



## **PRIVACY POLICY**

**(Canada)**

**Effective Date: 1 June 2018**

### **1. Name and Contact Details of the Controller and the Company Data Protection Officer**

This Privacy Policy applies to the collection, use, disclosure and other processing of personal information by **Park Place Technologies, LLC**, 5910 Landerbrook Drive, Mayfield Heights, OH 44124, USA in connection with your use of its online customer portal and related services (e.g. website) (all together “**Services**”)

### **2. Collection and Storage of Personal Data / Type and Purpose of their Use**

#### **2.1 When visiting the website**

##### **(a) Automated Collection**

When you visit our website ([www.parkplacetechnologies.com](http://www.parkplacetechnologies.com)), the browser on your device automatically sends information to the server on our website. This information is temporarily stored in a log file. The following information is recorded without your intervention and stored for as long as reasonably necessary for legitimate business purposes:

- IP address of the requesting device,
- Device identifier,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which access is made (referrer URL),
- The browser used and, if applicable, the operating system of your computer as well as the name of your access provider.

The above data will be processed by us for the following purposes:

- To ensure a smooth connection of the website;
- To help us understand our website activity;
- To monitor and improve our website; and
- To evaluate system security and stability.

Under no circumstances do we use the data collected for the purpose of drawing conclusions about you personally.

In addition, we use cookies and other analysis tools (incl. tracking technologies) when you visit our website. You will find more detailed explanations under Sections 5 and 6 of this Privacy Policy.

(b) When requesting a quote

If you want to request a quote, we offer you the opportunity to contact us using a contact form provided on the website. Your name, the company's name and a valid business e-mail address or business phone number is required so that we know who sent the request and can respond to it. We may also collect additional information to inform our quote.

The data will be processed in order to respond to your request for a quote and provide further information about our Services.

We have retention processes designed to ensure personal data is retained for no longer than necessary for the purposes for which such data was collected, for legitimate business purposes, or to otherwise meet legal requirements.

(c) When using our chat live function/contact form

If you have any questions, we offer you the opportunity to contact us using the chat live function (or in case of non-availability, a contact form) provided on the website. Your name, the company's name and a valid business e-mail address is required so that we know who sent the request and can respond to it. Further information such as postal code can be provided voluntarily. We may also collect additional information as necessary needed for us to promptly respond to your inquiry.

The data will be processed for the purpose of responding to your inquiry. We have retention processes designed to ensure personal data is retained for no longer than necessary for the purposes for which such data was collected, for legitimate business purposes, or to otherwise meet legal requirements.

(d) When posting or submitting reviews and other user generated content

When you post or submit reviews or other user generated content to us (via website or otherwise), we collect your name as well as the content of your review or other submission. We will only process such content in order to fulfil the intended purpose of such posting or submission. We may also use this information to help us in developing our products or Services and to make our marketing more relevant to your interests. Please note that by posting and submitting reviews and other user generated content to the website or other public areas of the Services, this user generated content may be available to other customers, website visitors, and other third-parties. Please use discretion when posting or submitting reviews and other content that contain personal information.

(e) When applying for a job opportunity

If you apply for a job opportunity through our website or other means, we collect your name, e-mail address, and information contained in your resume, cover letter or other employment-related materials you provide to us.

We have retention processes designed to ensure personal data is retained for no longer than necessary for the purposes for which such data was collected, for legitimate business purposes, or to otherwise meet legal requirements.

Please note, we do not ask for, do not recommend, and you should not send us any sensitive personal data, such as data related to your health, through our application tool or as part of the application process.

2.2 When using our customerportal

(a) Automated Collection

The processing of your personal data is subject to the automated collection referred to in Section 2.1(a) above.

(b) Registration to the customer portal

When registering to the customer portal, we require your name, business e-mail address and business account number as well as your company's name.

The personal data is processed in order to provide you with access to the customer portal and to fulfil our contractual obligations to you.

(c) Use of the customer portal

When using the customer portal, you can provide further data on a voluntarily basis. Such data may include account information, company contact personal data, or payment information.

You will further have access to other information related to our Services that might include personal data such as your concluded contracts, scheduled assets under service contracts, or service tickets.

Such personal and other data is processed and provided to you in order to fulfil our obligations under the respective service agreement.

We have retention processes designed to ensure personal data is retained for no longer than

necessary for the purposes for which such data was collected, for legitimate business purposes, or to otherwise meet legal requirements.

### 2.3 Marketing activities

We may use your e-mail address or other contact information to send you information by email or direct mail on our products, events and other service related information.

You can unsubscribe at any time, for example via a link at the bottom of each e-mail. Alternatively, you can send your unsubscribe request at any time by e-mail to [reply@parkplacetech.com](mailto:reply@parkplacetech.com). Please note that you may continue to receive certain transactional or account-related communications from us.

### 2.4 Use for corporate transactions

We may process the above personal data as an asset in connection with or during negotiations of any proposed or actual merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of Park Place Technologies, or transfer of all or a portion of Park Place Technologies' business to another company or other corporate reorganization or change in corporate control ("**Corporate Transaction**") Where appropriate, we will de-identify your personal data beforehand.

## 3. Transfer and Disclosure of Data

Your personal data will not be transmitted to third parties for purposes other than those listed below.

We, and our Canadian, US, or other foreign affiliates and service providers (as applicable), will only transfer or disclose your personal data to third parties if:

- you have given your consent to such transfer or disclosure (e.g. to our affiliates for advertising purposes),
- the disclosure is necessary to assert, exercise or defend legal claims and to investigate or prevent actual or suspected loss or harm to persons or property,
- the disclosure is necessary in connection with or during negotiations of any proposed or actual Corporate Transaction,
- in the event that a legal obligation exists for, or permits, the transfer or disclosure, including in response to a search warrant or other legally valid inquiry or order (which may include lawful access by governmental authorities, courts or law enforcement agencies in Canada, the US, or other foreign jurisdictions), or as otherwise permitted or required by applicable Canadian, US, or other law,

- the transfer or disclosure is to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, and
- the transfer is to our agents, vendors, consultants and other service providers (also known as processors) who provide services on our behalf, such as hosting our website, operating certain of its features, and managing and analysing data). Our service providers may be located in the US, EU and other foreign jurisdictions, and are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal data for their own purposes.

#### **4. Interest-Based Advertising**

We work with third-parties such as ad networks and other advertising companies that use their own tracking technologies (including cookies, tracer tags and pixel tags) on our websites and other websites in order to provide you with tailored advertisements on our behalf across the Internet (including on social media websites). These companies may collect information about your activity across your different devices on our websites and third-party websites (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you both on and off our Services. This information may also be used to measure and evaluate our online advertising campaigns, for statistical and market research purposes, or to tailor promotions or other marketing messages to you across your devices.

The advertisers and service providers that perform advertising-related services for us and our partners participate in the Digital Advertising Alliance of Canada's ("**DAAC**") Canadian Self-Regulatory Principles for Online Behavioral Advertising. To learn more or to opt-out of online interest-based advertising from third parties participating in the DAAC, visit <http://youradchoices.ca/choices>.

Please be aware that, even if you opt out of interest-based advertising, you may continue to receive other types of ads. Opting out only means that the list of participating companies you have opted out from through the DAAC opt-out tool should no longer deliver certain interest-based advertising to you, but it does not mean you will no longer receive any non-targeted content and/or ads. Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use of a different device or web browsers or use a non-browser-based method of access (e.g. mobile app), your DAAC browser-based opt-out may not, or may no longer, be effective.

In addition, subject to applicable law, we may serve ads on third-party services that are targeted to reach people on those services that are also identified on one of more of our databases ("**Custom Audience Ads**"). This is done by matching common factors between our databases and the databases of the third-party services (such as a hashed email address or other contact information).

For instance, we may use such ad services offered by Facebook or Twitter and other third-party services. We are not responsible for these third-party services, including without limitation their security of the data. To withdraw your consent for the use of your information for custom audience purposes on third-party services, please contact us at [support@parkplacetech.com](mailto:support@parkplacetech.com). In addition, if we use Facebook to serve Custom Audience Ads on Facebook services, you should be able to hover over the box in the right corner of such a Facebook ad and find out how to opt-out with us from such list. If you opt-out from our Facebook Custom Audience Ads, we will remove the matching personal information from that list, however, this will not take effect immediately, you may still receive Custom Audience Ads and other advertising from us on other third party services and websites and if you have multiple e-mails or other accounts you may have to opt-out separately for each one. If we use Twitter Matched Use Ads, you should be able to opt-out through your account settings on Twitter. If you opt-out from our Twitter Custom Audience Ads, you will be removed from that list, however, this will not take effect immediately, you may still receive Custom Audience Ads and other advertising from us on other third-party services and websites and if you have multiple e-mails or other accounts you may have to opt-out separately for each one. We are not responsible for such third parties' failure to comply with your or our opt-out instructions or to provide us notice of your opt-out elections, and they may change their options without notice to us or you.

Further detail about some of the specific tracking technologies we use is set out below.

## **5. Cookies, Web beacons and other tracking technologies**

We use cookies with our Services. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you use our services. Cookies do no damage to your end device and do not contain viruses, Trojans or other malware.

Information is stored in the cookie that results in each case in a connection with the specifically used device. However, this does not mean that we immediately become aware of your identity.

The use of cookies serves on the one hand to enhance your use of our Services. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These will be deleted automatically after leaving our site.

In addition, we also use temporary cookies that are stored on your end device for a specified period of time to optimize user-friendliness. If you visit our site again to use our services, it will automatically recognize that you have already been with us and what entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimising our Services (see Section 6). These cookies enable us to automatically recognize you when you return to our site. These cookies are automatically deleted

after a defined period of time.

Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or a message always appears before a new cookie is created. However, the complete deactivation of cookies can lead to the inability to use all functions of our website.

## **6. Analytical Cookies**

We use tracking measures to ensure that our website is designed to meet technical requirements and is continually optimised. We also use the tracking measures to statistically record the use of our website and to evaluate it for the purpose of understanding how users use the site and optimising the website and our Services. As set out above, you may set your Web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our website, you may not be able to take advantage of all of the features of our website.

Further details on the data we collect using analytical cookies is set out below.

### **6.1 Google Analytics**

To better understand and improve our website, we use Google Analytics, a web analysis service provided by Google Inc. (<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter "**Google**"). In this context, pseudonymized user profiles are created and cookies (see point 4) are used. The information generated by the cookie about your use of this website such as

- Browser type/version,
- operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request,

are transferred to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on the website activities and to provide further services associated with the use of the website and the Internet for the purposes of market research, to better understand and improve our Services and demand-oriented design of these Internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of the company. Under no circumstances will your IP address be merged with other data from Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however

please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Further information on data protection in connection with Google Analytics can be found in the Google Analytics Help (<https://support.google.com/analytics/answer/6004245?hl=en>).

## **7. Web Beacons**

Our website use software technology known as transparent GIF files (i.e. web beacons) to help us better manage content on our website by telling us what content is effective. Transparent GIF files are tiny graphics with a unique identifier that function similar to cookies and are used to track the online actions of Internet users. Unlike cookies stored on a user's computer hard disk, transparent GIF files are invisibly embedded in websites and are about the size of the dot at the end of this sentence. We may link the information collected by the transparent GIF files to our customers' personal data.

We use web beacons to ensure that our website is continually optimised. We also use web beacons to statistically record the use of our website and to evaluate it for the purpose of optimising our offers and Services.

## **8. Social Media Plug-ins**

We use social plug-ins from the social networks Facebook, Twitter and Instagram on our website in order to make us more well-known. The third parties who operate such networks have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such networks, and therefore we have no responsibility or liability for the manner in which the organizations that operate such networks may collect, use or disclose, secure and otherwise treat your personal data.

### **8.1 Facebook**

Our website uses social media plugins from Facebook to personalize its use. For this we use the "share" button. This is an offer from Facebook.

When you access a page of our website that contains such a plugin, your browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted directly from Facebook to your browser and integrated into the website.



By integrating the plugins, Facebook receives the information that your browser has called up the corresponding page of our website, even if you do not have a Facebook account or are not currently logged on to Facebook. This information (including your IP address) is transmitted directly from your browser to a Facebook server in the USA and stored there.

If you are logged in to Facebook, Facebook can directly associate your visit to our website with your Facebook account. If you interact with the plugins, for example by pressing the “share” button, the corresponding information is also transmitted directly to a Facebook server and stored there. The information is also published on Facebook and displayed to your Facebook friends.

Facebook may use this information for the purposes of advertising, market research and demand-oriented design of Facebook pages. To this end, Facebook creates usage, interest and relationship profiles, e.g. to evaluate your use of our website with regard to the advertisements displayed to you on Facebook, to inform other Facebook users about your activities on our website and to provide other services associated with the use of Facebook.

If you do not want Facebook to associate the information collected through our website with your Facebook account, you must log out of Facebook before visiting our website.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as your rights and setting options for the protection of your privacy can be found in the data protection information (<https://www.facebook.com/about/privacy/>) on Facebook.

## 8.2 Twitter

Our website contains plugins from the short message network of Twitter Inc. (Twitter). You can recognize the Twitter plugins (“tweet button”) by the Twitter logo on our site. An overview on the tweet button can be found here (<https://about.twitter.com/resources/buttons>).

When you access a page on our website that contains such a plugin, a direct connection is established between your browser and the Twitter server. Twitter receives information that you have visited our site with your IP address. If you click the Twitter tweet button while logged into your Twitter account, you can link the contents of our pages on your Twitter profile. This allows Twitter to associate the visit of our pages with your user account. We would like to point out that, as the provider of the pages, we are not aware of the content of the data transmitted or how it is used by Twitter.

If you do not want Twitter to associate your visit to our pages, please log out of your Twitter account. For more information, please see Twitter's privacy policy (<https://twitter.com/privacy>).

### 8.3 LinkedIn

Our website contains plugins of the career network of LinkedIn Corporation (LinkedIn). You can recognize the LinkedIn plugins (LinkedIn Widgets) by the LinkedIn logo on our site.

When you access a page on our website that contains such a plugin, a direct connection is established between your browser and the LinkedIn server. LinkedIn receives information that you have visited our site with your IP address. If you click the LinkedIn widget while logged into your LinkedIn account, you can link the contents of our pages on your LinkedIn profile. This allows LinkedIn to associate the visit of our pages with your user account. We would like to point out that, as the provider of the pages, we are not aware of the content of the data transmitted or how it is used by LinkedIn.

If you do not want LinkedIn to associate your visit to our pages, please log out of your LinkedIn account.

For more information, please see LinkedIn's privacy policy (<https://www.linkedin.com/legal/privacy-policy>).

## 9. Rights of the Persons Concerned (Data Subjects)

You have the right to access, update, and correct inaccuracies in your personal data in our custody or control at any time, subject to limited exceptions prescribed by law. You can request access, corrections, or updates to your personal data by contacting us at [reply@parkplacetech.com](mailto:reply@parkplacetech.com). If you have registered for our customer portal, you may also update your registration and other account information directly through the customer portal. We may request certain personal data for the purposes of verifying the identity of the individual seeking access to their personal data records.

## 10. Data Security

We use reasonable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, theft, destruction, or unauthorised access, use, or disclosure by third parties. Our security measures are continuously improved in line with technological developments.

## 11. Version and Amendment of this Privacy Policy

This Privacy Policy is currently valid and has the status as of June 2018.

Due to the further development of our website and offers above or due to changed legal or official

requirements, it may become necessary to change this Privacy Policy. You can access and print out the current Privacy Policy at any time on the website at <http://www.parkplacetechnologies.com/customer-service/privacy-policy/>.

## **12. Contact Us**

Please contact our Privacy Officer if:

- you have any questions or comments about this Privacy Policy,
- you wish to access, update, and/or correct inaccuracies in your personal information, or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your personal information.

You may contact our Privacy Officer by email at [support@parkplacetech.com](mailto:support@parkplacetech.com) or by mail at the following address: 5910 Landerbrook Drive, Mayfield Heights, OH 44124.

\* \* \* \* \*