



PRIVACY POLICY

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Policy Number: 1-13

Introduction

Prime Hires respects the privacy and rights of all who visit our website and submit information to us via any method. The purpose of our privacy policy is to demonstrate our firm's commitment to protecting the privacy of our clients, candidates, guests, partners, website visitors and internet users. It has been created to inform all relevant parties about the policies and practices we follow when collecting, storing, and using personal information. Our policy has been created to adhere to the standards set out in the federal Canadian Personal Information Protection and Electronic Documents Act (*PIPEDA*) and Canada's Anti-Spam Law (*CASL*).

It is Prime Hires' intention to comply at all times with *PIPEDA* and *CASL*, or any successor legislation. If at any time this policy conflicts with *PIPEDA*, *CASL*, or any other successor legislation, Prime Hires will comply with that legislation.

We have made a copy of this statement available on every page of our website via a hyperlink in the footer area with the title 'Privacy Policy'.

Details about our Privacy Policy

Prime Hires' privacy policy details the collection process, storage and use of personal, historical, career-related, or other information that is shared with or obtained by us, either by visiting our website or by completing and submitting web-based forms or by any other means.

This policy does not apply to the collection of personal information by third parties, even when Prime Hires features links to the websites of third parties on the pages of our website or in postings on any of our social media or other accounts. The provision of a hyperlink that leads to a 3rd party website, or other 3rd party owned digital asset like a social media account, should not be seen as an endorsement of that party or as an indication that their information collection practices and policies are the same as ours. Any link shared is simply as a convenience. We strongly encourage you to review the privacy policy of any website that you visit before sharing any kind of personal or sensitive information.

Why does Prime Hires Collect Personal Information?

We collect personal information to aid our clients and candidates in their search for an ideal employment match. It is by collecting, storing and accessing this personal information that we are able to match candidates with our clients who require their skills and abilities.

A few examples of why we collect personal information include:

- So that we may gain an understanding of a job-seeker's qualifications, needs, wants and preferences; and how to match them with the needs of our clients

- To help verify a candidate's qualifications, previous work history and to perform background and/or other checks
- So that we know how to communicate with candidates about work and other career-building opportunities
- To disclose any information about a jobseeker that is provided by them, their references, or any other sources to our clients; as authorized by the jobseeker as part of our process of matching them to positions for which they may be suited.
- To help us continuously refine and improve our processes and services to match the ever-changing needs of the markets in which we operate
- So that we are able to provide the necessary payroll and other HR functions to those placed in temporary staffing arrangements by Prime Hires
- To allow us to communicate with both clients and jobseekers in our efforts to service both parties as effectively and efficiently as possible

Using and Sharing Personal Information

Prime Hires only uses personal information with consent and in the manner described in this policy. We never 'scrape,' trade, sell or buy personal information to anyone for any purpose.

We do not collect information that is not reasonably required for the purpose of finding suitable, temporary, or permanent employment opportunities for candidates and corporate clients.

We will not use your information for any purpose other than what is detailed in this document.

What Kind of Personal Information Does Prime Hires Collect?

For a jobseeker, personal information collected may include:

- Contact information (full name, home and mailing addresses, home and mobile telephone numbers, email address, etc.)
- Files or text containing personal history contained in documents like CV's, resumes, education and employment histories, statements about work/job interests and written references and/or information related to background and/or other checks
- General information reasonably linked to or helpful to matching job seeks with an employment opportunity. Examples include contact preferences and methods.
- Personal financial information necessary to satisfy the Canada Revenue Agency payroll requirements (In the event that temporary employment is offered).
- Online identification information such as user IDs, account passwords, security questions, etc.

Prime Hires also collects information from commercial providers, such as online job boards, LinkedIn and other sources commonly held to be credible providers of such information. On occasion, this information may be used to supplement the information a job seeker has provided to us.

When seeking to place a candidate, we may also use information collected from references that are provided by the candidate, or from corporate customers who the candidate has had an employment history with.

As with most commercial websites, Prime Hires may also use automatic data collection tools and methods like Google Analytics' tracking code, cookies, tracking pixels and other common tools that collect standard information that a visitor's browser provides when a user visits or interacts with our website(s) or our

social media accounts. This information may be collected and used in addition to the information that you provide to us but only for the purposes stated in this privacy policy.

How Prime Hires Shares Information

Prime Hires may share a job-seeker's personal information with one or more of our corporate clients if we feel that the individual may be a good match for an opportunity that the client has made available. We only provide our clients with information that we feel they will find either useful or necessary to make an informed decision on whether or not a candidate will make a good fit for an opportunity.

To deliver some of our services, it may be necessary for Prime Hires to use third party services, software or service providers to deliver or share information. In such cases, Prime Hires only shares information with these parties that is required for them to perform their services. All providers that we work with to deliver or share information are required by contract to keep confidential and secure the information we share with them.

Prime Hires will not share personal information with third parties without consent unless required by law or a duly authorised legal process such as a court order.

As a requirement of providing our services, Prime Hires will store and process your personal information in Canada or in the US, using US based third party service providers in accordance with our privacy policy. Any personal information stored or processed outside of Canada will be subject to the laws of that jurisdiction.

Information Storage

Collected personal information will be stored indefinitely by Prime Hires. Information is stored on both internal and 3rd party servers and computers based in the United States and Canada. We take information security and privacy seriously and ensure that industry standard levels of security are in place to keep data as safe and secure as possible.

Accessing Information

Personal information stored by Prime Hires is only accessible by individuals who are part of the process that matches candidates with opportunities provided by our corporate or other clients. The access to information is restricted to key persons and is password protected. Information is only accessed for the purposes described in this policy statement.

Editing or Deletion of Personal Information and Preferences

Prime Hires respects the rights of both jobseekers and our clients. As such, we provide the opportunity to choose and change both communication preference options and the specific details of information that we have held in storage.

If there are changes that we should be made aware of like career changes or the desire to be removed from consideration for career opportunities, please contact us at: privacy@primehires.com with a clear explanation of your wishes.

To change your communication preferences or anything else relating to the information stored about you, please send an email to: privacy@primehires.com.

Future Changes to Privacy Policy

Should Prime Hires make any changes to this policy, Prime Hires will notify jobseekers and clients via email. It is your responsibility to ensure that Prime Hires has up-to-date contact information in order to notify you of any changes.

The most recent privacy policy will appear on Prime Hires' website.

Email Communications

Prime Hires will only send emails that are either:

1. Direct replies to questions or queries sent to us via email, or
2. Correspondence that can be expected in the course of an established business relationship with Prime Hires. Communications that would be expected as part of an established business relationship; include but are not limited to; the notification provided to a candidate that an opportunity has been found that they might be interested in, and a request for further information or clarification on a matter from a client or candidate.

Prime Hires will seek express permission to send email communications for any other purpose besides the exceptions detailed above. For example, we will seek express permission before including an individual's email on a mailing list to receive our quarterly newsletter.

We offer the option to opt out of all email communications. Please contact our privacy officer at privacy@primehires.com if you would like to opt out of receiving all emails from Prime Hires.

Prime Hires takes full responsibility for management and confidentiality related to personal information we have collected. If you have any questions, comments or concerns related to this policy, or the collection and management of personal information, please contact our privacy officer at privacy@primehires.com.