

FIRETRONICS PRIVACY POLICY

LAST UPDATED: April 28, 2020

At Firetronics 2000 Inc., privacy is of great importance to us. Firetronics is committed to the protection of the personal information of our clients and their customers, as well as other individuals whose personal information is entrusted to Firetronics.

Policy Contents:

1. Accountability for Your Privacy
2. Personal Information and How We Collect It
3. Using Personal Information
4. Sharing Personal Information
5. Keeping Personal Information Safe
6. Accessing Personal Information
7. How Long We Keep Personal Information
8. Our Privacy Complaint and Breach Management Process
9. External Links and Social Media
10. Changes to this Policy
11. Getting in Touch

1. Accountability for Your Privacy

Firetronics takes full responsibility for the management and confidentiality of personal information. Personal information is collected, accessed, used, shared and stored in accordance with the Canadian *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c.5 and any applicable provincial privacy laws that may apply to Firetronics from time to time. Firetronics also respects the privacy best practice principles contained in the Canadian Standards Association *Model Code for the Protection of Personal Information*, CAN/CSA-Q830-96.

Firetronics has appointed a Privacy Officer who oversees compliance with privacy laws and best practice. The Privacy Officer's duties include:

- Developing and, on a regular basis, reviewing Firetronics policies and practices to ensure consistent and effective implementation;
- Ensuring all staff are trained on privacy best practices and are aware of the importance of safeguarding any personal information that they are privy to;
- Ensuring that all inquiries and complaints relating to privacy are appropriately handled; and
- Requiring that all third parties to whom Firetronics provides access to personal information adhere to appropriate standards of care in managing that information.

2. Personal Information and How We Collect It

'Personal information' is any factual or subjective information, recorded or not, about an identifiable individual. This includes names, personal contact information, demographic

information, geolocation or any other personal details if shared with Firetronics. Some of the information collected by Firetronics is business confidential information about our business customers, such as billing information. We respect the confidentiality of this information and safeguard it just as we do personal information.

Limited personal information is collected by Firetronics in several ways, such as when logging emergency contact details of building representatives, or when provided to operators in the context of delivering answering services to clients. In other contexts, personal information is accessible to Firetronics but not stored on our systems, such as when managing support and service tickets on a client's systems.

Most of the personal information collected by Firetronics is provided directly by the individual data subject. Examples of indirect collection of metadata by Firetronics includes the timestamp of a call handled by our answering service, or the geolocation of panic button products offered by Firetronics.

There may be instances where the law permits the collection, use or disclosure of your personal information without your consent, for example in the context of a court order or when requested by law enforcement in the context of a legal investigation.

3. Using Personal Information

We collect and/or use personal information for the following specific purposes:

- To contact those listed for a property's fire and security monitoring systems to notify them of alarms or schedule service;
- To provide after hours answering services to our clients or their customers;
- To assist our clients with intake, management and closure of service tickets;
- To provide mobile panic device monitoring in order to assist our clients in protecting their employees during an emergency; and
- To meet auditing, legal and regulatory processes and requirements.

4. Sharing Personal Information

Firetronics takes all reasonable steps to protect the interest of individuals when disclosing personal information to third parties. We do not disclose personal information for purposes other than those for which it was collected, unless we are required/permitted by law to do so.

Personal information may be accessible to affiliates and service providers who assist us in delivering our services, such as IT service providers. We take reasonable steps to ensure that any such third parties who we entrust with personal information are reputable, and have safeguards in place to protect this information.

Note that in the context of hosting and backing up our clients' data, personal information may be stored in a foreign jurisdiction. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request, in order to comply with foreign laws.

5. Keeping Personal Information Safe

Firetronics has implemented critical physical, organizational and technical measures to guard against unauthorized or unlawful access to the personal information we manage and store. We have also taken steps to avoid accidental loss or destruction of, or damage to, personal information. While no system is completely secure, Firetronics uses industry approved software that meets regulatory standards for a ULC (*Underwriter's Laboratory of Canada*) fire and security monitoring station in order to provide our services. We have also implemented measures to significantly reduce the likelihood of a data security breach.

Here are some examples of the security controls we have in place:

- Secure office premises and limited personal information in paper form, supported by locked filing cabinets and a secure shredding practice;
- Secure systems for a paperless monitoring environment with robust authentication measures, including complex passwords, for electronic records;
- Limited role-based access to personal information by Firetronics employees;
- A regularly patched firewall with a built-in intrusion detection tool that generates alerts for suspicious network activity; and
- Audit logs that track all data entry and edits.

Our clients are responsible for letting us know right away if monitoring contact information changes. Firetronics is not liable for any unauthorized access to personal information that is beyond our reasonable control.

6. Accessing Personal Information

We make every effort to ensure that the personal information we hold is accurate, complete and up-to-date for the purposes for which it is collected. Clients can request access to personal information at any time, such as operator comments, and also request that it be corrected if there are any inaccuracies.

You will need to provide as much information as you can to help us process the request and locate the information you require. Firetronics responds to access requests in a timely manner to ensure our clients are able to meet their own responsibilities for responding to requests for information they may receive.

7. How Long We Keep Personal Information

Firetronics retains personal information for as long as necessary to fulfill legal or business purposes and in accordance with our retention schedules. Once your information is no longer required by Firetronics to administer products or services and meet legal or regulatory requirements, it is securely destroyed, erased or made anonymous.

Keep in mind however that information may be retained for a lengthier period of time due to an on-going investigation or legal proceeding, and that residual information may remain in back-ups for a period of time after its destruction date.

8. Our Privacy Complaint and Breach Management Process

Firetronics takes privacy complaints very seriously and has a procedure in place for escalating and managing any privacy related concerns to ensure that they are responded to in a timely and effective manner. Any suspected privacy breach must be escalated internally to Firetronics' Privacy Officer who oversees the containment, investigation and corrective actions for any privacy breach situation.

9. External Links

We may offer links from our website to the sites of third parties that may be of interest to you. Firetronics makes no representations as to such third parties' privacy practices and we recommend that you review their privacy policies before providing your personal information to any such third parties.

10. Changes to this Policy

We may change this Privacy Policy from time to time in order to better reflect our current personal information handling practices. Thus, we encourage you to review this document frequently! The "Last Updated" date at the top of this Privacy Policy indicates when changes to this policy were published and are thus in force. Your continued use of Firetronics products and services following the posting of any changes to this Privacy Policy means you accept such changes.

11. Getting in Touch

Any inquires, concerns or complaints regarding privacy should be directed to:

Privacy Officer
Firetronics 2000 Inc.
550 Alden Rd., Unit 110
Markham, ON L3R 6A8
Tel: 1-800-244-0088
privacy@firetronics.ca

Your concerns will receive prompt attention. Our Privacy Officer can also provide you with more detailed information about Firetronics' policies and practices or assist you with completing an access to information request.

Thank you for continued trust in Firetronics.