

Privacy Policy

SMB Business Immigration Legal Services Professional Corporation (“SMB” or “we”) strongly believes in keeping our clients’ information accurate, secure and confidential in accordance with applicable legislation. This dedication extends to personal information of our clients, service providers and other individuals (“you”). The purpose of this Privacy Policy is to explain to you how we collect, use and disclose Personal Information, the choices you have regarding such use and disclosure, and how you may access or correct that information.

What is Personal Information?

Under this Privacy Policy, Personal Information means any information about an identifiable individual or information that allows an individual to be identified, as defined from time to time in applicable privacy legislation. Personal Information does not include business contact information such as your name, title or position, business address, telephone number, facsimile number or e-mail address.

Consent

By submitting Personal Information to SMB, you agree that we may collect, use and disclose such Personal Information in accordance with this Privacy Policy and as permitted or required by law. You may refuse or withdraw your consent at any time by contacting us at the address provided below (subject to restrictions under law or contracts). Please note, we may not be able to provide you or continue to provide you with certain services or information if you refuse or withdraw your consent. If you provide SMB with Personal Information of another individual, you represent to us that you have that individual’s consent to

allow Insight Legal to collect, use and disclose that Personal Information in accordance with this Privacy Policy.

What Personal Information do we collect?

We may collect the following Personal Information: your name, home address, telephone number, personal e-mail address, billing and account information, information about your legal issue and other information related to providing you legal advice and services. We may also collect Personal Information about your family members, beneficiaries, directors, officers, employees, witnesses, adverse parties, parties-in-interest, investigators, decision-makers, experts and other professional advisors and your business partners, investors, shareholders, competitors and customers.

How do we collect your Personal Information?

We only collect Personal Information that you voluntarily provide to us through email, the completion of forms, telephone or in-person meetings, or otherwise in the course of providing services to you.

In obtaining your consent to collect, use and disclose your Personal Information we will use reasonable efforts to inform you of the purpose for which Personal Information will be collected, used or disclosed. The form of consent may vary depending on the circumstances and type of information disclosed. We will take into account the sensitivity of the Personal Information and your reasonable expectations when determining the appropriate form of consent.

Why do we collect your Personal Information?

Generally, while providing professional legal services to our clients, we collect, use and disclose Personal Information about our clients and service providers. Further, we collect, use and disclose Personal Information about applicants for positions with SMB for the purpose of evaluating the application and deciding whether to establish (and later to manage or terminate) an employment, contractual or partnership relationship.

Outlined below are the purposes for which we collect, use and disclose Personal Information:

- to establish and manage client relationships, provide legal advice and services, fulfill legal duties, and avoid conflicts of interest;
- to establish and maintain commercial relationships with clients, suppliers, service providers and other third parties;
- to establish, manage and terminate employment, contractual and partnership relationships;
- to conduct surveys, research and evaluations;
- to develop, enhance, market, sell or otherwise provide Insight Legal's products and services;
- to market, sell or otherwise provide products and services of third parties with whom we have a commercial relationship;
- to distribute our newsletters and other informational e-mail communications and other material to individuals on our mail and e-mail lists;
- to develop and manage our knowledge-management precedent systems and databases;
- to develop and manage our business and operations;
- to detect and protect SMB and other third parties against error, negligence, breach of contract, fraud, theft and other illegal activity;
- to audit compliance with our policies and contractual obligations;
- to engage in business transactions;
- as permitted by, and to comply with, any legal or regulatory requirements or provisions; and
- for any other purpose to which you consent.

To whom do we disclose your Personal Information?

Except as provided for in this Privacy Policy, we will not sell, rent, lease, commercially exploit or otherwise disclose your Personal Information or data to third parties unless: (i) we are required to do so by law or to cooperate with legal investigations; (ii) it is required to protect the legal interests of Insight Legal, including for credit checking and collection purposes or in connection with a

potential financing, merger or acquisition; or (iii) you provide consent to such disclosure.

Occasionally, we may disclose your Personal Information to:

- third party service providers with whom we have a contractual relationship;
- an organization or individual retained by us to evaluate your creditworthiness or to collect outstanding debts;
- a financial institution;
- a person who, in our reasonable judgment, is providing or seeking the information as your agent;
- our insurers and regulatory agencies such as provincial law societies;
- our personnel;
- government authorities, consultants or agents; and
- any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

In certain situations, we may use or disclose Personal Information without your knowledge or consent (as permitted or required by law). These circumstances may be:

- where the Personal Information is publicly available;
- where collection or use is unmistakably in the interests of the individual and consent cannot be obtained in a timely manner;
- to investigate a breach of an agreement or a contravention of a law;
- to comply with a subpoena, warrant, court order or as required or otherwise permitted by law; and
- when information is being collected for the detection and prevention of fraud or for law enforcement.

What do we do to protect your Personal Information?

Our goal is to ensure that your Personal Information is protected and kept secure at all times. We treat your Personal Information as private and confidential. To help protect the confidentiality of your Personal Information, we employ administrative and technological safety measures appropriate to the sensitivity of your Personal Information. Your Personal Information is stored in secured locations and on servers located either at our offices or at the offices of

our service providers. Further, we operate secure data networks protected by industry standard firewall and password protection systems.

How long will we utilize, disclose or retain your Personal Information?

After we have collected Personal Information, we may retain a record of your Personal Information (including correspondence or comments) in our file(s) specific to you (electronic or otherwise) as well as in current and archived email systems. We will continue to use, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected and as required or permitted by law.

Privacy and our website

Cookies

We may use a browser feature called a 'cookie' to collect information when you access our website. A cookie is a small text file containing a unique identification number that identifies your browser, but not necessarily you, to our computers each time you visit our website. The information that may be collected includes the type of Internet browser and operating system you use, the domain name of the website from which you came, date and duration of your visit, number of visits, the average time you spent on our website, pages viewed and number of cookies accumulated. Unless you specifically inform us (for instance, by registering for an event or sending us correspondence from the website), we will not know who you are. In addition to the purposes described in our Privacy Policy, we may use this website information and share it with third parties with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of our website and to simplify your usage. You can reset your browser either to notify you when you receive a cookie or

refuse to accept cookies but if you refuse to accept cookies, you may not be able to use some of the features available on our website.

Online Communications

You may voluntarily submit Personal Information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, subscribing to a newsletter or a mail or e-mail list, participating in a seminar or other event, and participating in contests and surveys. If you are a registered user of an online service on our website, we may combine and store Personal Information about your use of our website and information you have provided to us with certain other online and offline information we may have collected.

E-mail Communications

We may send you marketing or promotional e-mail communications. In this process, we may collect certain information such as the date and time you first opened our e-mail communications, the number of times you open our e-mail communications, the number of instances you click through our articles and your total click-through activity on the contents of our e-mail communications. We may also combine and store any such information to manage and improve our e-mail communications. If you no longer wish to receive any future marketing or promotional material from us, our promotional e-mail communications will include instructions on how to unsubscribe and inform us of your preferences.

Third Party Websites

We may include links to other websites on our website. These third party websites may collect your Personal Information and they may have different privacy policies and practices than SMB. We do not assume any responsibility for the privacy practices, policies or actions of the third parties operating these

websites. We strongly encourage you to read the privacy policies of these websites to enable you to make an informed decision whether or not to provide your Personal Information to the websites' operators.

Changes to our Privacy Policy

We reserve the right to amend this Privacy Policy at any time. You will be informed of changes to our Privacy Policy on our website. We will also make such revised policy and changes available upon request to SMB.

If we seek to collect, use or disclose your Personal Information for purposes other than those to which we obtained your consent, we will obtain the necessary consents required under applicable privacy laws, unless otherwise required or permitted by law.

How do you contact us regarding access to your Personal Information or making complaints?

If you wish to access, verify and/or amend your Personal Information or make a complaint under this Privacy Policy, please send us a written notice to the following address:

SMB Business Immigration

4065- 3080 Yonge Street

Toronto, Ontario

M4N 3N1

E-mail: info@smblaw.ca

Tel: 437-916-9209