

# Privacy Policy

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This privacy policy sets out how **AxisDorado Incorporated** (“**AxisDorado**”, “**we**”, “**us**”, or “**our**”) collects, uses, and discloses any personal information that you give us or that we collect when you use our website or use our Services.

AxisDorado acts as a sales consultant for third party companies (our “**Clients**”). Independent sales consultants (“**Independent Sales Representatives**”, “**Distributors**”) under contract with AxisDorado help our Clients sell their products and services to you, the Client’s “**Customer**”.

We offer this website to provide information about our services to Clients, (our “**Services**”), and our relationship with Distributor and potential Distributors.

By using our website or Services, or by choosing to give us personal information (for example by becoming an Distributor or applying to be one), you consent to this Privacy Policy and the processing of your Personal Information it describes.

If you do not agree with any terms of this Privacy Policy, please exercise the choices we describe in this Policy, or do not use the Services and do not give us any personal information.

## Policy Summary

1. **What Personal Information we collect.**
2. **What we do with the Personal Information we collect.**
3. **When we Disclose Personal Information.**
4. **How we Collect Information using Technology.**
5. **Your Choices.**

## SECTION 1 - WHAT PERSONAL INFORMATION DO WE COLLECT?

“**Personal Information**” is information that may identify an individual such as a first and last name, home or other address, an email address, or a phone number or other contact information. “Personal information” does not include information that is about a corporation rather than a human.

We collect personal information:

- When you apply to become an Distributor and if you are accepted as an Distributor,
- When you purchase the products or services of one of our Clients through one of our Distributors,
- When you contact us or communicate with us, and
- When you otherwise provide us with personal information.

In most cases, we collect your personal information directly from you. For example, if you apply to be a Distributor, you provide us with your personal information directly. We may also collect certain

information passively using technology when you visit our website. For more information on this, please see “How we use cookies and collect information using technology” below.

The personal information we collect may vary depending on how you interact with us. For example, we may collect:

- Information such as your name, address, and email address, if you ask to receive information from us,
- Information such as your name, address, and email address, and other information you choose to provide in your application, if you apply to become an Distributor,
- If you are accepted as an Distributor, we collect your name address, phone number email address, banking information needed to arrange direct deposits, and your social insurance number (SIN),
- Information needed by our Client to facilitate a purchase of their goods or services that you choose to make, and
- Any other personal information which you choose to give us. For example, if you contact us, we receive your contact information, and your communications with us.

## **SECTION 2 – HOW WE USE PERSONAL INFORMATION**

We use the information we collect to provide our Services to our Clients, to establish, manage, and potentially terminate our relationship with our Distributors and to provide and understand how people use our website. The manner in which we use your information varies depending on whether you are a Distributor or potential Distributor, a visitor to our website, or a customer or potential customer of one of our Clients.

### **For Distributors**

If you are an Distributor or if you apply to become an Distributor, we use your personal information for the following purposes:

- To evaluate your application to become an Distributor, and if you application is accepted, to establish the Distributor relationship,
- To manage and administer your relationship with us as a Distributor. For example, we use your banking information to make any payments we owe you under our Distributor Agreement, by depositing these directly in the banking account you provide us with. We also use your information and SIN for the purpose of income tax reporting.
- To ensure your compliance with our Distributor agreement, and potentially, to terminate your relationship with us, for example if you breach your Distributor Agreement,
- For our internal record keeping,
- To respond to your questions or complaints,
- To investigate and settle any dispute or claim that involves you,
- To investigate security breaches or cooperate with authorities pursuant to legal matters, and
- For other purposes which are disclosed to you and to which you consent.

### **For Customers of our Clients**

If you are a Customer of one of our Clients who purchases our Client's products or services through one of our Distributors, you are making your purchase from our Client directly, not from us or our Distributor. AxisDorado and its Distributors act as a service provider to our Clients to help them sell their products and services; however, you should understand that our Client, and not AxisDorado, controls your personal information, not us. Your sales or service contact will be directly with the Client whose products or services you purchase, and not with AxisDorado.

As a result, the personal information collected about you, and how that information is used, is decided by our Client, and is subject to their privacy policy. AxisDorado and its Distributors only collect and process this information at the instruction of our Client. If you have any questions about how one of our Clients collects, uses, or discloses your personal information, you should contact that Client, and not us.

For Customers of TELUS who purchase a TELUS product or service through one of our Distributors, your personal information is controlled by TELUS, and is processed in accordance with the TELUS Privacy Commitment. You may read the Telus Privacy Commitment by <https://www.telus.com/en/about/privacy>.

### **For Website Visitors**

If you visit our website, we collect information that helps us understand your needs and provide you with better service, and in particular for the following reasons:

- To improve our Services and the user experience on our website,
- To send email and other communications which we think you may find interesting,
- To manage, administer, maintain, service, collect and enforce any agreement we have with you,
- To respond to your questions or complaints,
- To investigate and settle any dispute or claim which relates to our website, Services, and/or any agreement we have with you,
- To investigate security breaches or cooperate with authorities pursuant to legal matters, and
- For other purposes which are disclosed to you and to which you consent.

For information on how we collect information using technologies such as cookies, please see "How we use cookies and collect information using technology" below.

We may also anonymize, aggregate or otherwise strip any personal information or other information we collect of all personally identifying characteristics and may use or share that aggregated, anonymized data with third parties for any purpose we deem appropriate.

### **SECTION 3 – HOW WE DISCLOSE PERSONAL INFORMATION**

We may share personal information with third parties that help us use your personal information for the purposes described in this Privacy Policy. For example, we may share personal information with service providers that assist us with the activities described in this Privacy Policy, such as companies

that help us run our website, or that process payments for us or for you. For example, if you are a Distributor, we may exchange information between our financial institution and your financial institution to make any payments we owe you under our Distributor Agreement.

Some third-parties, such as your chosen financial institution, have their own relationship with you and their own privacy policies in respect to the information we are required to provide to them to process your payment, or otherwise provide their services. In these cases, you should read their privacy policies so you understand how your personal information may be handled by these service providers.

You should read the privacy policy of the Client whose products or services you purchase for more information, and contact them if you have questions.

We may transfer any personal information we have in the event of bankruptcy, or if we or any part of our business merges with or is acquired by a third party, or if any such transaction is proposed.

We may also disclose personal information to third parties if we have reason to believe that disclosing such information is necessary to: (i) conduct investigations of possible breaches of law; (ii) identify, contact, or bring legal action against someone who may be violating an agreement they have with us; or (iii) to protect our rights, safety or property, or those of others.

We may disclose your personal information if we are required by law to do so or if you violate our Terms, or if you are an Distributor, our Distributor agreement.

Lastly, we may disclose personal information for other purposes which are disclosed to you, and to which you consent.

#### **SECTION 4 - HOW WE USE COOKIES AND COLLECT INFORMATION USING TECHNOLOGY**

If you visit our website, we collect information using cookies and related technologies. A cookie is a small file which is placed on your computer or mobile device's hard drive. Cookies and other technologies can help analyse web traffic or let us know what portions of our website people visit and what features they use. We may use cookies and other technologies to collect information that helps us operate and understand the use of our website, such as your Internet Protocol ("IP") address or device ID, operating system, browser type, username, the pages of the website that you visit, the time spent on those pages, access dates and times, clicks, links used, and actions you take on our website, any errors you encounter, and general region derived from IP address.

We use cookies and other technologies to identify which portions of our website are being used and how they are being used. This helps us analyse data about traffic on our website, correct any errors our users encounter, and improve our website and services in order to better meet user needs. We also use this information for statistical analysis purposes.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Services.

#### **SECTION 5 - WE MAY TRANSFER PERSONAL INFORMATION TO OTHER COUNTRIES**

Personal information that we collect may be stored and processed in Canada and outside your jurisdiction of residence, in any other country or region in which we or our service providers maintain

facilities, including in the United States, and other countries. Personal information processed and stored in another country may be subject to disclosure or access requests by the governments, courts or law enforcement or regulatory agencies in that country according to its laws.

By using our website and services or by providing us with personal information, you consent to any such transfer of information outside of your country. If you have any questions about our use of service providers outside of Canada, you may contact us using the information below.

## **SECTION 6 – SECURITY**

To protect your personal information, we take precautions including physical, organizational and technological measures to help protect personal information from being lost, misused, or inappropriately accessed or disclosed.

Personal information may be accessed by persons within our organization, or our third-party service providers, who require such access to carry out the purposes described in this Privacy Policy, or otherwise permitted or required by applicable law.

Even though we have taken steps to help protect the personal information in our control, you should know that we cannot fully eliminate security risks associated with personal information. No security measures can provide absolute protection. We cannot guarantee the security of any information you provide to us.

## **SECTION 7 - THIS WEBSITE MAY LINK TO WEBSITES WE DO NOT CONTROL**

Our website may link to websites that are operated by third parties we do not control. When you click on such a link, you will be directed away from our website. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements. Once you leave our website to visit a third-party website, this Privacy Policy and our website's Terms no longer apply. You should read the privacy policy and terms of use for each website you visit.

## **SECTION 8 - RETENTION OF PERSONAL INFORMATION**

We retain personal information as long as necessary for the purposes we use it for. When personal information is no longer required, we will take steps to have the information deleted or destroyed.

## **SECTION 9 – CHILDREN**

We do not intend to collect information from children. If you are under the age of majority where you reside, please do not provide us with any personal information.

## **SECTION 10 - ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION, YOUR RIGHTS**

You may request access to your personal information that we hold and to request a correction to it if you believe it is inaccurate, subject to exceptions in the applicable law. If you would like to have access to the personal information we have about you, or if you would like to have it corrected, please

contact us using the contact information provided below. In some cases, we may not be able to allow you to access certain personal information in certain circumstances, for example, if it contains personal information of other persons, or for legal reasons.

Under certain circumstances and subject to applicable data protection laws, you may also be entitled to request additional information regarding our personal information governance practices, including details regarding what personal information is collected about you, the categories of persons who have access to your information, and how long your information will be retained for. You may also have additional rights based on the law of the jurisdiction in which you live.

If you have a complaint about how your personal information is processed, if you have questions, or if you wish to submit a request, please contact us using the contact information provided below.

If you receive commercial email from us, you can also unsubscribe using the unsubscribe tool we provide in such messages.

If you choose to withdraw consent from a processing of personal information we need to provide our Services, we may no longer be able to provide those Services to you.

Please note that to help protect against fraudulent requests related to your personal information, we may ask you for information to allow us to confirm that the person making the request is you or is authorized to access your information before granting access. For example, we may require you to verify your identity before you access your personal information.

#### **SECTION 11 - CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

#### **SECTION 12 - CONTACT US**

If you would like to ask a question about our privacy practices, make a complaint, or exercise your privacy rights, please contact our **Distributor@TELUS.com**.