

Espial Website Privacy Policy

Espial Group, Inc. and its subsidiaries (collectively "Espial", "we", or "us") are committed to protecting your privacy and providing you with a positive experience on our website and in using our services and solutions. We commit to be transparent about the data we collect about you, how it is used, and with whom it is shared.

This Privacy Statement applies to the Espial website. It describes how we handle personal information and the choices available to you for how we collect, use, and access your information. It also explains the available options for you to see, update and correct your personal information. Additional information on our personal information practices may be provided in other supplemental privacy statements, or notices provided prior to or at the time of data collection. In the case where an additional notice or specific privacy policy is presented at time of data collection, it will be considered the final policy.

Collection of Your Personal Information

We may collect personal information about you as you use Espial's products and services. "Personal information" may include your name, address, email address, phone number, login information (user name, password), marketing preferences, IP address, or social media account information.

For Users of Espial Elevate

If you are a user of Espial Elevate (formerly Whole Home Solutions), then the data we collect and the ways that we use it are described in the [Espial Elevate Privacy Policy](#).

For Users of our Website

In some instances, Espial and the third parties we work with automatically collect data through cookies, web logs, web beacons, and other similar applications. This information is used to better understand and improve the usability, performance, and effectiveness of the website and to help tailor content or offers for you. Please read the "Cookies and Other Web Technologies" section below for more information.

We may also gather data from you, including personal information, as you use our website: for example, when you subscribe to a newsletter, apply for a job, download product information or contact us via our contact form.

If you choose to provide Espial with a third party's personal information (such as name, email, and phone number) as part of any data you share with us, you represent that you have the third party's permission to do so. Examples include forwarding a friend's resume or their contact information as part of a job referral.

If your contact details have been provided to Espial by a third party, you can unsubscribe from any future broadcast email communications by following the link provided in our email to you or by contacting us as described below.

Uses of Your Personal Information

We use your personal information in several ways to provide information and services tailored to your needs. Some of the ways we use your personal information include:

- Delivering service and product information you have requested;
- Improving and personalizing our website, newsletters and other communications;
- Sending email to you that is related to parts of our business that you may be interested in, including for marketing or customer satisfaction purposes.
- To follow up with you after correspondence (email or phone inquiries)
- To review and follow up on applications or referrals for open employment positions at Espial.

You can change your communication preferences at any time. See below for how to tell us about your communication choices.

Access to and Accuracy of Your Personal Information

You have several rights relating to your personal data that we hold about you. These are:

1. You have the right to object to receiving any marketing communications that we may occasionally send to you.
2. You may request access to any personal data that we hold about you.
3. You have the right to ask us to correct any errors or omissions in personal data that we hold about you
4. You have the right to request that we delete any personal data we hold about you where it is no longer necessary for us to retain it.

We do not use your information in any automatic decision-making process that may affect your rights.

We want to make sure that any information we hold about you is accurate and up-to-date, and we need your help to do so. If you would like to access, correct, suppress, or delete your personal information, please feel free to contact us directly using one of the ways described below. If we are unable to honor your request for legal or regulatory reasons, we will provide you with an explanation of the rationale.

Espial provides a variety of information about our company and solutions. You can tell us about your communication preferences through the following methods:

- By following the link in our email communications to unsubscribe from that mailing or from our email system.
- By contacting us as described at the end of this privacy policy

Please note these choices do not apply to service notifications or other required communications related to our solutions that are sent for customer care purposes. You may receive these periodically until you stop using or cancel the solution in accordance with its terms and conditions.

By using our website or otherwise providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use. For example, if we learn of a security breach in our systems, we may attempt to notify you of any data loss.

Sharing Your Personal Information

We will share your personal information with our partners only when necessary for the purposes of operating our business; and delivering, improving, and customizing our solutions.

We may share personal information in the following ways:

- With business partners, service vendors, or contractors to provide a requested solution, service or transaction. Examples include, but are not limited to: processing of orders, hosting workshop registration, assisting with sales-related efforts or post-sales support, and providing customer support.
- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.
- In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation or legal process.
- With law enforcement officials, government authorities, or other third parties as necessary to comply with legal process or meet national security requirements; protect the rights, property, or safety of Espial, its business partners, you, or others; or as otherwise required by applicable law.
- In aggregated and/or anonymized form which cannot reasonably be used to identify you.
- If we otherwise notify you and you consent to the sharing.

Security of Your Personal Information

We protect the personal information entrusted to us and treat it securely in accordance with this Privacy Statement, and industry best practices. We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

This includes physical, administrative, and technical safeguards designed to protect your personal information from unauthorized access, use, or disclosure. Your personal information is contained behind secured networks. It is only accessible by a limited number of persons who have special access rights to

such systems. They are required to keep the information confidential. In addition, all personal information you supply is encrypted via Secure Socket Layer (SSL) technology.

We also contractually require that our suppliers protect such information from unauthorized access, use, and disclosure. The Internet, however, cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any personal information you provide to us.

Retention of Personal Information

We will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information only as necessary for the purposes described here, or to meet our legal obligations, resolve disputes, protect our assets, and enforce our agreements.

Use of Cookies and other Web Technologies

Like many websites, Espial uses automatic data collection tools, such as cookies, embedded web links, and web beacons. These tools collect certain standard information that your browser sends to our website. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

We use cookies to:

- help us understand your preferences based on previous or current site activity, which enables us to provide you with an improved experience.
- Compile aggregate data about site traffic and site interactions to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.
- We allow you to turn cookies off when you reach our website. Please note that if you turn cookies off, some of the features that make your site experience more efficient may not function properly.

You can find the list of cookies used on our website at: <https://espial.com/legal>

We also collect information about:

- Your Internet Protocol (IP) address. This is a number automatically assigned to your computer or device whenever you connect to the Internet. It is a unique address assigned by your Internet service provider or IT department on a TCP/IP network. Among other things, the IP address allows web servers to locate and identify your device.

- Clickstream behavior. This includes, for example, the pages you view and the links you click. These tools help make your visit to our website easier, more efficient, and more valuable by providing you with a customized experience and recognizing you when you return. Get more information about how we use automatic data collection tools, such as cookies and widgets.

Some web browsers may give you the ability to enable a "do not track" feature that sends signals to the websites you visit, indicating that you do not want your online activities tracked. This is different from blocking or deleting cookies, as browsers with a "do not track" feature enabled may still accept cookies.

No industry standard currently exists on how companies should respond to "do not track" signals, although one may develop in the future. Espial's website does not currently recognize and respond to "do not track" signals. If we do in the future, we will describe how in this Privacy Statement. Learn more information about "do not track".

Children's Privacy

Espial encourages parents and guardians to take an active role in their children's online activities. Espial does not knowingly collect personal information from children without appropriate parental or guardian consent. If you believe that we may have collected personal information from someone under the applicable age of consent in your country without proper consent, please let us know using the methods described in the "Access to and Accuracy of Your Personal Information" section and we will take appropriate measures to investigate and address the issue promptly.

Consent to Transfer, Processing and Storage of Personal Information

As Espial is a global organization, we may transfer your personal information to Espial in Canada or to any Espial subsidiary worldwide, or to third parties and business partners as described above that are located in Canada and the United States. By using our website and solutions or providing any personal information to us, where applicable law permits, you consent to the transfer, processing, and storage of such information outside of your country of residence where data protection standards may be different.

Linked Websites

We may provide links to other third-party websites and services that are outside our control and not covered by this Privacy Statement. We encourage you to review the privacy statements posted on those websites (and all websites) you visit.

Changes to our privacy policy

Changes to the Privacy Policy apply to your use of our Services after the “effective date.” Espial can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may request the deletion of your data.

You acknowledge that your continued use of our Services after we send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

Contacting Us

If you have any questions about our privacy policy, wish to exercise your rights to your data as described above, or make a complaint about how we process your data, please contact us using one of the following methods:

- By emailing mydata@Espial.com
- By mail to Carl Smith, CFO, Espial, 200 Elgin Street, Suite 1000, Ottawa, Ontario, Canada, K2P 1L5.

Making a privacy complaint

1. **How to complain.** You may make a complaint by emailing us at data-complaints@espial.com or by writing to: GDPR, Espial, 200 Elgin St, Ste 1000, Ottawa ON, K2P 1L5, Canada. Any complaints that you made are treated confidentially. To process your complaint, please provide the following information:
 - a. Name
 - b. Contact details
 - c. Nature of complaint
 - d. Have you already contacted anyone at Espial regarding this issue?
2. **Acknowledgment.** When we receive your complaint, we will confirm this within 3 working days using the contact details you provide. As part of this, we will provide you with the contact details of the person who is dealing with your complaint.
3. **Investigation.** We will use the information you provide to investigate the complaint. We will attempt to complete this investigation within 30 working days - if it is likely to take longer, we will notify you.
4. **Taking action.** Based on our investigation, we may decide to take appropriate action to address your complaint.
5. **Responding.** When we have investigated your complaint, we will contact you and tell you the results of our investigation, along with any action we have taken to address your complaint. If we believe that no action is needed, we will tell you why.
6. If you are not happy with our response, please contact Carl Smith, either by email at csmith@espial.com or at the postal address above, to request that your complaint is reviewed.
7. If you are still not happy following this review, please contact:
 - a. The data protection authority in your country (for residents of EU countries)
 - b. Office of the Privacy Commissioner of Canada (for residents of Canada)