

Diversio Privacy Statement

Diversio (“**Diversio**”, “**we**”, “**us**” or “**our**”) takes steps intended to meet privacy principles and requirements with respect to personal information under applicable Canadian privacy legislation. The purpose of this statement is to inform our customers and other individuals we deal with (“**you**” or “**your**”) how we collect, use, disclose and protect your personal information. Personal information is information about an identifiable individual, as more particularly described under applicable privacy legislation. This statement applies to our collection, use and disclosure of personal information in Canada. This statement does not apply to information about our employees or to information that is not personal information.

Personal Information We Collect

Diversio and its agents and representatives collect personal information in a number of circumstances in the course of assisting organizations in their mandate to analyze, improve and track diversity and inclusion in the workplace. Personal information we collect includes:

- demographic characteristics, including but not limited to gender, ethnicity, sexual identity, and disability;
- details on role/position in place of employment, including but not limited to level in organization, office location, business unit;
- sentiment around personal experiences of inclusion in the workplace;
- such other information we may collect with your consent or as permitted or required by law.

Use of Personal Information

Diversio generally uses personal information for the following purposes:

- provide your employer or community with aggregated insights on diversity and inclusion in their organization
- track progress on diversity and inclusion in your workplace or community
- create sector-specific diversity and inclusion benchmarks
- publish aggregated findings and statistics to raise awareness on diversity and inclusion through traditional and social media
- managing, administering, collecting or otherwise enforcing accounts;
- maintaining business records for reasonable periods, and generally managing and administering our business including defending and bringing legal actions;
- meeting legal, regulatory, insurance, security and processing requirements; and
- otherwise with consent or as permitted or required by law

Disclosure of Your Personal Information

Diversio may disclose personal information to our affiliates (including outside of Canada) for internal audit, management, billing or administrative purposes including defending and bringing legal actions.

Business Transactions. Personal information may be used by **Diversio** and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of **Diversio** or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples:

- permitting those parties to determine whether to proceed or continue with the transaction
- fulfilling reporting, inspection or audit requirements or obligations to those parties

Assignees or successors of **Diversio** or our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Statement.

Legal, Regulatory, etc. **Diversio** may disclose your personal information as necessary to meet legal, regulatory, industry self-regulatory, insurance, audit, and security requirements, and as otherwise with your consent or as permitted or required by law (including as required by applicable Canadian and foreign laws applicable **Diversio** or our agents and service providers, and including lawful requirements to disclose personal information to government authorities in those countries).

Your Consent

Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested). You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an “opt out” option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). **Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this privacy statement, if applicable, or otherwise at the time of collection.**

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our products or services to your employer or community. Note also that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records, disclosures to Canadian and foreign government entities as required to comply with laws, and reporting on credit information after credit has been granted, if applicable).

Diversio collects, uses and discloses your personal information with your consent, except as permitted or required by law. We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

Security

We take reasonable steps to protect your personal information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our custody or control, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents and mandataries of **Diversio** who require access to your personal information in order to fulfil their job requirements will have access to your personal information.

Retention

Personal information is retained as described in this Privacy Statement, and otherwise in accordance with our record retention policies. Our record retention periods are established taking into account requirements of privacy laws, the purposes for which the information was collected, legal and regulatory requirements to retain the information for minimum periods, limitation periods for taking legal action, and our business purposes.

Access, Correction and Contacting Us

Diversio may establish and maintain a file of your personal information for the purposes described above, which will be accessible at 325 Front St. West, Toronto, ON M5V 2Y1. If you wish to request access or correction of your personal information in our custody or control, you may write to the above address, attention Anna Klimbovskaia (COO, Diversio). Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may write to us as described above, e-mail us at anna@diversio.com or telephone us at 1-226-339-7709.

Privacy Statement Changes

This Privacy Statement may be revised from time to time. If we intend to use or disclose personal information for purposes materially different than those described in this statement, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Statement. If you are concerned about how your personal information is used, you should contact us as described above or checking our website periodically at Diversio.Com to obtain a current copy of this statement. We urge you to request and review this Privacy Statement frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes. This privacy statement is effective as of **February 27th, 2019**.