



## aRefChex Privacy Policy

By using any software made available via the aRefChex site and platform, you agree to follow and be bound by the terms and conditions outlined in this “aRefChex Privacy Policy”.

Any information collected, held or processed by aRefChex Inc. related to any individual is subject to this policy. It sets out the rights of individuals with respect to their personal information and the responsibilities of aRefChex Inc. to access and use such personal information.

This is in addition to any other requirements under applicable data protection laws and regulations. In the event of a conflict between the data protection laws and regulations and this privacy policy, the data protection laws and regulations will prevail.

This privacy policy may be amended at any point in time and it is incumbent upon individuals to periodically check the policy to inform themselves of any changes.

### 1. Definitions

- 1.1. **aRefChex** means the product and organization which provides the means to collect and manage personal data.
- 1.2. **Individual** includes all identified or identifiable persons about whom aRefChex holds personal data.
- 1.3. **Personal Data** is any data or opinion relating to an individual whether from that data alone or in combination with other information that is in the possession or likely to come into the possession of aRefChex.
- 1.4. **Process (processing)** means any operation or set of operations which is performed upon personal data whether or not by automatic means such as collection, recording, organizing, structuring, storage, adaptation, retrieval, use, disclosure by transmission, dissemination or otherwise making available or destruction of personal data.

### 2. Collection and Use of Personal Data

- 2.1. aRefChex may process personal data in order to provide its services or to operate, administer and optimize its product and to diagnose problems with its product.
- 2.2. Personal data relating to any aRefChex service will be collected from participating customers and invited individuals who chose to participate in the aRefChex process.
- 2.3. aRefChex shall process personal data as it is received and is relevant to provide its services. aRefChex is not responsible for the specific content of the information being collected by customers or the data or opinions provided by individuals. Customers and individuals shall refrain from asking for, sharing or providing sensitive personal data which could include but is not limited to anything revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health, age, or sexual orientation.
- 2.4. aRefChex may offer functionality through third parties integrated with its service. This privacy policy extends to any use of aRefChex through any integrated service.

### 3. Timely Processing

- 3.1. aRefChex shall retain personal data in a manner consistent with applicable data protection laws and regulations. Personal data will not be kept longer than is necessary for the purposes of providing its service or customer termination whichever is longer.

### 4. Rights of the Individual



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- 4.1. Each individual has the right to the personal data held by aRefChex through the customer. If aRefChex receives a request directly, it will be passed along to the customer. Unless demanded through a court order, aRefChex does not release personal data directly.
- 4.2. Each individual has a right to lodge a complaint if they think aRefChex is processing their data in violation of any applicable data protection laws and regulations. As a collector/processor only, aRefChex holds no opinion or value for any such data and will forward the complaint to the customer for resolution.
- 4.3. If an individual can demonstrate compelling legitimate grounds for the processing which would override the interests, rights and freedoms of the individual or for the establishment, exercise or defense of legal claims, aRefChex can choose to release the information directly to the individual.
5. Data Security
  - 5.1. aRefChex shall ensure, to the best of its ability, that appropriate technical and organizational security measures are taken against unlawful or unauthorized processing of personal data and against the misuse, destruction, disclosure, acquisition, accidental loss of or damage to personal data.'
6. Disclosure of Personal Data
  - 6.1. Personal data collected from customers and invited individuals, including, but not limited to candidates, former employers, peers, personal references and professional references.
  - 6.2. This data will be shared with customers via aRefChex directly or through integration of a third party service authorized to handle aRefChex personal data.
7. Cookies
  - 7.1. aRefChex makes use of any/all of the following cookies:
    - 7.1.1. User input cookies - to keep track of the users input which is required in order for the product to work properly.
    - 7.1.2. Authentication cookies - used to identify the user to authenticate them on successive visits to gain access to authorized content.
  - 7.2. To refuse use of cookies, the individual must configure their browser settings to limit or exclude the use of cookies or to delete the cookies that have been placed on their computer. They may not be able to use certain functions of the product. aRefChex is not responsible to provide support to any individual to assist them in this process. An internet search of the name of the browser and clear, delete or manage cookies will provide direction.
8. Contact
  - 8.1. For any issues, questions or complaints regarding this privacy policy or your rights, email [support@arefchex.com](mailto:support@arefchex.com) providing all details.
9. Personal Data
  - 9.1. May include, but is not limited to:
    - 9.1.1. IP address
    - 9.1.2. Name and Postal Address
    - 9.1.3. Phone, Fax, Cell number
    - 9.1.4. Email address
    - 9.1.5. Current and/or Past employer company names, contact names and titles
    - 9.1.6. Dates of Employment
    - 9.1.7. Salary
    - 9.1.8. Reason for leaving
    - 9.1.9. Demographic information
    - 9.1.10. Opinions regarding individual