



Privacy Policy

Last Updated: February 15, 2023

This Privacy Policy ("Policy") explains how FISPAN, and its subsidiaries and affiliates (collectively, "FISPAN" "us" "we" "our") process personal information when you interact with us online, via our websites and apps, and offline, at conferences and events. This policy applies to all of the products, services, mobile and web applications, and website (collectively "Services") offered by FISPAN.

For the purposes of the General Data Protection Regulation (the "GDPR"), FISPAN is the controller of your personal data.

Ownership, Approval and Last Review

Document Owner	Manikant Ramannagari
Document Approver	Maryam Hamidirad
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Version History

Instructions for filling out the version history table:

- Only changes to the content of this document should be recorded in the version history table.
- When the version number changes in this table the version number on the title page must be updated also.

Date (DD/MM/YYYY)	Version Number	Description of Change	Performed By (Job Title)
04/02/2022	V 3.0	Last approved version in Logic Gate	Manikant Ramannagari (Compliance Analyst)
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How We Collect Personal Information

We may collect your personal information:

- **Directly from you.** This includes personal information we collect when you sign up for our newsletter, information you provide when you create an account with us, provide feedback, or otherwise engage with us.
- **From public or third-party sources.** This includes personal information we collect from public sources including, but not limited to, websites that enable social sharing, social media sites, and from our service providers, vendors and suppliers, our affiliates, or other individuals and businesses.
- **From devices you use when you interact with us online.** This includes personal information we collect through our websites and applications and automatically from devices you use to connect to our websites and mobile applications.
- **From our customers that use our Services.** We may process personal information on behalf of our customers when providing them with our Services.
- **From you at in person events.**

What Personal Information We Collect

We may collect the following types of personal information:

- **Contact information,** such as your name, address, email address, telephone number, or other similar identifiers.
- **General demographic information.**
- **Financial and payment information,** such as those needed to deliver the services.
- **Account information,** such as a username and password, and other profile details you choose to provide.
- **Internet usage information,** such as browsing history, search history, IP address, and information regarding your interaction with our online offerings.
- **Inferences,** such as inferences drawn from any of the personal information identified so that we may better understand your preferences.

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- **Professional information**, such as information about your job function and role, title, professional affiliations, and employer.
- **Other personal information you provide**, such as the content of your communications with us, including interactions with us and contacts with us online and in-person.

How We Use Personal Information

We process personal information to provide our services and operate our business.

Generally, we use personal information to:

- **Provide and develop our products and services.** We collect information to provide our services, maintain our websites and apps, and better understand the interests of our customers.
- **Communicate with you.** We may use your information to respond to your inquiries and send you communications regarding our products and services.
- **Research and development and quality assurance.** We use personal information to study, develop, and improve our products and services.
- **Security and fraud prevention.** We may use personal information to monitor, detect, and prevent fraud and improper or illegal activity.
- **Debugging.** We may use your personal information to secure our online services including our network, websites, and applications and to debug our online services.
- **Comply with law.** We may use personal information to comply with our legal and regulatory obligations, to defend ourselves in litigation and investigations, and to prosecute litigations.

We may use personal information for our internal business purposes, such as data analysis, audits, and enhancing our services. We may also use inferences drawn from personal information to create a profile reflecting your preferences so we can tailor our services to you.

We may aggregate, anonymize, and/or de-identify personal information we collect and use it for any purpose, including product development and improvement activities.

How We Disclose Personal Information

We may disclose personal information within our company, with our customers, with our service providers, other vendors and/or affiliates, business partners and collaborators, and other parties at your discretion.

- **Our customers.** We may share personal information where it is required to provide our Services.
- **Service providers.** We may provide personal information to vendors, contractors, business and service partners, or other third-parties who provide services to us including analysis firms, advertisers, payment processing companies, shipping companies, and others.
- **Collaborators.** We may share personal information with collaborators with whom we jointly develop or promote our Services.
- **Government, regulatory, or law enforcement agencies.** We reserve the right to disclose your information to respond to valid information requests from government authorities and judicial requests, to investigate potential fraud, or where otherwise required by law. We may disclose your personal information where we believe the disclosure is necessary or appropriate to comply with regulatory or legal requirements or to protect the safety, rights, or property of ourselves and others and to exercise, establish, or defend our legal rights.
- **In connection with a merger, acquisition, or business transfer.** If we sell all or a part of our company, your information may be transferred to the buyer.

We do not sell personal information or transfer it to third-parties to use for their own benefit.

We may also disclose aggregated, anonymized, or de-identified information to third-parties at our discretion.

Your Privacy Rights and Choices

Depending on where you reside, you may have certain rights and choices regarding our processing of your personal information. These include:

- The right to know the categories and/or specific pieces of personal information collected about you, including whether that personal information is sold or disclosed and with whom it was shared;
- The right to access a copy of the personal information we retain about you;
- The right to request deletion of your personal information; and
- The right to correct your personal information

We will verify your identity in connection with any requests and take steps designed to ensure that only you or your authorized representative can exercise these rights. If you are an authorized agent making a request, we may require and request additional information to verify you are authorized to make the request.

There may be situations where we cannot grant your request. Where we deny your request in whole or in part, we will take steps to inform you of the denial and provide an explanation of our actions and the reasons for the denial.

We will not restrict or deny you access to our products and services because of the choices you make in connection with your personal information, but please note, certain choices may affect our ability to deliver our services. For example, if you ask us to delete your email address, we will not be able to send you emails about our services and offerings.

You may exercise any of your rights in relation to your personal information by contacting us using the details provided in the “Contact Us” section below.

Your Marketing Preferences

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If you no longer wish to receive marketing materials from us, you may opt-out of receiving such materials. You may unsubscribe from receiving marketing or other commercial emails from us by following the instructions included in the email. We will work to comply with your request promptly.

However, even if you opt out of receiving such communications, we may need to continue to send you certain non-marketing communications (such as information about changes to our Privacy Policy or Terms of Use).

Cookies and Automated Tools

We, our service providers, and our business partners may also collect certain information about the use of our online services by automated means, such as cookies, web beacons, and other technologies.

We, our service providers, and business partners may collect information about users' online activities over time and across third-party websites. Because there is not yet a consensus on how companies should respond to web browser-based do-not-track ("DNT") mechanisms, we do not respond to web browser-based DNT signals at this time.

The information that may be collected by automated means includes:

- URLs that refer users to our online services
- Search terms used to reach our online services
- Details about the devices that are used to access our website and apps (such as IP address, browser type, and operating system information)
- Details about users' interaction with our website and apps (such as the date, time, frequency, and length of visits, and specific pages accessed during the visits)

Web browsers may offer users of our online services the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of our Services may not function correctly.

Children's Information

Our services are not directed to children under the age of 18. If you are under the age of 18, please discontinue the use of our services and do not provide us with personal information of any kind. If we learn that we have collected personal information from a child under the age of 18, we will endeavor to delete that information.

Third-Party Sites

FISPAN's website provides links to external sites as a convenience and for the interest of the user. The use of this link does not imply FISPAN's endorsement of their privacy practices and this Privacy Policy does not apply to them. It would be best to familiarize yourself with the privacy policies provided by the owners of these third-party sites before submitting any personal data to them.

Security

We take precautions to protect your information. However, the confidentiality of information transmitted over the Internet cannot be guaranteed. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the top of your web browser, or by looking for "https" at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

We have put in place procedures to deal with prevention of personal information. If a

personal data breach is suspected, we will notify our clients and any applicable parties of a breach where we are required to do so.

Transfer of Personal Information Between Countries

Any information you provide to FISPAN may be stored and processed, transferred between, and accessed from other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, FISPAN will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is processed.

Shine the Light Disclosure

We do not share personal information as defined by California Civil Code § 1798.83 (the “Shine the Light law”) with third-parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law by sending an email to privacy.officer@fispan.com. Any such request must include “Request for California Privacy Information” in the subject line and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

Updates

Please review this policy periodically as we may revise it without notice. We will post any changes on this page and indicate the date this Privacy Policy was last revised. You may read a current, effective copy of this Privacy Policy at any time by visiting this page.

Contact Us

If you would like to contact FISPAN about this Privacy Policy you may contact us any time through this website or via telephone at 604-424-9090 or privacy.officer@fispan.com.

Suite 250, 355 Burrard Street, Vancouver, BC, V6E 2G8

European Residents

If you are a European Resident, defined for the purposes of this Privacy Policy to include residents of the European Economic Area (EEA), United Kingdom, and Switzerland, you have certain rights and protections under the law regarding the processing of your personal information. For more information about your rights and protections, please see the “Your Rights and Choices” sections above.

Legal Basis for Processing

If you are a European Resident, we process your personal information when:

- We need to use your personal data to perform our responsibilities under our contract with you (e.g., processing payments)
- We have a legitimate interest in processing your personal data. For example, we may process your personal data to conduct data analytics and to provide, secure, and improve our products and services
- We need to do so to comply with a legal obligation to which we are subject
- We need to do so to protect your vital interests or those of others
- We have your consent to do so, which you may withdraw at any time

Questions or Complaints

If you are a European Resident and have a concern about how we process personal data that we are not able to resolve, you have the right to lodge a complaint with the data

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privacy authority where you live. For contact details of your relevant local Data Protection Authority, please see the European Commission directory [here](#).

If you are a resident of Switzerland, please see the directory [here](#).