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FERO CORPORATION PRIVACY NOTICE

This privacy notice will inform you of:

- your privacy rights
- how the law protects you
- how we look after your personal data, why we hold it and what we do with it

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and process personal data through the work we carry out for our clients and related business activities. We make changes to this notice from time to time.

CONTROLLER/PROCESSOR

This privacy notice is issued on behalf of FERO Corporation so when we mention FERO, “we”, “us” or “our” in this privacy notice, we are referring to FERO.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact info@ferocorp.com.

If FERO is unable to address your concern to your satisfaction, you may bring the matter to the attention of the appropriate Privacy Commissioner. Some of our activities are subject to the jurisdiction of the [Office of the Privacy Commissioner of Canada](#); other activities are subject to the jurisdiction of the Privacy Commissioner of your province or territory of residence.

WHAT INFORMATION DO WE COLLECT?

When you visit this website, use our products or where we carry out related activity you may knowingly provide us with personal information, or we may collect personal information about you.

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data - includes first name, last name, username or similar identifier, title
- Contact Data - includes email address and telephone numbers
- Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- Usage Data - includes information about how you use our website, products and services
- Marketing and Communications Data - includes your preferences in receiving marketing from us and your communication preferences

1. Personal Information You Choose to Provide:

Registration Information

When you register for any of our products, services or newsletters you will provide us information about yourself.

Email Information

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail and telephone.

2. Website Use Information:

Similar to other commercial websites, our website utilizes a standard technology called “cookies” (see explanation below, “What Are Cookies?”) and web server log files to collect information about how our website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, and the websites visited just before and just after our website.

What Are Cookies?

Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser.

They are widely used to ‘remember’ you and your preferences, either for a single visit through a ‘session cookie’ or for multiple repeat visits using a ‘persistent cookie’. They ensure a consistent and efficient experience for visitors, and perform essential functions such as allowing users to register and remain logged in.

Cookies may be set by the site that you are visiting, known as ‘first-party cookies; or by third parties, such as those who serve content or provide advertising or analytics services on the website, known as ‘third-party cookies’.

Both websites and HTML emails may also contain other tracking technologies such as ‘web beacons’, or ‘pixels’. These are typically small transparent images that provide us with statistics for similar purposes as cookies. They are often used in conjunction with cookies, though they are not stored on your computer in the same way. If you disable cookies, the web beacons may still load, but their functionality will be restricted.

IP Addresses

IP addresses are used by your computer every time you are connected to the Internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as traffic data so that data (such as the Web pages you request) can be sent to you.

General Data Protection Regulation (GDPR) Privacy Notice

FERO Corporation Privacy Notice - January 2021

3. Third Party and Publicly Available Sources

We may receive personal data about you from various third parties and public sources as set out below:

- Identity and Contact Data from your employer where they use our services
- Identity and Contact Data from publicly available sources

SHARING AND SELLING INFORMATION

We do not share, sell, lend or lease any of the information that uniquely identify a subscriber (such as email addresses or personal details) with anyone except to the extent it is necessary to process transactions or provide services.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Generally, we do not rely on consent as a legal basis for processing your personal data. We have set out below a description of all the ways we plan to use personal data, the legal bases we rely on to do so, and whether we process that data as data controller or processor. We have also identified what our legitimate interests are where appropriate.

Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing (including basis of legitimate interest)	Controller/Processor
Administering our provision of our services to you/your Employer	Identity Contact	Necessary for our legitimate interests (performance of a legitimate business contract with you/employer)	Controller
To administer and protect our business, this website and our products (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)	Controller
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	Controller
Marketing Activity	Identity Contact	Necessary for our legitimate interests (to market to potential and existing customers in a compliant manner)	Controller

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out above.

SECURITY

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention of Data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

POLICY MODIFICATIONS

We may change this Privacy Policy from time to time. If/when changes are made to this privacy policy, we will email users who have given us permission to do so. We will post any changes here, so be sure to check back periodically. However, please be assured that if the Privacy Policy changes in the future, we will not use the personal information you have submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy, without your prior consent.