

## **Outsource**

### **Privacy Statement**

We know your personal information is important to you and it is also important to us.

We collect your personal data to provide virtual assistant services to you. This includes your name, phone number, email address and postal code. Credit card information is not retained.

### **Data Controls**

Outsource controls data under the applicable data protection legislation.

### **Why We Collect and Process Your Information**

Without collecting and using the information you provide to us or we obtain about you, it would not be possible for us to provide you with our products and/or services.

We use information held about you in the following ways:

#### **Information you give to us**

Information you give to us:

- To carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about new products or services we offer that are like those that you have already purchased or enquired about;
- To contact you from time to time for market research purposes. We may contact you by email or phone.

#### **Information we collect about you**

We will use this information:

- To administer our products and services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- To improve our products and services to ensure that content is presented in the most effective manner for you;
- As part of our efforts to keep our products and services safe and secure;
- To measure or understand the effectiveness of marketing and product information we serve to you and others, and to help deliver the most relevant information to you.

We must have lawful bases to collect and use your personal information, the below sets these out:

### **Needed for your contract**

Personal information about you and other users registered under the same plan is held and used to:

- Provide you with information about the product or service;
- Receive payment;
- Provide customer care and service;

### **Required by law**

We use your personal information to comply with any law and regulations where we are required to do so.

### **Our legitimate interest**

We use your personal information for our legitimate interests as shown below. We have taken account of any privacy risks and ensured that your data protection rights are not affected. We believe these uses benefit our customers. You can contact us via email if you have any questions: **[outsourcing.inquiries@hotmail.com](mailto:outsourcing.inquiries@hotmail.com)**

- Training: for virtual assistant and customer service training and compliance purposes;
- Statistical Analysis: we combine and group personal information for analysis to help us understand our customers and develop better products and services;
- With your consent: For certain of our uses, we rely on your consent to collect and use your personal information. You are given the choice to provide consent or not. When we collect your consent, we explain what we need it for and how you can change your mind in the future.

Personal Information May Be Shared With:

- Business partners, suppliers and subcontractors for the performance of any contract we enter with them or you.
- Data storage partners and who provide virtual infrastructure.
- Partners who provide payment processing facilities on our behalf.
- Analytics and search engine providers that assist us in the improvement and optimization of our products or services.

If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

We may disclose your personal information to third parties:

- If we dispose of or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Outsource or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Outsource, its customers or others.

### **Data Retention Periods**

It is our aim to only hold your data for as long as this is necessary. While you continue as a customer with us we will retain your data as detailed above in this statement. The retention period will be 24 months from the date of termination of our terms of service. We have a high number of customers who re-engage with our service after a period of absence. This retention period allows for the data to be reused where necessary. However, you can send an email to request that your Data is deleted at any time within this period. We will respond to your request and complete the full deletion within 30 days.

Specific legal periods are in place for payments details, tax and invoicing data, and this would be retained in accordance with the law (which is currently six years).

### **Security**

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. The transmission of information via the internet is also not completely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to us. Any transmission of data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorized access.

### **Your Rights**

Where we process your data solely based on your consent, you are entitled to withdraw your consent at any time. This will not affect the lawfulness of our processing before the withdrawal.

You have the right to be informed about how your data is collected and used. You are entitled to know what data we collect about you, and how it is processed. You are entitled to correct and update any personal information about you, and to request this information be deleted. You may amend your account information at any time.

You also have the right to lodge a complaint with the Data Protection Commission at any time.

The exercise of your rights might be subject to certain conditions and we might require further information from you before we can respond to your request. You may exercise your rights by contacting Outsource at the address or e-mail address provided below.

### **Changes to This Statement**

We reserve the right to change this Statement from time to time at our sole discretion. If we make any changes, we will publish those changes on our website. At the bottom of this document you will find the date on which this Statement was last updated.

## **Contact Us**

Questions, comments, requests and complaints regarding this Statement and the information we hold are welcome and should be addressed to **outsourcing.inquiries@hotmail.com**. We endeavor to deal with all requests promptly and efficiently.

**Sonya Tulk**  
**Administrator**

Outsource  
17 Jackie Place, Conception Bay South, NL A1X 2E3 Canada  
(709) 424-5457