



Entertainment  
Compliance  
Solutions

## DECS APP PRIVACY POLICY

**Effective Date:** December 1 2020 **Last modified:** December 1 2020

### INTRODUCTION

DISA Entertainment Compliance Solutions Inc. (the “Company,” “DECS,” “us”, “we”, or “our”) respects your personal information (which means information about you and that identifies you directly or indirectly) and are committed to protecting it through our compliance with this policy. This privacy policy describes:

- The types of personal information we may collect or that you, or your employer, may provide when you access or use the Company’s mobile application “MAPP” (the “App”); and
- Our practices for collecting, using, and disclosing that information.

Please read this policy carefully to understand how we collect, use, and disclose your information. If you do not agree with our policies and practices, do not download, register with, or use this App.

We may make occasional updates to this policy. We will inform you of any material changes. If you do not agree, understand, or accept those changes, please do not continue to use the App.

### CHILDREN

We do not knowingly collect information of children under the age of 18. If you are under the age of 18, you may not download the App or use the Services.

### INFORMATION COLLECTION

We collect information directly from you when you provide it to us during registration and automatically when you use the App. We also collect information from your employer and use it in conjunction with information collected via the App directly.

#### *Information You Provide to Us*

When you download and register for the App we will ask you to provide your first name, last name, email address, and date of birth. You may also provide information when communicating with us using the “Chat” function.

### ***Information We Collect from Your Employer***

We may collect the following information from your employer: driver ID, your signature, and hours of driving. This information is collected from your employer but was submitted by you via the "Driver Daily Log" form provided to you by your employer, our Client.

### ***Information Collected Automatically***

When you download, access, and use the App, it will use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.

### **HOW WE USE YOUR INFORMATION**

We use your personal information to:

- Provide you with the App and its contents, and any other information, products or services that you request from us.
- To provide driver compliance services to your employer under the applicable Master Services Agreement
- To run analytics (we provide your IP address to Google Analytics; when we obtain the reports, we only receive aggregated information, which is not linked to any users' of the App).
- To allow you to use your driver record with other employers.
- To administer your account and enforce our rights between you and us, including for billing and collection by third parties.
- If you choose to opt in to our mailing list, we may send you, from time to time, promotional information we think will be of interest to you. You will have the opportunity to opt out of those communications at any time following the instructions in the communication or by contacting us indicating your wishes [supportDECS@disa.com](mailto:supportDECS@disa.com).
- To send SMS text messages and push notifications to you for authentication purposes and, in some instances, for purposes related to your specific employment procedures. You have the ability to opt out of such notifications.

The usage and device information we automatically collect helps us to improve our App and to deliver a better experience by enabling us to:

- Estimate our audience size and usage patterns.
- Recognize when the App is used and which features are accessed.

We collect this information on an aggregated basis only and will not be linked with your personal information.

## **SHARING YOUR INFORMATION**

We will not sell your information. We will only share or disclose your information as follows:

- To contractors, service providers, third-party processors, and other third parties we use to deliver the Services.
- To a purchaser in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets.
- As may be required by law or as legitimately requested by law enforcement or pursuant to a legal obligation, in which case we will use reasonable efforts to provide notice to you.
- To your employer for the purposes of fulfilling our legitimate obligations under the relevant Master Services Agreement.
- When you move to another employer who is our client, you may choose to permit access to your personal information.

## **ACCESSING, CORRECTING, AND DELETING YOUR PERSONAL INFORMATION**

You may send us an email at [supportDECS@disa.com](mailto:supportDECS@disa.com) to request access to, correct, or delete any personal information that you have provided to us. We will accommodate your request within a reasonable time. Depending on the nature of the request, it may mean that you will no longer be able to use our Services via MAPP. In such cases, you may need to discuss alternatives with your employer. Please be aware that we may be required to retain certain information under applicable law.

If you delete the App from your mobile device, we will delete your account but may retain certain information, in accordance with applicable law and the provisions of this Privacy Policy.

## **DATA RETENTION**

We will retain information collected via MAPP for as long as we are providing Services to you with respect to such information. We will retain information for as long as it may be required under applicable laws and regulations. We will delete information when it is no longer required or three years after the prescribed regulatory retention period has ended, where applicable.

## **DATA SECURITY**

We follow industry recognized standards on information security management to safeguard your information. Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we follow all legal requirements and do our best to protect your personal information, we cannot guarantee you that it will be.

## **DATA TRANSFERS**

DECS is located outside of Canada and your personal information will be transferred to and accessed in the United States. Your employer may also be located outside of Canada and we

may disclose and transfer information outside of Canada in those cases. We may also use service providers who are located outside of Canada and your personal information will be processed in foreign jurisdictions, including the United States. Your data will be subject to the laws of those foreign jurisdictions. These laws may be less protective of data privacy and your data may be subject to access by foreign law enforcement agencies, which is outside of our control.

### **CHANGES TO OUR PRIVACY POLICY**

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will alert you to those changes.

### **COMPLAINTS**

If you have any complaints regarding our use of personal information, you can contact our privacy officer at [supportDECS@disa.com](mailto:supportDECS@disa.com). You are also entitled to contact the Office of the Information and Privacy Commissioner of British Columbia at 1-800-282-1376 (toll-free) if you wish to file a formal complaint.

### **CONTACT INFORMATION**

To ask any other questions or comment about this privacy policy and our privacy practices, contact us at [supportDECS@disa.com](mailto:supportDECS@disa.com).