



RESOLVER INC. PRIVACY STATEMENT

Ver.1.0.0a
Last Updated: 2016.DEC.01

This Privacy Statement (the “**Statement**”) governs all aspects of how Resolver Inc. (“Resolver”, “We”, “Us”) collects, uses, maintains and discloses personal information from all users (“Users”, “You” or “Your”) of its corporate website and its software.

Resolver values Your Privacy

Resolver is committed to protecting the confidentiality of all information entrusted to it by Users. Resolver has prepared this Statement to inform Users of our policy and practices concerning the collection, use and disclosure of Personal Information.

Personal Information that Resolver collects.

Resolver, from time-to-time, may collect personally identifiable information (“**Personal Information**”) from Users. This includes name, address, phone numbers, email addresses that You provide, information collected electronically about how You use our corporate website, via cookies or our software. “Cookies” are files or pieces of information that may be stored in Your computer’s hard drive when You visit our corporate website or use our software. Cookies are also used to remember that You may have already provided Personal Information to Us and as a result, they help speed up Your future activities when accessing our website or our software. Resolver does not share Personal Information obtained through cookies with any third parties.

Most Internet browsers are initially set to accept cookies. If You do not wish to accept cookies, You can set Your Internet browser to refuse cookies or to alert You when cookies are being sent.

In some instances, You may have received a unique client ID and created a password in order to use the secure portions of its corporate website or software. You are requested not to divulge Your client ID or password to anyone other than Resolver personnel and then only for the purpose of permitting them to provide service to You.

In addition to Personal Information You provide and cookies, Resolver may collect other information about Your visits to our corporate website and your access to our software. For example, We may collect information about Your computer, such as Your IP address; the type of Internet browser You are using; the type of computer operating system You are using; or the domain name of the website from which You linked to our corporate website or our software. This information: (a) will not be linked to Your Personal Information and will only be collected in the aggregate in connection with all the Users of our corporate website for planning, forecasting and/or evaluation purposes; and (b) may be linked to Your Personal Information when using our software.

Please note that this Statement does not cover aggregated data from which the identity of an individual cannot be determined. Resolver retains the right to use aggregated data in any way that it determines appropriate.

Resolver has no control over the content of third party websites that may be identified on the Resolver corporate website or, if applicable, accessed through hyperlinks.

Your Consent

Your provision of Personal Information to Resolver means that You agree and consent that Resolver may collect, use and disclose Your Personal Information in accordance with this Statement. If You do not agree with these terms, You are requested not to provide any Personal Information to Resolver. Certain services can only be offered if You provide Personal Information to Resolver or You may not be able to access any Resolver software. Consequently, if You choose not to provide Us with any required Personal Information, Resolver may not be able to offer You certain services or You may not be able to access the any Resolver software.

How Resolver uses Personal Information

Resolver may, from time-to-time, use Personal Information collected through its corporate website and its software to: (i) provide Users with a product or service that has been requested including access to Resolver software; (ii) contact Users directly regarding products and services offered by Resolver and its trusted affiliates and partners; (iii) understand User preferences in order to enhance Users’ experience with Resolver and such affiliates and partners; and (iv) research the effectiveness of corporate website and the marketing, advertising and sales efforts of Resolver, its trusted affiliates, independent contractors and business partners.

Resolver's use of Personal Information is limited to these purposes. Unless permitted by law, no Personal Information about a User is collected, without first obtaining the consent of the individual to the collection, use and dissemination of that information.

Disclosure of Personal Information

Resolver will use all information collected from their Users for internal purposes only. Resolver may disclose Personal Information of Users to organizations that perform services on behalf of Resolver ("**Service Providers**"). Personal Information will only be provided to Service Providers if they agree to use such information solely for the purposes of providing services to Resolver and under the instruction of Resolver and, with respect to that information, to act in a manner consistent with the relevant principles articulated in this Statement. However, Resolver bears no responsibility for any other use of such Personal Information by the Service Providers.

In some situations, Resolver may also disclose Personal Information of Users to organizations that may be partners in promotional activities ("**Promotional Partners**"). In such instances, this will only be done if our Promotional Partners agree to use such information solely for the specific, proposed promotional activity and in accordance with this Statement. Information provided by a Promotional Partner to Resolver will be treated in accordance with this Statement. However, Resolver bears no responsibility for any other use of such Personal Information by that Promotional Partner.

Please note that there are circumstances where the use or disclosure of Personal Information may be justified or permitted or where Resolver is obliged to disclose information without consent. Such circumstances may include:

- Where Resolver believes in good faith that the law requires it;
- Where Resolver believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to protect the rights or property of Resolver and collect any money owing; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, Resolver will not disclose more information than is required. Resolver does not sell or otherwise disclose to third parties any Personal Information that it has obtained.

Maintenance and Security of Personal Information

Resolver retains Personal Information about Users as long as Resolver believes it is necessary to fulfill the purpose for which it was collected. Currently, Resolver holds the Personal Information in North America and Europe. Personal Information about Users that is maintained on our systems is protected using industry standard security measures. However, We cannot guarantee that the information submitted to, maintained on, or transmitted from our systems will be completely secure and transmission of information over the Internet is susceptible to possible loss, misrouting, interception and misuse.

Access to Personal Information

Resolver provides individuals with access to Personal Information held about them.

If an individual believes that their Personal Information of file is not correct, they may request an update of that information by sending a request to the person indicated below. Resolver reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes appropriate. An individual may also request that Resolver delete an individual's Personal Information from Resolver's system and records. However, due to technical constraints and the fact that Resolver backs up its systems, Personal Information may continue to reside in Resolver's systems after deletion. Individuals, therefore, should not expect that their Personal Information would be completely removed from Resolver's systems in response to an accepted request for deletion.

Resolver reserves the right to decline access to Personal Information where the information requested:

- a) Would disclose the Personal Information of another individual or of a deceased individual;

- b) Would disclose business confidential information that may harm Resolver or the competitive position of a third party;
- c) Is subject to solicitor-client or litigation privilege;
- d) Could reasonably result in:
 - i) serious harm to the treatment or recovery of the individual concerned;
 - ii) serious emotional harm to the individual or another individual; or
 - iii) serious bodily harm to another individual;
- e) May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by statute to perform such functions;
- f) Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information; or
- g) Does not exist, is not held, or cannot be found by Resolver.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure. Where information will be disclosed, Resolver will endeavour to provide the information in question within a reasonable time and no later than thirty (30) days following the request.

Resolver will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, Resolver will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information.

To guard against fraudulent requests for access, Resolver will require sufficient information to allow it to confirm the identity of the person making the request before granting access or making corrections.

Amendment of Resolver practices and this Statement

This statement is in effect and was last revised as of **December 1, 2016**. Resolver will from time to time review and revise its privacy practices and this Statement. In the event of any amendment, an appropriate notice will be posted on this site. Statement changes will apply to the information collected from the date of posting of the revised Statement to this site as well as to existing information held by Resolver.

Questions

If You have any questions about the privacy practices of Resolver, or You wish to access Your Personal Information, please contact:

Privacy Officer
Resolver Inc.
400-257 Adelaide Street West
Toronto, ON
Canada

Email: privacy@resolver.com
Tel. 1.416.922.2266
Fax. 1.416.622.9965