

Privacy Policy

Last Updated: July 7, 2024

This Privacy Policy (the “**Privacy Policy**”) describes how Newcomers Union Inc., handles your personal data. We are committed to protecting your personal data and informing you about what we do with it.

Please read this Privacy Policy before using any of our products or services, or providing us with any of your personal data. By using any of our products or services, or otherwise providing us with any of your personal data, you consent to the handling of your personal data in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, do not use our products or services, and do not otherwise provide us with any personal data.

1. Overview of this Privacy Policy

- Definitions
- Why We Collect Personal Data
- What Personal Data We Collect
- How We Collect Personal Data
- Consent and Other Legal Grounds for Processing Personal Data
- Disclosure of Personal Data
- Retention of Personal Data
- Security of Personal Data
- Rights Relating to Personal Data
- Third Party Policies
- Communications with Us
- Personal Data About Other Individuals
- Children
- Changes to Our Privacy Policy
- Contact Us
- Definitions
- Why We Collect Personal Data

2. Definitions

“**anonymized information**“ means information that has been anonymized or aggregated in such a way that there is no serious possibility it can be used to identify an individual.

“**contact information**“ means information to enable an individual at a place of business to be contacted, such as the name, position name or title, business telephone number, business address, business e-mail or business fax number of the individual.

“**community members**“ means anyone who joined our organization as a member

“personal data“ means information about an identifiable individual (e.g., name, mailing address, e-mail address and phone number). Personal data does not include contact information or anonymized information.

“platform“ means online software as a service platform for matching international students and graduates with internships and job opportunities, connecting them with a supportive community, and providing personalized resources for success.

“process “ or “processing“ means any action that a person can take with respect to personal data, including collecting, using, sharing, altering and storing personal data.

“services“ means website, platform and any other products and services provided by the company.

“visitor“ means a person that visits our website or platform.

For the purposes of this Privacy Policy: (a) words importing the singular include the plural and vice versa, and words importing gender include all genders; and (b) where the word “including or “includes is used, it means “including (or includes) without limitation

3. **Why We Collect Personal Data**

We may collect personal data to fulfill the following purposes (the “Purposes“):

- a. to provide our services to you, including:
 - i. to support your use of our services (e.g., opening and managing an account on our platform);
 - ii. to identify your preferences with respect to certain functionalities and features of our platform;
 - iii. to carry out our obligations arising from any agreements entered into between you and us; and
 - iv. with respect to students: with respect to students:
 - A. to create candidate profiles accessible to subscribed employers on our platform’s database; and
 - B. to facilitate recruitment efforts from employers;
 - v. with respect to employers and institutions, and to the extent that the information collected is not considered contact information: to create an account for employers and institutions and their administrative users, as may be applicable;

- b. to respond to your communications with us (e.g., if you send us a message through our platform);
- c. to contact you about updates to the services and service-related communications;
- d. for marketing and promotional offers for other services;
- e. to collect opinions and comments in regard to our services;
- f. for internal statistical and operational purposes in order to better understand how our services are used;
- g. to improve our services, including with respect to security and function; to improve our services, including with respect to security and function;
- h. to investigate legal claims; and
- i. to carry out any other purpose which is disclosed to you and for which you consent, or as is otherwise permitted by applicable law.

4. **What Personal Data We Collect**

Personal data that we may collect includes:

- a. With respect to students: first and last name, e-mail, phone number, resume, and video recording of yourself. Students may also optionally provide demographic information about themselves, such as protected group identification, gender and ethnicity. Student personal data is used to: (i) create a candidate profile on our platform, which will be accessible to employers subscribed on the platform for recruiting purposes; (ii) recommend job postings; and (iii) personalize the students' resource feed offered through the platform.
- b. With respect to employers: to the extent that it is not considered contact information, the first and last name, e-mail and phone number of your contact person.
- c. With respect to institutions: to the extent it is not considered contact information, the first and last name, e-mail and phone number of your contact person.
- d. With respect to all visitors (including students, employers and institutions):
 - i. information about how you use our services (e.g., your length of visits to our platform, and the time and frequency of your visits to our platform);

- ii. information about your computer or mobile device, such as your Internet protocol (IP) address, device ID, browser and operating system type, resolution of your screen, language settings in your browser, referring URLs, and other technical information; and
- iii. any other personal data provided to us.

We do not collect credit card or debit card information. If you make an online payment using such a payment card, your payment card information is collected and processed by our online payment processing service provider.

5. **How We Collect Personal Data**

We may collect personal data from you and any devices that you use when you access and use our services. This happens in two primary ways:

- a. when you submit information to us; and
- b. when we automatically collect information from your use of the services:
 - i. Cookies. We may use cookies and similar technologies to track and analyze user activity in order to improve our services and improve your experience. A cookie is a tiny element of data sent to your browser from a website. The cookie is stored on your hard drive so that your computer or other device may be recognized while you interact with the website.

Most web browsers allow you to modify your settings to notify you when you receive a cookie or to reject cookies entirely. Your computer also provides you with the ability to clear all cookies that have been stored onto your hard drive, should you wish to do so. However, please be aware that you may be unable to access certain parts of the services if you block or disable our cookies. For more information about cookies, please see: <https://www.allaboutcookies.org/>.

- ii. Web Analytics. We may use web analytics services (e.g., Google Analytics) in order to better understand the user experience on our platform, including:
 - A. how you reached our platform;
 - B. the website you came from;
 - C. how long you stayed on our platform;
 - D. what pages you looked at;

- E. how many pages you looked at;
- F. what buttons you clicked;
- G. what browser you are using; and
- H. what device you are using.

Any use of analytics services by us may result in analytics providers collecting certain personal data when you access and use our platform. These third parties may set and access their own tracking technologies (including cookies and web beacons) and may otherwise collect or have access to your device identifier, site usage information, and related information about you.

If you do not wish to participate in web analytics, you may be able to download an opt-out browser add-on. Your web browser may also allow you to set a “Do Not Track“ signal when you use online services. To learn more about “Do Not Track“ signals, visit <http://www.allaboutdnt.com/>. You may also contact us at the “Contact Us“ section below regarding any questions about web analytics services that we may use.

- c. Third Party Data. We may also obtain personal data from third parties. We protect such personal data according to the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the data and applicable laws.
- d. Other Interactions. We may also obtain personal data from you when you otherwise interact with us online or offline, such as when you communicate with us in person, by phone or by e-mail.

6. **Consent and Other Legal Grounds for Processing Personal Data**

- a. General permitted or required to do so by applicable law. Your consent may be express or implied. The type of consent we may rely on in processing your personal data will vary based on your reasonable expectations, the sensitivity of your personal data, and the circumstances surrounding the collection of your personal data. Express consent is when you willingly agree (e.g., orally, in writing, or electronic agreement) to the processing of your personal data for particular purposes. Implied consent is when: (i) you do not expressly give consent, but you rather volunteer personal data for obvious purposes that a reasonable person would consider appropriate in the circumstances; or (ii) you are given notice and a reasonable opportunity to opt-out of your personal data being processed for specified purposes, and you do not opt-out. General. We will not process your personal data without your consent, unless we are permitted or required to do so by applicable law. Your consent may be express or implied. The type of consent we may rely on in processing

your personal data will vary based on your reasonable expectations, the sensitivity of your personal data, and the circumstances surrounding the collection of your personal data. Express consent is when you willingly agree (e.g., orally, in writing, or electronic agreement) to the processing of your personal data for particular purposes. Implied consent is when: (i) you do not expressly give consent, but you rather volunteer personal data for obvious purposes that a reasonable person would consider appropriate in the circumstances; or (ii) you are given notice and a reasonable opportunity to opt-out of your personal data being processed for specified purposes, and you do not opt-out.

- b. European Union. If the General Data Protection Regulation (“GDPR”) is applicable to our services, we may process your personal data on the following grounds, in addition to any other grounds that may be available pursuant to applicable law:
- i. Consent. Where you have given us consent through a statement or clear affirmative action agreeing to the processing of your personal data. For instance: submitting your Personal Data on a form on our platform for a specified purpose.
 - ii. Contract. Where processing of personal data is necessary to perform a contract to which you are a party with us, or which you have agreed to enter with us.
 - iii. Legal Obligation. To comply with a legal obligation to which we are subject.
 - iv. Legitimate Interests. Where the processing of personal data is based on our legitimate interests, provided that these do not override your own interests and fundamental rights. We have legitimate interests in the following:
 - A. to properly operate and deliver our services to you;
 - B. to understand how users engage with our services;
 - C. to improve our services;
 - D. to market our services; and
 - E. to provide customer service, including responses to inquiries and feedback.
- c. Consent. For certainty, by providing us with any of your personal data, you consent to our handling of your personal data pursuant to this Privacy Policy. Some of the personal data you choose to provide us may be considered “sensitive“ in some jurisdictions, such as protected group identification, gender and ethnicity. By choosing to provide this information to us, you consent to our handling of that information as set out in this Privacy Policy.

7. Disclosure of Personal Data

- a. General When we disclose your personal data to third parties, we take reasonable measures to ensure that these third parties implement appropriate technical and organizational measures in accordance with applicable privacy and data protection laws. We minimize the amount of personal data we disclose to what is directly relevant and necessary to accomplish the specified purpose.
- b. Our Services. As part of our platform's functionality, we share student candidate profiles with employers. Employers who are subscribed to the platform are able to browse the candidate database on the platform and invite them to make an application or to have an interview. Employers can contact students directly via e-mail or phone.
- c. Service Providers. We may provide your personal data to third party service providers in order to help us achieve the Purposes. For example, we may use third party service providers to help us: (i) process payments; (ii) analyze usage of our services; (iii) track the effectiveness of our marketing strategies and communications; (iv) assist with the prevention, detection and investigation of potentially illegal acts and security breaches; and (v) collect and process error and crash reports and store data.
- d. Corporate Transactions. We may also disclose or transfer your personal data to affiliates or third parties in the event of a proposed reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or equity, subject in each case to customary confidentiality agreements.
- e. Legal Disclosure. We may disclose personal data if we reasonably believe disclosure is in accordance with or required by any applicable law. This includes the disclosure of personal data where necessary for the establishment, exercise, or defense of legal claims, or as otherwise permitted by applicable law. We will have no liability associated with any such disclosures made in good faith.
- f. International Transfer and Storage. Your personal data may be stored and processed in any country where we have facilities or in which we engage third party service providers. Currently, our platform is supported by Amazon Web Services (AWS) in the Canada-Central region. By using our services and otherwise providing us with your personal data, you consent to the transfer of your personal data to countries outside of your country of residence, which may have different data protection rules than in your country. Such personal data will be subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country. If applicable, we will comply with the GDPR requirements providing adequate protection for the transfer of personal data from the European Economic Area to a third country.

8. Retention of Personal Data

We will retain personal data only as long as necessary to: (a) fulfill the Purposes; (b) protect our legal rights; and (c) comply with applicable law. We will securely delete or anonymize the personal data once it is no longer necessary for us to hold it. We are not responsible for any liability or loss you experience as a result of such disposal of personal data. For certainty, anonymized information and statistical summaries (with all personal data removed) are stored indefinitely.

9. Security of Personal Data

We protect your personal data using appropriate technical and organizational measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. These measures include the following:

- a. Student, staff and employer information, other than images and video, are stored in a MySQL database managed by the Relational Database Service (RDS) provided by Amazon Web Services (AWS). This database instance, and all backups and replicas, are encrypted using the AES-256 encryption. Access to the database is encrypted using SSL/TLS with a SSL certificate installed during database creation. Unencrypted access is disabled. All access to the database instance is restricted via a VPN (Virtual Private Network) to authorized servers. The database cannot be accessed via the Internet.
- b. For any images, video, etc., that are uploaded to our platform, they are stored on AWS S3 service and must, by their nature, be accessible via the Internet.

No method of storage or transmission of personal data is 100% secure. Therefore, we cannot guarantee absolute security. We encourage you to also take steps to protect personal data by, for example, closing all web browsers after using the platform.

10. Rights Relating to Personal Data

- a. General. You have certain rights relating to your personal data, subject to applicable law in each instance:
 - i. Right to be Informed. To know how your personal data is collected, how it is used, and how it is disclosed and stored. This further includes:
 - A. Right to Withdraw Consent. To withdraw your consent to the processing of your personal data at any time. Please be advised that withdrawing your consent to the processing of personal data may impact the provision of the services. For further information on this, please contact us as provided in the “Contact Us“ section below.
 - B. Right to Make a Complaint. To make a complaint about the processing of your personal data.

- ii. Right to Access. To receive a copy of your personal data.
 - iii. Right to Rectification. To request correction of your personal data.
- b. European Union. If the GDPR is applicable to our services, and you are an individual to whom the GDPR applies, then you have the following additional rights relating to your personal data, subject to applicable law in each instance:
 - i. Right to Erasure. To request the deletion of personal data when: (A) you believe it is no longer necessary for the purposes collected; (B) you withdraw your consent or otherwise object to the processing of your personal data; or (C) your personal data was unlawfully processed.
 - ii. Right to Restriction of Processing. To restrict the processing of personal data if you dispute its accuracy or object to its processing.
 - iii. Right to Portability. To request that your personal data be transferred to another organization.
 - iv. Right to Information about Automated Decision Making. To receive information about the basis of any automatic decision making (e.g., algorithms).
 - v. Right not to be Subject to Automated Decision Making. To not be subject to decisions based solely on automated processing, unless this is necessary pursuant to a contract between us.
 - vi. Right to Object to Processing Activities. To object to the processing of your personal data based on our legitimate interests.

If you want to learn more about any rights under the GDPR, you can visit the European Commission's page on Data Protection at https://ec.europa.eu/info/law/law-topic/data-protection_en.

- c. Exercising Your Rights. If you would like to exercise any of your personal data rights, please refer to our "Contact Us" section below. When doing so, please tell us which right you wish to exercise and provide us with contact information to direct our response. Your use of the services may be affected depending on the nature of the rights you seek to exercise.

Subject to applicable law: (i) we may verify your identity before fulfilling requests to exercise any rights; and (ii) we may request additional information if we cannot initially verify your identity, or if we require such additional information in order to properly assess your request. Any personal data that you disclose to us for the purposes of verifying your

identity and/or exercising your rights will solely be used for those purposes.

11. Third Party Policies

This Privacy Policy addresses only the handling of personal data that we collect from you. If you disclose your personal data to others, or if you engage any a third-party sites or services, such third-party's privacy notices and practices will apply.

We cannot guarantee the privacy or security of your personal data once you provide it to a third party and we encourage you to evaluate the privacy and security policies of each such third-party before any such engagement or disclosure.

Our platform may contain links to third party websites, products or applications that are not owned, maintained or operated by us. Any such links are provided solely as a convenience to you and not as an endorsement by us. The Company is not responsible for the content of such linked third-party websites, products or applications, and does not make any representations, warranties or guarantees regarding the content or the privacy practices of such third parties. For certainty, The Company disclaims any liability associated with your access to, use of, download of, or reliance on, such third-party websites, products or applications and their content. If you decide to access, use or download any such third-party website, product, application or content, you do so at your sole risk.

12. Communications with Us

To opt-out of receiving certain communications from us (the "Communications"), you may either contact us as provided in the "Contact Us" section below, or, if applicable, click "Unsubscribe" if such function is supported in the particular Communication (e.g., e-mail). Please note that certain Communications may be necessary for the proper functioning and use of the services, and opting out of those Communications may prevent the proper use of the services.

13. Personal Data About Other Individuals

Before providing any personal data on behalf of another individual, you confirm that you have received all necessary consents and authorizations required from them under applicable law so that we may process their personal data in accordance with this Privacy Policy.

14. Children

Our services are not intended for, nor does The Company knowingly collect information from, children under the age of sixteen (16). If we learn that we have collected personal data from a child under sixteen (16), we will take steps to delete the information as soon as possible. If you are aware of a user under the age of sixteen (16) using our services, please contact us immediately.

15. Changes to Our Privacy Policy

We may amend this Privacy Policy from time to time in our sole discretion, so please review it periodically. Unless otherwise indicated by us, any changes to this Privacy Policy will apply immediately upon posting it to our platform. Your continued use of the services after any changes to the Privacy Policy will be conclusively deemed as your acceptance of the Privacy Policy as amended.

16. Contact Us

If you have any questions about this Privacy Policy, or wish to exercise any applicable rights, please contact us:

Attention: Privacy Officer

Newcomers Union Inc.
192 Spadina Ave,

Toronto, ON M5T 2G7, Canada

info@newcomersunion.com