

## MUNISIGHT PRIVACY POLICY

At MuniSight Ltd. (“**MuniSight**”), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that MuniSight collects from or about you, how we use, and to whom we disclose that information.

MuniSight has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals (the “**Privacy Policy**”). This Privacy Policy applies to how we collect, use and disclose the personal information of our customers, suppliers and other parties with whom we interact.

### **Privacy Policy Effective for Canada and the United States**

It is MuniSight’s policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual’s right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada’s and the United States of America’s federal, provincial, and state privacy laws, as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions.

### **Cookies Policy**

#### Transient (or per-session) Cookies

These only exist for the duration of your site visit and are deleted on exit. They recognise you as you move between pages, for example recording the items you add to an online shopping basket. These cookies also help maintain security.

#### Persistent (or permanent) Cookies

These stay on your machine until they expire or are deleted. Many are built with automatic deletion dates to help ensure your hard drive doesn’t get overloaded. These cookies often store and re-enter your login information, so you don’t need to remember login details.

We use both types of cookies. Additionally, cookies can be first- or third-party cookies. First-party cookies are owned and created by the website you’re viewing. Third-party cookies are owned and created by an independent company, usually a company providing a service to the owners of the website.

What we use cookies for? Internet cookies are common and do not harm your system – they just store or gather site information. They help you do things online, like remembering login details so you don’t have to re-enter them when revisiting a site.

We use cookies to:

- Gather customer journey information on our public site only
- Temporarily store input information in our calculators, tools, illustrations and demonstrations
- Store details of your marketing, product preferences to improve our targeting and enhance your journey through our sites and partner sites
- Evaluate our sites’ advertising and promotional effectiveness (we own the anonymous data collected and don’t share it with anyone)

We don't use cookies to track people's Internet usage after leaving our sites and we don't store personal information in them that others could read and understand. We will not sell or distribute cookie information without your prior consent.

### **What Is Personal Information?**

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities.

### **What Personal Information Do We Collect?**

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number and e-mail address;
- product and service related information concerning the products and services that we provide to, or receive from, you;
- credit and financial information such as your direct deposit and banking information; and
- business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to you.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. This information may include contract terms, financial information and other information for the purpose of market analysis and strategic planning.

MuniSight's operations include activities related to providing municipal government operations programs; as such, MuniSight may also collect personal information from individuals participating in and / or impacted by those activities.

As a general rule, MuniSight collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

### **Why Do We Collect Personal Information?**

MuniSight collects personal information to enable us to manage, maintain, and develop our operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;

- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to enable us to undertake our environmental, health and safety activities, including incident planning, response and investigation;
- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable law or regulatory process (for example, we may collect personal information to satisfy the obligations imposed on us by our various regulators); and
- any other reasonable purpose to which you consent.

#### **How Do We Use and Disclose Your Personal Information?**

We may use or disclose your personal information:

- for the purposes described in this Privacy Policy; and
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

#### **When Do We Disclose Your Personal Information?**

We may share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf.

For example, our third party service providers may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in Canada.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of MuniSight or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of MuniSight's required reporting activities to its affiliates;
- to protect the rights and property of MuniSight;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; and with your consent.

## **Your Consent is Important to Us**

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

We may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer. We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

## **How is Your Personal Information Protected?**

MuniSight will endeavor to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction. The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

## **Updating Your Personal Information**

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes. In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

## **Access to Your Personal Information**

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing. When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

#### **Inquiries or Concerns?**

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

#### **Privacy Officer**

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

E-mail: [privacy@munisight.com](mailto:privacy@munisight.com)

#### **Revisions to this Privacy Policy**

MuniSight from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. This Privacy Policy was last updated on October 4, 2018.

#### **Interpretation of this Privacy Policy**

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore where the word “including” is used, it shall mean “including without limitation”. This Privacy Policy does not create or confer upon any individual any rights, or impose upon MuniSight any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada’s federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada’s federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.