

# Privacy Policy

Last Updated: December 18, 2018

This Privacy Policy explains how we collect, use and disclose your personal information for <http://www.tractusprojects.com/> (the “Site”). The Site is operated by Tractus Group Incorporated (referred to as “Operator”, “us”, or “we”). This Privacy Policy applies solely to information collected by this Site. We respect the privacy and integrity of any personal information that you provide in the use of our Site and Services.

This page contains the Privacy Policy for the Site, as well as for any other websites or microsites operated by the Operator (collectively and together with the Site, the “Sites”), and for web applications, tools, forums, or social media pages offered by the Operator on the Sites, and for any online services offered by the Operator, including but not limited to information provided on the Site in relation to the Operator’s commercial office and retail contractor services, marketing, and customer inquiry services (collectively, the “Service”).

## 1. Acknowledgment

By accessing or using the Sites, you consent to the collection, use and disclosure of personal information by the Operator in accordance with this Privacy Policy. You may choose not to provide us with personal information. However, if you make this choice we may not be able to provide you with the application, service or information that you requested.

## 2. Definitions

For the purposes of this Privacy Policy, the following words have the following meanings:

- (a) “**collection**” means the act of gathering, acquiring, storing, retrieving, recording or obtaining personal information from any source, including third parties, by any means.
- (b) “**consent**” means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative, such as a parent or guardian. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from a user's action or inaction.
- (c) “**disclosure**” means making personal information available to a third party.
- (d) “**employee**” means an employee of Tractus Projects, and for the purpose of this Privacy Policy only, includes agents, independent and other contractors performing services for the Operator.
- (e) “**personal information**” means information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual.

- (f) **“processing”** or **“process”** means any operation performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- (g) **“Subscribing Organization”** means an individual, company, entity or organization that has subscribed to the Service and the site.
- (h) **“third party”** means an individual other than the user, or the user's agent, or an organization outside of the Operator or a Subscribing Organization.
- (i) **“use”** means the treatment, handling and management of personal information by and within the Operator.
- (j) **“user”** means an individual who uses the Service provided by the Operator, including anyone else who accesses or visits the Sites.

### 3. Information Collection, Use, and Sharing

We may collect any or all of the following personal information if the information is reasonably required to provide the services accessed or requested by you:

- (a) information that you provide when you complete forms on the Sites, such as your name, postal address, email, and telephone number;
- (b) information that you provide to the Operator when you become a Subscribing Organization;
- (c) information you provide when you access the Site such as your geographical location, browser type and version, operating system, length of visit, page views and website navigation paths;
- (d) your correspondence with the Operator’s employees or agents, including but not limited to correspondence with agents in relation to property listings and including any questions, concerns or comments you may have about the Service, the Sites or problems that you report; and
- (e) details of your requests made through the Sites.

We do not collect information related to methods of payment such as a credit or debit card and will not sell or rent personal information to any third party.

We will collect and use your personal information as is reasonably required for the following purposes:

- (a) to provide web applications, the Site, the Services, and/or the other services or information that you request;
- (b) to improve users’ experience of the Site;
- (c) to respond to questions, comments, requests, job applications, or complaints that you submit to the Operator;

- (d) to track communications with you;
- (e) to analyze use of the Site and the Service and to improve the Site and the Service;
- (f) to send emails, newsletters, regular mail or other communications you have consented to receive from the Operator;
- (g) to provide Service and Site-related announcements or notifications to you;
- (h) to detect and protect against fraud and error;
- (i) to fulfill a purpose that we disclose to you when we request your personal information; and/or
- (j) to meet legal and regulatory requirements.

The Operator's staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Personal information will only be collected and used by authorized staff in a manner consistent with the activities of the Operator.

## **4. Disclosure**

The Operator may disclose your personal information to:

- (f) each of its employees, agents, partners and service providers as is reasonably necessary to enable these parties to perform a business, professional or technical support function for the Operator;
- (g) a person who, in the reasonable judgment of the Operator, is seeking the information as your agent; and
- (h) a third party or parties, where you consent to such disclosure or the disclosure is required by law.

We may also disclose your personal information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to such transaction, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

## **5. Processing and Retaining Personal Information**

We may process your personal information about your use of our Site and Services. The Operator does not collect IP addresses and any IP addresses are loaded anonymously to the Site. Personal information may be processed for the purposes of analyzing users' use of the Site. The legal basis for this processing is the Operator's legitimate interests, including monitoring and improving its Sites and Services. The Operator will not retain personal information longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

## **6. Accuracy**

The Operator is committed to keeping your personal information as complete, up-to-date and accurate as is necessary for the purposes for which it is to be used. The Operator will promptly correct or complete

any personal information found to be inaccurate or incomplete. Where appropriate, the Operator will transmit amended information to third parties having access to the personal information in question. Upon request, the Operator will provide you with a reasonable opportunity to review the personal information in your file to review its accuracy. Such personal information will be provided within a reasonable time of the request and at a minimal or no cost to you.

Also upon request, the Operator will provide an account of the use and disclosure of your personal information within 30 business days after the date of the request and, where reasonably possible, will state the source of the information. In providing an account of disclosure, the Operator will provide a list of organizations to which it may have disclosed personal information about you when it is not possible to provide an actual list. Upon request, the Operator will provide personal information in a structured, commonly used and machine-readable format within 30 business days after the date of the request.

## 7. Non-Personal Information

Non-personal information is information that does not identify you and which we are unable to connect to other information in order to identify you. The Operator may collect any or all of the following non-personal information:

- (a) Aggregated data resulting from the combination and/or aggregation of certain raw data collected from you or your business (including, but not limited to, the type of Internet browser you are using, the type of computer operating system you are using, and the domain name of the web site from which you linked to our Site or advertisement).
- (b) The Site employs a web analytics service that uses “cookies”, which are text files placed on your computer, to facilitate your access to the Site and to personalize your online experience. Through the use of these cookies we may also collect information about your activity and interactions within the Site including pages you visit and links clicked. Cookies are accepted automatically and it is your responsibility to disable your browser in the event you do not wish to accept. The decision to decline cookies may also limit or restrict service or access to the Sites.
- (c) We may also use additional analytics programs from time to time to process non-personal information about you.

We make no attempt to link this non-personal information with the identity of individuals using the Sites. Non-personal information may be permanently archived for future use in any manner whatsoever by the Operator.

This Site may contain links to other websites. While we try to link only to websites that share our standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other websites.

## 8. Your Access to and Control Over Information

You may opt out of any future commercial electronic messages from us at any time. You can do the following at any time by contacting us through the email address or telephone number provided below in Section 11:

- Unsubscribe from receiving commercial electronic messages regards our new products or services, promotions or other similar communications;
- Request a copy of the personal information we have about you, if any.
- Change/correct any personal information we have about you, if any.
- Request us to delete any personal information we have about you, if any.
- Express any concern you have about our use of your personal information.

You may withdraw your consent to the collection, use or disclosure of your personal information by the Operator at any time, subject to legal or contractual restrictions and reasonable notice. In certain circumstances, your withdrawal of consent will result in the inability of the Operator to continue providing aspects of the Site and the Service to you. Please contact the Operator for more information regarding the implications of withdrawing consent.

## 9. Safeguarding Your Personal Information and Breach

We take precautions to protect your personal information. When you submit personal information through the Sites, your information is protected both online and offline. The Operator uses appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction regardless of the format in which it is held. The methods of protection and safeguards used by us include, but are not limited to, passwords, encryption and firewalls. The computers and servers in which we store personal information are kept in a secure environment. We also protect your personal information offline by need-to-know access. Only employees of the Operator who need the information to perform a specific job (for example, billing or customer service) are granted access to your personal information.

While the Operator cannot guarantee that risks such as loss, theft, unauthorized access or disclosure of personal information will not occur, the Operator will make every reasonable effort to prevent such unfortunate and unforeseen occurrences. The Operator takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the information. The Operator also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information. Finally, the Operator protects personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

In the event of a breach of personal information, the Operator will promptly inform all users affected by the breach within 72 hours of the Operator discovering the breach. If the breach will affect your rights and freedoms, we will inform you about the breach without undue delay.

## 10. Changes

To accommodate changes in our services, changes in technology and legal developments, this Privacy Policy may change over time without notice to you. We may add, change or remove portions of the Privacy Policy when we deem it is appropriate to do so. We encourage you to review our Privacy Policy periodically. Each time you submit personal information or use the Service you agree to be bound by terms of the Privacy Policy which is then current. Whenever we update the Privacy Policy, we will change the date below to indicate when the changes were made.

## 11. Inquiries and Complains

To submit an inquiry, complaint, request a review of your personal information, correct or update your personal information, withdraw your consent or request more information or additional copies of the Privacy Policy contact:

**Tractus Projects**

**Mailing Address: 1000 Elgin Avenue, Winnipeg, MB, R3E 1B4**

**Telephone No.: (204) 942-6035**

**E-mail: [info@tractusprojects.com](mailto:info@tractusprojects.com)**

The Operator will promptly investigate all complaints concerning our compliance with the Privacy Policy and our dealings with your personal information. If a complaint is found to be justified, the Operator will take appropriate measures to resolve the complaint, including, if necessary, amending our policies and procedures. You will be informed of the outcome of the investigation regarding your complaint.