

**Last updated: May 2020**

**Keiretsu Forum Canada  
Startup Visa Program  
Privacy Policy**

Keiretsu Forum Canada (“**Keiretsu**”, “**we**”, “**us**”, “**our**” and terms of similar meaning) take your privacy rights very seriously. We are committed to transparently describing our privacy practices, including how we collect, use and disclose data we obtain from your activity on the Keiretsu website available at [www.keiretsuforum.ca/startupvisa](http://www.keiretsuforum.ca/startupvisa) (“**Site**”) (collectively, the “**Services**”).

We encourage you to read and understand our privacy policy (“**Privacy Policy**”) before using the Services. By using the Services, you expressly consent to our collection, use and disclosure of your Data in accordance with this Privacy Policy. Our Privacy Policy applies to all visitors, users, and others who access the Services.

All capitalized terms that are not otherwise defined herein obtain their meaning from the Terms, available upon request.

### **1. What Data Do We Collect?**

We collect the following information from you (collectively, “**Data**”):

- (a) *General.* Your username, password, e-mail address and other personal information you provide when you register for a User Account. Profile information that you provide for your user profile and any Content that you post to the Services or transmitted to other users of our Services or third parties. We collect information provided in your settings, preferences and your search history on the Services.
- (b) *Usage Data.* Data from your activity and use of the Services.
- (c) *Analytics Information.* We may use third-party analytics tools to help us measure traffic and usage trends for the Services. These tools collect information sent by your device or our Services, including the web pages you visit, add-ons, and other information that assists us in improving the Services. We collect and aggregate this analytics information with information from other Users so that it cannot reasonably be used to identify any particular individual User.
- (d) *Cookies.* We may use cookies and similar technologies to collect information about how you use our Services and provide features to you. Third-party advertisers may use cookies or similar technologies placed by us to serve ads or services to your devices.

### **2. How Do We Use Your Data?**

We may also use your Data to provide to you the license for the Services; provide you with a personalized user experience and recommendations around content, other Users and improve the Services; fulfill the purposes for which you provided the Data or that were described when it was collected, or any other purpose for which you provide it; resolve service disputes; troubleshoot problems; to analyze usage of our Services; improve our content and product offerings; to allow Users to search, discover and connect with each other via the Service; detect and protect us against error, fraud and other criminal activities; provide you with system or administrative messages; and/or as otherwise described to you at the time of collection. These uses improve the Services and better tailor it to meet your needs, so as to provide you with a safe, smooth entertaining and customized experience while using the Services.

### **3. Our Disclosure of Your Data**

- (a) *General Disclosure.* We may share your Data with third parties only in the ways that are described in this Privacy Policy and in accordance with your consent.
- (b) *Subsidiaries, Affiliates & Service Providers.* We may use the services of subsidiaries, affiliates and third-party service providers (collectively, “**Third Parties**”) as reasonably necessary to provide our Services and/or off-premise data hosting. We may disclose your Data to the Third Parties in the course of our use of

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their services. We take care to use Third Parties that we believe are reputable and capable of performing the services we require of them, including, without limitation, the handling of confidential information and Data and the compliance with all applicable laws.

- (c) *Laws and Jurisdictions.* Notwithstanding anything to the contrary in this Privacy Policy, we may preserve or disclose your Data if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or any other person's or entity's rights or property. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your Data.
- (d) *Sale of Business.* We may disclose Data to the acquiror or its agents in the course of the sale of our business. If we do this, the disclosure will be subject to confidentiality arrangements customary in such transactions.
- (e) *Storing and Processing Your Data.* In some cases, Data that we collect may be stored or processed outside of the jurisdiction it is received. When that occurs, we continue to protect the Data with appropriate safeguards and data export requirements, but it may be subject to the legal jurisdiction of those countries and governmental authorities in those countries.
- (f) *Anonymized and Aggregated Data.* We may share aggregated, anonymized data, such as usage data, with our commercial partners, however such information will not enable you to be individually identified.

#### **4. Data Retention**

- (a) *General Retention Policy.* We will periodically de-identify (a) information from collected Data; and (b) unnecessary information from Data collected elsewhere on the Application and/or Site. Subject to this Privacy Policy, with the exception of aggregated Data, we may delete information and Data associated with it as prescribed by law.
- (b) *Termination of Access to Site.* If your access to the Services is terminated, we may retain your information and Data for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy.

#### **5. Your Data Rights**

In accordance with the applicable privacy laws, you may have the following rights with respect to your Data:

- (a) *Right of Access and Portability.* You may ask for an overview or copy of your Data to be provided to you; and/or transferred to another organization.
- (b) *Right to Erasure and Restriction.* You may ask us to remove and/or restrict our processing of your Content and/or Data in certain circumstances. Notwithstanding the foregoing, despite such request, subject to all applicable laws and the terms and conditions of this Privacy Policy, we may still retain your Content and Data for legitimate business interests, to collect any fees owed (if and as applicable), resolve disputes, troubleshoot problems, analyze usage of the Application and/or Site, assist with any investigations, prevent fraud, enforce our Terms and/or take other actions as required or permitted by law.
- (c) *Right to Object.* You may object to us processing your Data.
- (d) *Right to Withdraw Consent.* Where we have asked for your consent to use and/or process your Data (if applicable), you can withdraw this consent at any time. We will do our best to accommodate your request, subject to applicable laws and the terms and conditions of this Privacy Policy.

Please contact us at [info@keiretsuforum.ca](mailto:info@keiretsuforum.ca) if you would like to exercise any of the above rights.

#### **6. Children's Privacy**

**Last updated: May 2020**

Keiretsu does not knowingly collect or solicit any information from anyone under the age of thirteen (13) or knowingly allow such persons to register for a User Account. The Services and its Content is not directed at children under the age of 13. In the event we learn that we have collected personal information from a child under the age of thirteen (13) without parental consent, we will delete that information and/or Data as soon as practicable. We encourage Users to report to us where they believe that the Services has User Account or information from or about a child under thirteen (13).

## **7. Security**

We strive to protect your Data by putting in place a range of technical and organizational measures to safeguard and secure the Data we receive from you, including without limitation, security technologies. We are continuously utilizing security measures to protect your Data from unauthorized access or against loss, misuse or alteration. Despite our efforts, we cannot guarantee the security of your Data. Unauthorized entry or use, hardware or Services failure and other factors, may compromise the security of your Data at any time. We reserve the right, without any limitation, to investigate any suspected breaches of the Services' security or information technology or other systems or networks.

## **8. Other Information and Data Collectors**

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of Data we collect from you. To the extent that you disclose Data to other parties through the Service, different rules may apply to their use, collection and disclosure of Information and Data. Since we do not control the Data use, collection or disclosure policies of third parties, you are subject to their privacy policies. We encourage you to ask questions before you disclose Data to others.

## **9. Changes to This Privacy Policy**

Keiretsu may amend this Privacy Policy from time to time. The use of Data we collect is subject to the Privacy Policy in effect at the time the Data is used. If we make any material changes in the way we use your Data, we will notify you by (a) posting on the Services; or (b) messaging you directly using your Registration Data. Users of the Services are bound by any changes to the Privacy Policy when they use the Services after such changes have been first posted.

## **10. Questions?**

It is our goal to make our privacy practices easy to understand. If you have questions, concerns or if you would like more detailed information, please email us at [info@keiretsuforum.ca](mailto:info@keiretsuforum.ca).