

PRIVACY POLICY

Introduction

This Privacy Policy applies to the collection, use and disclosure of Personal Information (as defined below) by Xennial Innovations [Inc.] ("**Xennial Innovations**"). Xennial Innovations respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

Xennial Innovations has developed policies and procedures consistent with the *Personal Information Protection and Electronic Documents Act* ("PIPEDA").

Effective Date and Scope

This Privacy Policy governs our practices to the collection, use and disclosure of Personal Information that we collect over our website (the "**Site**") and collect from our clients with respect to our clients utilizing Xennial Innovations' HR Onboarding Services for new employees (the "**Services**").

Accountability

Xennial Innovations is responsible for the Personal Information under our possession and control. We have designated a Privacy Officer to be responsible for our compliance with this Privacy Policy, PIPEDA and other applicable privacy legislation. Xennial Innovations will make known, upon request, the title of the person or persons designated to oversee Xennial Innovations' compliance with this Privacy Policy.

Xennial Innovations is responsible for Personal Information in its possession or custody, including information that has been transferred to a third party for processing. Xennial Innovations shall use contractual or other means to provide a comparable level of protection while the information is being processed by a third party.

Xennial Innovations shall implement policies and practices to give effect to these principles, including:

- implementing procedures to protect Personal Information;
- establishing procedures to receive and respond to complaints and inquiries;
- training staff and communicating to staff information about the organization's policies and practices; and
- developing information to explain the organization's policies and procedures.

Definitions

To better understand this Privacy Policy, Xennial Innovations has set out some basic definitions to use when reading and interpreting it.

- *Collection*: the act of gathering, acquiring, recording, or obtaining Personal Information from any source, including third parties, by any means.
- *Consent*: voluntary agreement to the collection, use and disclosure of Personal Information for defined purposes. Consent can be either express or implied.
- *Disclosure*: making Personal Information available to a third party for that party's own use.
- *Personal Information*: information about an identifiable individual that is recorded in any form but does not include aggregated information or depersonalized that cannot be associated with a User.
- *Transfer*: making Personal Information available to a third party for processing, storage or otherwise, solely to be used on behalf of Xennial Innovations.
- *Use*: the treatment, handling and management of Personal Information by and within Xennial Innovations.

What Personal Information Do We Collect?

- Personal Information that Xennial Innovations collects, includes, but is not limited to: information from individuals that communicate with us via our Site to ask a question or request information about our company, or otherwise submit Personal Information to us through our contact form on the Site;
- for users who are opening an account on our Site, we collect your name, your selected username, email address and password ("**Account Information**");
- information that we collect through performing the Services for our clients ("**Employee Information**"). This includes, but is not limited to:
 - full name and address;
 - date of birth;
 - job title and salary information; and
 - banking information (for payment deposits).
 - service requests and inquiries; and
 - any information that Xennial Innovations collects from you that is intended to improve and personalize our products and services.

How Do We Use Your Personal Information?

Xennial Innovations uses your Personal Information for the following purposes:

- Account Information for internal purposes, such as account establishment and supporting our services;
- Information that you provide through our website to respond to any communication you may direct to us;

- Employee Information to perform the Services for our clients;
- to understand, research, and improve our products and services;
- to communicate with you regarding customer service issues and/or service issues;
- to direct marketing communications to you about our company and our products and services that may be of interest to you;
- to enforce our Terms of Service and other legal agreements;
- to provide you with system or administrative messages;
- to meet legal and regulatory requirements; and
- for any other reasonable purposes for which you may have provided your express consent or in which your consent can be reasonably implied.

How Long Will We Retain Your Personal Information?

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collected the information or as required by law. We maintain a records retention and destruction program to destroy information when it is no longer needed or required.

Consent

We respect your privacy and, unless otherwise required by law, we will not collect, use, transfer or disclose your Personal Information without your prior consent. Your consent may be expressed or implied. You may expressly give your consent in writing, verbally or through any electronic means. In certain circumstances, your consent may be implied by your actions. In certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when Xennial Innovations wants to use information for a purpose other than those identified above). The form of consent sought by Xennial Innovations may vary, depending upon the circumstances and type of information disclosed. In determining the appropriate form of consent, Xennial Innovations shall take into account the sensitivity of the Personal Information and the reasonable expectations of our customers and Users. Xennial Innovations will seek express consent when the information is likely to be considered sensitive. Implied consent will generally be appropriate where the information is less sensitive.

Do We Disclose or Transfer Your Personal Information to Others?

We may share your Personal Information with our service providers that help us with our business operations. For example, we may transfer information with service providers who provide us with marketing and promotional services. We require our service providers to keep your Personal Information secure. In addition, our service providers may not use or disclose Personal Information for any purpose other than providing the services on our behalf unless we or they have obtained your consent.

We *do* disclose Employee Information to our client that you are employed by in order to provide the Services to our client.

We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of our business or as part of a corporate reorganization or stock sale or other change in corporate control.

Subject to the foregoing, only Xennial Innovations' employees, agents, contractors, service providers (and their employees and contractors) with a business need to know, or whose duties reasonably so require, are granted access to Personal Information about you. All such employees and contractors will be required as a condition of employment to contractually respect the confidentiality of Xennial Innovations' Users' Personal Information.

Xennial Innovations will disclose Personal Information without your knowledge or consent if Xennial Innovations receives an order, subpoena, warrant or other legal requirement issued by a court, tribunal, regulator, or other person with jurisdiction to compel disclosure of your Personal Information. If Xennial Innovations receives a written request from a police officer or other law enforcement agency with authority to request access to your Personal Information during an actual or potential investigation into a breach of a law, Xennial Innovations' policy is to provide the requested information.

How Do We Protect Your Personal Information?

We take administrative, technical, and physical measures to safeguard your personal information against unauthorized access, unauthorized disclosure, theft and misuse. This includes limiting access of employees to, and the use of, your Personal Information using passwords and graduated levels of clearance. We do not publish all our security measures online because this may reduce their effectiveness. We take physical precautions to ensure that the computer servers on which your Personal Information is stored and archived are secure and that access to such servers is protected. We educate our employees with respect to their obligations to protect your personal information and we require any third-party service providers to take comparable steps to ensure the protection of any of your personal information that is shared with them.

Although we take precautions against possible breaches of our security systems, no company can fully eliminate the risks of unauthorized access to your Personal Information and no website is completely secure. We cannot guarantee that unauthorized access, hacking, data loss or breaches of our security systems will never occur. Accordingly, you should not transmit Personal Information to us using our website if you consider that information to be sensitive.

Do We Collect Non-Identifiable and Aggregated Information and How Do We Use It?

Non-Identifiable and Aggregated information is data and information that is aggregated or anonymized in such a manner that it cannot be connected to you or any User. In some instances, Xennial Innovations may collect non-personal (e.g., aggregate or demographic) data through cookies. This information is used to better understand and improve the usability, performance and effectiveness of the inlinereferencecheck.ca website, as is further described below under "Cookies and Tracking Technology".

How Do You Access and Modify Your Personal Information or Make a Complaint?

If you have questions or concerns about Personal Information collected by us and would like assistance accessing that information, please contact our Privacy Office at: E-mail:

info@xennialinnovations.com

Xennial Innovations will respond to an application for individual access to Personal Information within a reasonable time and at minimal or no cost to the individual. An individual may challenge the accuracy and completeness of the information and have it amended as appropriate.

NOTE: In certain circumstances, Xennial Innovations may not be able to provide access to all of your Personal Information that it holds. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, or information that is subject to solicitor-client or litigation privilege. Xennial Innovations will provide the reasons for denying access upon request.

Cookies and Tracking Technology

Our Site may use the standard technology called a "cookie" to collect information about how you use the website.

A cookie is a small data file that is transferred to your hard drive and used for record-keeping purposes. A cookie file can contain information such as the URL you came from, your computer's IP address (i.e., the Internet address of your computer) and domain type (e.g., .com or .org, etc.), your browser type, the country, state and telephone area code where your server is located, the pages of our site that were viewed during a visit, and any search terms that you entered on our site. This information is used for internal purposes only, and we do not link your URL or IP address to any Personal Information unless you have logged into our website with a Inline Reference Check account login and password. In addition, Inline Reference Check's website does not allow other parties to collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the Inline Reference Check website.

If you would prefer not to receive cookies, you can alter the configuration of your browser to refuse cookies, although it is possible that some areas of our website will not function properly if you do so. You may be required to accept cookies to complete certain actions on the Site.

Regarding Children and Minors

Our website and the services offered on our website are not directed to children under the age of 18 years. We will not knowingly collect Personal Information about a child under the age of 18.

Storage Outside of Canada

Your Personal Information may be used or stored by us or our service providers outside of Canada. We require that our service providers safeguard your Personal Information. However, if your Personal Information is used or stored outside of Canada, it will also be subject to the laws of the country in which it is used or stored.

General

Xennial Innovations reserves the right to modify and amend this Privacy Policy from time to time in its sole discretion without prior notice to clarify our practices and to reflect new or different privacy practices, such as when we add new services, functionality or features to the Site. Any such amendment(s) will be posted on the Site and will be effective as of the date of posting. You can determine when this Privacy Policy was last revised by referring to the date it was “Last Updated” above.