

EXECUTIVE SUMMARY

Contextere Corporation and our subsidiaries (“contextere” or “we”) are committed to complying with data protection legislation, including the data protection regime introduced by the General Data Protection Regulation (EU Regulation 2016/679, the “GDPR”). This privacy notice contains information on what personal data we collect, what we do with that information, and what rights you have.

We process some personal data in order to run our business including through our Madison software applications, websites, products, and services. There are a limited number of circumstances where we may share your information with third parties (for example, pursuant to a court order, if we are part of a merger, or with our business partners and service providers who support our business or collaborate with us). We take the security of your information seriously and take steps to keep your information secure. Please read the full Privacy and Security Policy below and contact us if you have questions.

INTRODUCTION

We respect your privacy and are committed to protecting it through our compliance with this Privacy and Security Policy. This Privacy and Security Policy (together with our ‘Terms of Use’) describes the types of information we may collect from you or that you may provide—for example, when you visit any of our websites or contact us—and how we use, protect, and disclose that information.

This Privacy and Security Policy does not apply to information collected on any third-party site or application (including advertising) that may link to or be accessible from our websites. We are not responsible for the privacy policies or data collection, use and disclosure practices of those sites. We encourage you to review the privacy policies of each site you visit.

Please read this Privacy and Security Policy carefully to understand Contextere’s policies and practices regarding your information and how we will treat it. By accessing or using any of our software, websites or services, you agree to this Privacy and Security Policy.

NOTICE ABOUT HOW WE USE AND PROTECT PERSONAL INFORMATION

We collect several types of information for our business operations, including but not limited to:

Information you provide to us. When you navigate our software, Madison, website or contact us, we may request or you may choose to provide us with certain information. This may include information by which you may be personally identified (“personal information”), such as name, employer, e-mail address or telephone number, and records and copies of your correspondence with us. For security purposes, we may also collect personal information from you if you visit one of our offices.

Information collected from forms on our websites. This includes information provided at the time of registering to use portions of our websites, Madison, products and services, posting material, or

requesting further services. We may ask you for information when you report a problem with our websites, products, or services.

Usage details, IP addresses and cookies. As you navigate through and interact with our websites, we may automatically collect certain information about your equipment, browsing actions and patterns using common internet technologies, such as cookies and Web beacons. This may include details of your visits to our websites, including information about your connectivity, such as your IP address and browser information, location data, logs and other communication data, and the resources that you access and use on the websites. This information helps us to improve our websites and to deliver better and more personalized content and services by enabling us to estimate our audience size and usage patterns and recognize you when you return to our websites.

Email marketing. As a current or previous customer or user of our products or services, you may periodically receive emails from us containing details about features of the products you use and/or about similar products or services that we offer. Such processing may include the placing of beacons, or pixels, that let us know if you have opened our email and how long the email was open. We do this in order to see which emails are effective and which are not, so that we can improve our content and services. It helps us make sure that you are getting emails from us that you find useful and relevant. In doing so, we will not track your location or device information.

General business-related information. We may also receive other personal information from or about you in the ordinary course of our business.

We use information that we collect about you or that you provide to us, including personal information:

- To present our websites, products, Madison and services to you and continuously improve upon them.
- To provide you with information, products or services that you request from us.
- To notify you about changes to our website, products or services (including new offerings) and promotions or events.
- To maintain the integrity and security of our websites, products, Madison and services.

Legal basis for the processing. We are not allowed to process personal data if we do not have a valid legal ground. Therefore, we will only process your personal data if:

- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request, such as when we authenticate your log-in to our services or ensure that you only have access to the services and data we have agreed to provide you with;
- the processing is necessary to comply with our legal or regulatory obligations, such as tax reporting or regulatory requirements;
- the processing is necessary for the legitimate interests of Contextere, and does not unduly affect your interests or fundamental rights and freedoms (see below);
- the processing is necessary for the performance of a task carried out in the public interest; or

- in some cases, and as may be requested from you from time to time, we have obtained prior consent.

To the extent that we process any special categories of data relating to you, we will do so because:

- the data has been manifestly made public;
- the processing is necessary for the establishment, exercise or defense of a legal claim;
- the processing is necessary for reasons of substantial public interest; or
- you have given your explicit consent to us to process that information (where legally permissible).

DISCLOSURE OF YOUR INFORMATION

Protecting your personal information is important to us and we neither rent nor sell your personal information to anyone. We may disclose or transfer personal information that we collect or you provide as described in this Privacy and Security Statement, including:

- To a buyer or other successor in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Contextere's assets, in which personal information held by Contextere about our websites' users is among the assets transferred.
- To our subsidiaries, affiliates, agents, contractors, service providers and other third parties we use to support our business or collaborate with and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes of providing services for or with us.
- To comply with court order, law or legal process, including to respond to government or regulatory requests.
- To enforce or apply our Terms of Use and other agreements that govern the sale or use of our products and services.
- To protect the rights, property or security of Contextere, our employees, our users or others.

ONWARD TRANSFER OF YOUR INFORMATION

To facilitate our global operations, and in accordance with applicable laws, we may transfer your personal information to, and access your personal information from, our corporate offices, subsidiaries, and affiliates in the countries in which we operate, including Canada and the United States.

If your personal data is transferred outside the European Economic Area (EEA), we will put in place suitable safeguards to ensure that such transfer is carried out in compliance with applicable data protection rules. To ensure this level of protection for your personal information, we may use a data transfer agreement with the third-party recipient based on standard contractual clauses approved by the European Commission or ensure that the transfer is to a jurisdiction that is the subject of an adequacy decision by the European Commission or utilize another valid basis for transfer meeting the requirements for appropriate safeguards under the GDPR. You may request additional information in this respect and obtain information regarding the relevant safeguard by exercising

your rights as set out below. Where Contextere transfers personal data to other group companies, we rely on the standard contractual clauses.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. Here are a couple of ways you can have control over your information:

- Tracking Technologies and Advertising. Depending on your browser, you may be able to change settings to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the site may then be inaccessible or not function properly. In relation to email, you can disable most email tracking technology by preventing the loading of embedded pictures in the email. You can do this using your email software settings.
- Promotional Offers from the Company. If you do not wish to receive promotional e-mail messages from us, you can opt-out by sending us an e-mail at info@contextere.com asking to be omitted from future e-mail distributions.

DATA INTEGRITY AND PROPORTIONALITY

We only collect and retain as much personal information as needed for specific, identified purposes described in this Privacy and Security Policy and we will not use it in any way that is incompatible with those purposes.

WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

You may have a right to access and to obtain a copy of your personal data as processed by Contextere. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your personal data.

You may also have the right to:

- object to the processing of your personal data;
- request the erasure of your personal data;
- request restriction on the processing of your personal data; and/or
- withdraw your consent where Contextere obtained your consent to process personal data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

We will honor such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to better understand your request. If we do not comply with your request, we will explain why.

EXERCISING YOUR RIGHTS

To exercise the above rights, you may send an email to info@contextere.com or mail to contextere, 7 Bayview Station Road, Ottawa, Ontario, Canada K1Y 2C5. If you are not satisfied with how we process your personal data, please let us know and we will investigate your concern.

If you are not satisfied with our response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

SECURITY

We take your security seriously and take reasonable steps to protect and secure your personal information from unauthorized access, use, and disclosure. We have implemented adequate technical and organizational measures to protect personal data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the personal data, with particular care for sensitive data.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our websites, products, or services, you are responsible for keeping this password confidential. Please do not share your password with anyone.

Although we take reasonable security measures to protect your personal information, we cannot guarantee the security of your personal information transmitted to our websites. The transmission of information via the internet is not 100% secure and we cannot ensure or warrant the security of any information you transmit to us. We are not responsible for circumvention of any privacy settings or security measures contained on the websites.

HOW LONG DO WE STORE YOUR DATA?

We will only retain personal data for as long as necessary to fulfil the purpose for which it may lawfully be processed or to comply with legal, regulatory or internal policy requirements.

CHILDREN UNDER THE AGE OF 18

Our websites are not intended for children under 18 years of age. If you become aware that your child has provided us with personal information without your consent, please contact us at info@contextere.com and we will work to delete it. We do not knowingly collect personal information from children under 18.