similar content upon future visits;
- to improve the Online Application and help us develop new services, modules, tools and Site features;
- to support our business functions such as internal business processes; and to meet any legal or regulatory requirements.

When Do We Collect Personal Information?

We may collect your personal information when you voluntarily provide it to us by using our Services. For example, we may ask you to provide personal information if you:

- use our Online Application and our Services;
- register, update or create an account on our Online Application;
- sign into your account;
- send us a question or comment by email or phone;
- register to receive newsletters, articles and updates about our services; and

- otherwise participate in features of our Online Application and our Services that ask for personal information.

We also collect personal information when your school provides it to us so that that it may be uploaded to the Services and to your account.

Limiting Collection of Personal Information

We limit the collection of personal information to that which is necessary to fulfill the purposes identified in this Privacy Policy and we collect, use, and disclose your personal information in accordance with this Privacy Policy.

Use, Disclosure and Retention of Personal Information

Your personal information will not be used without your consent for purposes other than those for which it was collected or in accordance with applicable laws. From time to time, we may wish to use personal information for new or additional purposes, in which case we will amend the Privacy Policy to include these new or additional purposes, compile and send a notice with the new Privacy Policy to the identified admin contact on file and will obtain your consent through your continued use of our Online Application and Services.

We may generate Anonymous Data from personal information collected through the Online Application and Services by removing information that makes the data personally identifiable to an individual. This includes information about how users interact with certain areas of the Services. We may use this Anonymous Data and aggregated data for any purpose and disclose such data to third parties in our sole discretion.

We retain your personal information only for as long as we need it to fulfill the purposes for which it was collected, to ensure your compliance with our Terms of Service, and to comply with our legal obligations. User account activity is monitored by each individual organization. If a user does not access their account during a set period of time, organizations have the ability to delete/request deletion of set account. Our Active Directory Authentication assist in the deletion and activation of accounts as the organization removes/adds users. Any personal information associated with that account will be removed.

We may also use and disclose your personal information to service providers, data processors and other third parties ("**Third Parties**") under the following limited circumstances:

- to service providers that help with our operations and Online Application and Services including, without limitation, for monitoring and analyzing site activity, and operating and maintaining the Online Application. These service providers and partner companies may only use your personal information for the purposes described in this Privacy Policy;
- when necessary to protect our safety, property or other rights, our representatives, customers and users of the Online Application and Services, including to detect and prevent fraud;
- if we sell or transfer all or a portion of our business or assets to a related company or a third party. Your personal information will remain subject to any pre-existing Privacy Policy unless you

agree to the privacy policy of the company or third party that acquires your personal information;

- with your consent; or
- when otherwise required or permitted by law.

If you are a student, your parent or guardian, as well as your teacher and an administrator from your school and/or school district, may view and access all your personal information, content and activity associated with your account.

Cookies, Web Beacons and Other Similar Technology

As you interact with this Online Application, we may use automatic data collection technology and services that record and collect information that identifies your computer, tracks your use of this Site and collects certain other information about you and your surfing habits. This data collection technology may include cookies, web beacons and other similar devices on this Online Application to enhance functionality and navigation for our visitors.

A cookie is a small data file that is placed on the hard drive of your computer so that your computer will “remember” information when you visit a site. Web beacons and tags are small strings of code that are used in conjunction with a cookie and allow us to record activity on our Online Application. Internet tags, graphic tags and similar web beacon type functions allow us to count the number of users who have visited a particular web page or to access certain cookies. We may use web beacons on this Online Application to count users and to recognize users by accessing our cookies. Being able to access our cookies allows us to personalize this Online Application and improve your experience at our Site. We may also include web beacons in HTML- formatted e-mail messages that we send to determine which e-mail messages were opened. Information tracked through these mechanisms includes, but is not limited to: (i) your IP address; (ii) the type of web browser and operating system being used; (iii) the pages of the Site a user visits; and (iv) other sites a user visited before visiting our Site.

You can set your internet browser up so that you are notified when cookies are stored, you can decide in each individual case whether you want to accept cookies, or you can refuse to accept any cookies. However, if you do not accept cookies, you may be restricted in how you are able to use our Online Application. You can delete cookies which are already stored on your hard disk at any time. You will find more details on how to do this in the operating guide for your Internet browser program.

As described above, you may be able to set your browser to refuse cookies.

Web Analytics

Our Online Application uses third party analytics services such as Application Insights, a web analytics service provided by Microsoft Corporation. (“**Microsoft**”) and Google Analytics, a web analytics service of Google, Inc. (“**Google**”).

We use Application Insights to track telemetry concerned with load, performance and usage metrics, exception reports, and other diagnostic data. Application Insights places a cookie in the browser of the visitor of the web pages which allows for an analysis of your use of the site. The only user data visible in

the diagnostic reports are URLs; and as a best practice our Service does not put any personal data in plain text in a URL.

Google Analytics uses "cookies" to analyze how you use our Site. The information generated by the cookie about your use of our Site (including your IP address) is sent to a Google server in the U.S. and stored there. Google will use this information to evaluate your use of our Site, compile reports on Site activity for our Site operators and to provide other site activity related internet services. Additionally, Google may transfer this information to a third party when required by law or in the case of a third-party processing information on Google's behalf. By using our Online Application, you consent to the processing of data about you collected by Google in the manner described and for the above-mentioned purpose. The consent for collection and storage of data can be withdrawn at any time in the future by clicking on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. To protect your privacy, our Site uses the "Anonymize" function of Google Analytics which works with a shortened form of IP addresses to avoid direct personal identification.

Furthermore, we use the cookies to carry out frequency assessments, page usage assessments and marketing assessments. For the aforementioned assessments, we utilize this cookie information without a link to your personal information, so it is completely anonymous.

You can set your internet browser to prohibit the installation of cookies that are utilized by both Applications Insights and Google Analytics. However, if you do not accept cookies, you may be restricted in how you are able to use our Site.

Any dispute arising between you and eBASE with respect to privacy is subject to the terms and conditions of use and this Privacy Policy, including limitations on damages, arbitration, and application of the laws of the Province of Ontario. We reserve the right to change this Privacy Policy at any time by posting the policy changes on our website. Site visitors are advised to periodically check this website for such changes.

Location of Data

Our production servers are hosted in a Data Centre located in Niagara-on-the-Lake, Ontario. All offsite backups are transmitted over encrypted VPN to a second location in St. Catharines, Ontario. We do not house data or have service agreement with any firm outside of Canada. eBASE is accessible through the secured portal from any country in North America. We excluded some countries from our Geofence such as China, Russia and India.

Security

We maintain technical, physical, and administrative security safeguards to protect your personal information against loss, theft, and unauthorized access. Any personal information that you provide to us is exchanged on a secure server. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we are committed to protecting your personal information, we cannot ensure or warrant the security of any information you provide to us.

We take reasonable steps to verify your identity before granting you access to your account on our Online Application, however, you are solely responsible for maintaining the secrecy of your username,

password and any other account information. We also take reasonable steps to ensure that our employees are aware of the importance of maintaining the confidentiality of personal information and that unauthorized persons do not gain access to personal information that we have disposed of or destroyed.

Individual Access and Accuracy of Personal Information

You may request access to your personal information which we may hold by contacting us at the contact information set forth below, and we will respond within the time periods provided for under applicable laws. We will need to verify your identity before providing you with the personal information we hold about you. There is no cost for these access requests unless you require copies of records. We may not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your personal information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so.

You may request to update and change your personal information at the contact information set forth below. When possible, we shall correct or complete any personal information which you advise us is inaccurate or incomplete. Where appropriate, the amended information shall be transmitted to third parties having access to such information. If you have any concerns about your information that was provided by your organization, school, school district and/or teacher, please contact these parties directly.

Electronic Communications

We comply with Canada's anti-spam legislation (CASL) and we will not send you electronic communications in contravention of this law. As part of signing up to receive the Services, you may have also opted in to receive email communications from us. If you opted-in to receive such communications, we may use the information to: communicate with you regarding our products, Services and promotions; provide you with other information that you request; and/or improve our product and service offerings.

You will always have the opportunity to "unsubscribe" from receiving any of our e-mail or other communications at any time and we will ensure that our e-mails include instructions on how to unsubscribe if you no longer wish to receive future e-mails from us. We provide an on-going opportunity to unsubscribe or opt-out of contact by us by accessing our Site or by e-mail to info@ebasefm.com or by calling us at 1-905-937-3838.

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under applicable law; (ii) to send you notices of changes to our Privacy Policy; or (iii) to receive service-related messages.

Changes to this Privacy Policy

We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. We will send a Privacy Policy change email notice to the identified admin contact on file and will obtain your consent through your continued use of our Online Application and Services.

We will post the most current version on our Site and we will indicate at the top of this page the date this Privacy Policy was last revised. Your continued access or use of this Online Application, Site or Services after any such changes constitutes your acceptance of the Privacy Policy as revised.

Your Consent to the Terms of this Privacy Policy

By using our Services and providing us with your personal information, you agree that eBASE may collect your personal information and you voluntarily consent to the collection, use, disclosure, and transfer of your personal information in accordance with this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use our Online Application or our Services or provide us with any personal information. If you do not understand the nature, purpose, and consequences of us collecting, using, and disclosing your personal information, please do not use our Online Application or our Services or provide us with any personal information, and contact us at the contact information set forth below so that we can address your questions or concerns.

Subject to legal and contractual requirements, you may refuse or withdraw your consent for certain purposes identified in this Privacy Policy at any time by contacting us at the contact information below. If you refuse or withdraw your consent, you acknowledge that we may not be able to provide you or continue to provide you with certain services or information, which may be of value to you.

How to Contact Us

We welcome your feedback. If you have questions, comments, or concerns about this Privacy Policy, or would like to do any of the following:

- see your personal information that you have already sent us so that you can correct, update or delete it from our files;
- ask that we not send you electronic communications or otherwise contact you; or
- report any violation of this Privacy Policy,

Please contact us at info@ebasefm.com or by calling us at 1-905-937-3838.