

## Website Privacy Policy

Last modified: September 15, 2022

### Introduction

Simplex Legal LLP ("Simplex" or "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 our website at [www.simplexlegal.ca](http://www.simplexlegal.ca) ("Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Simplex only collects, holds, and uses personal information for the purposes for which it was provided to us, related purposes or as permitted or required by law. This policy applies to personal data which is collected and/or used by Simplex.

### Application

This policy applies to information we collect:

- On this Website;
- In email, text, and other electronic messages between you and this Website;
- Through marketing communications unrelated to requests for services from Simplex;
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website; and
- When you interact with our advertising and applications on third party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Simplex offline or through any other means, including on any other website operated by Simplex; or
- Any third party including any entity with which we are affiliated, including through any application or content (including advertising) that may link to or be accessible from or on the Website

By accessing or using this Website, you agree to this policy. Please read it carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. This policy may change from time to time (see Changes to Our Privacy Policy below). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features/register on the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your full name, address, telephone number, email address, or any screen name

or user name you may use. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [privacy@simplexlegal.ca](mailto:privacy@simplexlegal.ca).

### Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, social insurance number or any other information the Website collects that is defined as personal or personally identifiable information under an applicable law/any other identifier by which you may be contacted online or offline ("personal information");
- About you but individually does not identify you, including non-personal information such as demographic data to analyze and develop our marketing strategy. We use non-personal information to determine how you found out about us, what your interests are regarding our services, and how to further improve our site and our service towards you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies; and
- From third parties, for example, our business partners.

### Information You Provide to Us

The information we collect 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, requesting further services, or when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us;
- Personal information used primarily for evaluating job candidates, profiling prospective clients, building our mailing list for information distribution, or to contact a user in connection with that user's inappropriate use of our Website;
- Responses to surveys that we might ask you to complete for research purposes; and
- Search queries on the Website.

You also may provide information to be published or displayed ("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.

Although we limit access to certain pages, you may set certain privacy settings for such information by logging into your account profile however, please be aware that no security measures are perfect or impenetrable.

### Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use 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; and
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include personal information or we may maintain it or associate it with personal information we collect in other ways 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; and
- 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 as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see the "Choices About How We Use and Disclose Your Information" section of this policy.
- Web Beacons. Pages of our the 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 us 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).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or that you provide to us.

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

Some content or applications on the Website 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 (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see the "Choices About How We Use and Disclose Your Information" section of this policy.

### 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 any other purpose for which you provide I;
- To notify you about changes to our Website or any products or services we offer;
- To allow you to participate in interactive features on our Website;
- To evaluate job candidates, profile prospective clients, or build our mailing list for information distribution;
- To contact a user in connection with the user's inappropriate use of our Website;
- In any other way we may describe when you provide the information; and
- For any other purpose with your consent.

We may also use your information to contact you about our own and third party services that may be of interest to you. If you do not want us to use your information in this way, you may opt out from receiving such communication by following the hyperlink included in our email correspondence transmissions. For more information, see the "Choices About How We Use and Disclose Your Information" section of this policy.

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 do not sell, rent, share, or otherwise dispose of the personal information collected on our Website to third parties. We may disclose your personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request. We may also share non-personal information with third parties.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliated entities;
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- 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 Simplex's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Simplex about our Website users is among the assets transferred;
- 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 the "Choices About How We Use and Disclose Your Information" section of this policy.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the share 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; and
- For any other purpose 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:

- To enforce or apply our [Terms of Use](#); and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Simplex, our clients, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### 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 our Website may then be inaccessible or not function properly.
- **Disclosure of Your Information for 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 selecting opt-out in our marketing email communications.
- **Promotional Offers from Simplex.** If you do not wish to have your email address/contact information used by Simplex to promote our own or third parties' services, you can opt out by selecting opt-out in our marketing email communications.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to

deliver advertisements according to our advertisers' target-audience preferences, you can opt out by selecting opt-out in our marketing email communications.

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. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### Accessing and Correcting Your Information

If you have a direct relationship with Simplex and wish to correct your information which may have been collected, please send an email to [privacy@simplexlegal.ca](mailto:privacy@simplexlegal.ca).

### Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

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 our Website.

### Changes to Our Privacy Policy

If we later change our Website Privacy Policy, we will post those changes on our homepage so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

### Questions and Complaints

For general questions about the collection of personal data by Simplex or to file a complaint, please contact Simplex:

#### **Simplex Legal LLP**

[privacy@Simplexlegal.ca](mailto:privacy@Simplexlegal.ca)

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.

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](#).