

Privacy Policy

Privacy Policy Last Updated: 31-10-2022

ChrysaLabs Inc. and its affiliates, subsidiaries, and related entities (collectively, “**ChrysaLabs**”, “**we**”, “**our**”, or “**us**”), is committed to the protection of your privacy and the preservation of the confidentiality of your Personal Information (as defined below), which is why we have implemented a privacy program based on the best practices and appointed a Privacy Officer. The purpose of this privacy policy (the “**Privacy Policy**”) is to explain why and how ChrysaLabs collect, use, share, store, transfer and protect (collectively, “**Process**”) your Personal Information, as more fully described below.

1. ABOUT THIS PRIVACY POLICY

This Privacy Policy applies to any individual visiting or accessing pages on ChrysaLabs’s website (the “**Site**”) or any individual using ChrysaLabs’s platforms (the “**Platforms**”).

In order to provide you with quality services and relevant information, we must have access to certain Personal Information (as defined below) about you. We ensure that our employees manage this information with all the necessary discretion and rigour, and in compliance with the legal and regulatory requirements in force.

2. WHAT IS PERSONAL INFORMATION?

For the purpose of this Privacy Policy, “Personal Information” means any information about an identifiable individual, which includes information that can be used on its own or with other information to identify an individual. In general, Personal Information does not include business contact information, such as your name, title, or business contact information.

3. CONSENT

Generally, ChrysaLabs will obtain the necessary Personal Information directly from you with your consent, subject to the exceptions provided by law.

By providing us with Personal Information, through our Site or Platforms, you consent to the Processing of your Personal Information in accordance with this Privacy Policy.

ChrysaLabs will not Process Personal Information without your consent unless it is permitted or required to do so by applicable regulations. Where required, ChrysaLabs may share your Personal Information with regulatory bodies with whom it must cooperate and who govern its activities. For example, ChrysaLabs may need to proceed without your consent where, for reasons of fraud detection or prevention or law enforcement, seeking the individual's consent would defeat the purpose.

a. Refusal of collection and withdrawal of your consent

Depending on the applicable laws, you have the right, if you so choose, to refuse the Processing of your Personal Information. You may also, at any time, and subject to reasonable notice and applicable legal or contractual restrictions, withdraw your consent

to the use of Personal Information in our possession by contacting our Privacy Officer. You should be aware, however, that if you choose not to provide us with your Personal Information, this may prevent us, for example, from providing or continuing to provide you with some of our services, as this information is essential to the provision of such service.

Please note, however, that anonymized, non-identifying information will be retained. You may contact ChrysaLabs as set forth in the Section "[How to contact us?](#)" to address any issue thereof.

b. Use for secondary purposes

ChrysaLabs may also ask for your consent to use your Personal Information for secondary purposes, such as market research or database purposes. As noted above, we will ask for your consent in this regard. In addition, your consent for secondary use may be withdrawn at any time without affecting the provision of our services to you.

ChrysaLabs may also aggregate and anonymize Personal Information that you have provided to create statistical data which ChrysaLabs may use to improve its services, examine trends and interests, or share with its third-party partners. Such statistical data does not include any Personal Information.

4. WHAT PERSONAL INFORMATION DO WE COLLECT?

In the course of our business and service delivery, meaning when you visit our Site, use our Platforms or when you interact with us, Personal Information collected may include, but is not limited to:

- Contact information (when using our forms, e.g., your name, email, phone number, affiliation);
- Technical information (e.g., time and date of visits, geo-location data, length of time spent on the Site or Platforms and pages clicked on, provenance and IP address).

5. WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

For specific and limited Purposes

ChrysaLabs generally collects your Personal Information to:

- Provide our services through our Platforms;
- Respond to your queries or questions;
- Respond to your requests for information, questions, complaints or comments;
- Customize content for your own experience;
- Facilitate the use of our Site and Platforms, ensure their relevance and track usage;
- As permitted or required by any applicable legal or regulatory obligation or provision;
- Any other purpose to which you have consented.

(collectively, the “**Purposes**”)

When Personal Information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified and documented prior to Processing, and ChrysaLabs will provide you, prior to that further Processing, with information on that other purpose and with any relevant further information.

6. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

a. Directly from you

Generally, we will collect the Personal Information that we need directly from you, for example when you communicate with us. We may also gather information that is generated by your mobile and/or computer devices (e.g., mobile advertising identifiers, location information and IP address) or when you mention us on social media. For more information, please refer to the Section “[How do we provide online advertising?](#)”.

b. With a legal basis such as your consent

The legal basis to Process your Personal Information is typically because you have consented to it, unless otherwise provided by the applicable laws (e.g., for the purpose of complying with our legal obligations, where necessary for establishing, exercising, or defending a legal claim, a prospective legal claim, legal proceedings or prospective legal proceedings.).

7. WHO WE SHARE YOUR PERSONAL INFORMATION WITH?

ChrysaLabs does not rent nor sell any of your Personal Information to third parties and will not share it with third parties without your consent unless it is necessary to do so by law or for the Purposes as set forth below.

For more clarity, here are some examples of situations where it is necessary for us to share such information:

a. With our employees

In the course of their work, our employees may need to access your Personal Information, for example, when you contact us or request support. Their access is limited to what is necessary to perform their duties.

b. With strategic partners

ChrysaLabs may share your Personal Information with its partners, such as business affiliates to the extent that such disclosure is required for the Purposes. ChrysaLabs may also share your Personal Information with others to help us provide our services (maintenance, analysis, legal requirement, fraud detection and development). Where ChrysaLabs utilizes third parties for the processing of any Personal Information, ChrysaLabs implements reasonable contractual and technical protections, such as Privacy Impact Assessments, in order for such third parties to keep all Personal Information they Process strictly confidential. Please note that these third parties may be located elsewhere than your location in which case, appropriate measures are taken by ChrysaLabs as set forth below in the Section “[Where is your Personal Information stored and transferred?](#)”

c. When required by applicable laws

ChrysaLabs may also share your Personal Information if required to do so by law or in the good faith belief that such action is necessary to: (i) conform with the law; (ii) comply with the order of a competent judicial authority in any jurisdiction; (iii) comply with legal process served on ChrysaLabs; (iv) protect and defend the rights or property of ChrysaLabs; (v) enforce or verify your compliance with any part of the agreements that you have entered into with ChrysaLabs, if any; (vi) prevent fraud or other illegal activity perpetrated through the Service; or (vii) act in urgent circumstances to protect the personal safety of users of our services or the public at large.

d. During business transfer

We may share your Personal Information without your permission when our operations require it (in the event of a merger, acquisition, bankruptcy, or sale of assets, for example). As part of this kind of event, we may share some or all of your Personal Information to the relevant third-party (or its advisors) as part of a due diligence process.

e. For other purposes with your consent

Where you have expressly consented, your Personal Information may be shared with other third parties. For example, if you provide us with a review or comment that is deemed to be a Personal Information, you authorize us to publish it on all of our Platforms or Site and thus, share that information. You also authorize us to aggregate it with other reviews. There may also be specific instances where additional terms apply and, through these, we make clear that specific third parties Process your Personal Information.

8. LINKS TO OTHER SITES

We may establish links to third party sites or services that we do not control. If you click on one of these links, you will be directed to sites that are beyond our sphere of influence. Please read the privacy policies of these third-party websites, applications or platforms that may collect Personal Information in order to understand their privacy policies and data collection practices. This Privacy Policy applies solely to Personal Information processed by ChrysaLabs or on its behalf. We are not responsible for these third party sites, their content or access to them. Therefore, any Personal information you submit through these sites is subject to their privacy policies. It is your responsibility to read their privacy policies to ensure the protection of your Personal information.

9. HOW DO WE USE COOKIES?

A cookie is a small text file that is stored in a dedicated location on your computer, mobile device, tablet or other device when you use your browser to visit an online service. Other tracking technologies, such as web beacons and tracking pixels may be used for similar purposes. For reference, web beacons and pixels are tiny images that we can place in our web pages, Platforms or emails. They can be used, for example, to anonymously track the number of times a particular page has been visited by a user. As the name implies, web beacons are invisible and any part of our Platform, including advertisements displayed on our Platforms, may contain web beacons. Unlike cookies, web beacons are not placed on your computer. In this Privacy Policy, all of these tracking technologies are collectively referred to as “**Cookie(s)**”. Any Personal Information collected with Cookies by ChrysaLabs or on its behalf are treated with the same level of confidentiality as any other Personal Information held by ChrysaLabs.

a. Essential Cookies

These cookies are necessary for the Site to function and cannot be switched off in our systems without impacting how the Site functions. Strictly necessary Cookies must be present for the Site to provide basic functions and could include signing in to our Platforms, maintaining your session and prevent security threats. However, if you so choose, you can block or delete them by changing your browser settings and force blocking all cookies on the Site.

b. Non-essential Cookies

Non-essential Cookies provide some non-essential functionalities on our Site, for functional, analytic or advertising purposes. ChrysaLabs will ask for your consent before using any non-essential Cookies.

- o Functional Cookies. We use these Cookies to help with non-essential functionalities on our Site, like embedding content like videos or sharing content of the Site on social media platforms.
- o Advertising Cookies. Our Site displays advertisement. These Cookies help us track the efficiency of our ad campaigns and help us personalize our advertisement so that they are meaningful to you.
- o Analytic Cookies. These Cookies store information such as the number of visitors on our Site or which page they have visited. This helps us understand and analyze the performance of our Site and where it might need improvement

c. How to Manage Cookies

Cookies can be managed and/or disabled through your browser's Cookie settings and mobile device's advertising settings.

However, if you refuse Cookies, you may not be able to use all the features of the Site or the Platforms. If you want more information about how to manage and/or disable non-essential Cookies, please visit <http://www.allaboutcookies.org/manage-cookies/>, and <http://optout.aboutads.info/?c=2&lang=EN>.

10. HOW DO WE PROVIDE ONLINE ADVERTISING?

a. With the use of Cookies or with mobile advertising identifiers

ChrysaLabs and its third-party partners may collect your Personal Information to provide advertisements about goods and services and may work with online advertising companies to introduce you to relevant and useful advertisements. Such Personal Information is collected as set forth above in the Section "[How do we use Cookies?](#)" or directly from you when using the Site or Platforms and as clearly outlined.

Depending on the preferences that you have expressed in your mobile devices, ChrysaLabs and its advertising partners may also use your mobile advertising identifier to target and measure the effectiveness of their advertising campaigns. In iOS, this identifier is called "IDFA" (ID for Advertising); in Android (Google Play), this identifier is called "AAID" (Android Advertising ID). You can access and reset your mobile advertising identifier or limit its use through the settings on your mobile devices' operating system.

In no event will we permit advertising directed at children where we have actual knowledge that the user is under the age of 13. To learn more about our advertising practices, please contact use as set forth in the Section [“How to contact us?”](#).

b. Do Not Track

Web browsers can transmit Do Not Track (“DNT”) signals that indicate that a user does not wish to have their activity tracked over time and across websites. Currently, no universally accepted standard exists for how to interpret such signals, although work to create consensus is ongoing. Accordingly, we do not respond to such DNT signals.

11. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

ChrysaLabs will retain your Personal Information only for as long as necessary to fulfill the Purposes for which it was collected, in accordance with our internal document retention policies, as required for ChrysaLabs’s legitimate interests, or to comply with applicable legal, tax or regulatory requirements. After such time, any Personal Information held by ChrysaLabs will be destroyed, deleted, or made anonymous.

Strict procedures for the retention of your Personal Information are followed and we will dispose of Personal Information that is no longer required by ChrysaLabs for the identified Purposes. If you would like more information on this topic, we invite you to contact us as set forth in the Section “How to contact us?”.

12. Children's Privacy

Our Site, or Platforms, is intended for persons 18 years of age or older. We do not knowingly process Personal Information of minors. If you believe that we have collected Personal Information directly from minors, or if you are a parent or legal guardian and believe that your minor child has provided us with Personal Information, you may contact us as described in the Section "How to contact us ?".

13. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

ChrysaLabs has security measures in place to protect your Personal Information. We strive to apply the necessary and appropriate security measures to ensure the confidentiality of the Personal Information in our possession. The standard security measures we use will depend on the type of information collected. However, ChrysaLabs uses physical, electronic, and procedural safeguards that comply with applicable regulations to protect your Personal Information. Such appropriate physical, technical and/or administrative safeguards and security measures have been implemented and are maintained to prevent:

- Any accidental or unlawful destruction;
- Any accidental loss;
- Any unauthorized disclosure;
- Unauthorized modification;
- Unauthorized access; and
- Unlawful processing.

ChrysaLabs will make its employees aware of the importance of maintaining the confidentiality of Personal Information, and care will be used in the disposal or destruction of Personal Information, to prevent unauthorized parties from gaining access to the Personal Information. Moreover, we make sure that we restrict access to our offices and computer equipment, train our employees and require our agents and suppliers of goods and services with access to Personal Information to sign confidentiality agreements and implement security measures deemed equivalent.

It should be noted, however, that no method of transmission over the Internet, nor any means of electronic storage, is completely secure. Thus, we encourage you to be cautious when using the Internet. This includes not sharing your passwords. If you believe that your Personal Information has been compromised, please contact us as set forth in the Section [“How to contact us?”](#).

14. WHERE IS YOUR PERSONAL INFORMATION STORED AND TRANSFERRED?

Your Personal Information may be held by ChrysaLabs in locations other than your province, territory, state, or country of residence, including in Canada (including in the provinces of Quebec), and the United States. ChrysaLabs may also subcontract processing to or share your Personal Information with third parties located elsewhere, including locations other than your province, territory, state, or country of residence. In such case, ChrysaLabs will ensure that your Personal Information is transferred to countries that have received an adequacy decision from the competent authority, or that your Personal Information is adequately protected by appropriate technical, organizational, contractual, or other lawful means. If you would like to obtain more information on these security measures, please contact ChrysaLabs as set forth in the Section [“How to contact us?”](#).

15. WHAT ARE YOUR RIGHTS?

Depending on applicable laws, you might have the right to obtain access to, rectification or erasure of your Personal Information, the right to withdraw your consent (if any), the right to be informed of a decision based exclusively on an automated processing automated decision (if any), the right not to be discriminated against, the right to restrict and to object to the use and processing of your Personal Information by ChrysaLabs, or the right to data portability by, namely, receiving a copy of all Personal Information that ChrysaLabs has about you in a structured, commonly used and machine-readable format.

To exercise any of these rights (to the extent available), please submit your request to us by writing to the Privacy Officer as set forth in the Section [“How to contact us?”](#). Depending on the right being exercised, we will inform you of the procedure to follow, the processing time (delay of response) and the information needed.

16. PERSONAL INFORMATION MANAGEMENT PROGRAM

In order to protect your Personal Information, we have put in place policies, practices and procedures relating to the management of the Personal Information we hold.

These internal policies and procedures govern the collection, use, disclosure, retention and destruction of Personal Information, as well as complaint handling, information security and data governance. These policies and practices also provide the framework for the implementation of Privacy Impact Assessments, as well as the prevention of and response to potential privacy incidents. All of these policies and practices have been approved by our Data Protection Officer.

The collection of your Personal Information through our application complies with the requirements of this program.

17. PRIVACY OFFICER

ChrysaLabs's senior management has delegated the management of the privacy program to the Privacy Officer. The Privacy Officer is responsible for the internal management and oversight of ChrysaLabs's privacy program.

The Privacy Officer is responsible for approving and implementing privacy policies and procedures, ensuring that they are functioning properly, and reporting to ChrysaLabs's senior management on the effectiveness of the program.

It is also the responsibility of the Privacy Officer to provide you with the necessary support in the event of a question, complaint or request relating to the protection of personal information. You can contact the Privacy Officer as set forth in the Section "[How to contact us?](#)".

18. HOW TO CONTACT US?

You may contact us to exercise your [rights](#), or if you have questions about our privacy practices or need assistance with exercising or understanding your privacy choices.

For inquiries, please contact us at info@chrysalabs.com, or you may write to:

ChrysaLabs Inc.
Attn: ChrysaLabs Privacy Officer
9310 St. Laurent Blvd, Suite 1114
Montreal, Quebec H2N 1N4
Canada

ChrysaLabs would like you to know that we are committed to responding promptly and accurately to all your questions and concerns about the privacy and security of your Personal Information and our privacy policies and procedures.

In the event that you have a complaint regarding the exercise of your rights under this Privacy Policy, your file will be handled by ChrysaLabss Privacy Officer's office, who will inform you of the procedures to follow. Each complaint will be investigated. If the complaint is justified, the specific situation will be corrected, and you will be informed.

19. CHANGES TO THIS PRIVACY POLICY

ChrysaLabs frequently revises this Privacy Policy to keep it up to date with applicable legislation and its operations. If material changes are made to the Privacy Policy, then update notices (such as online notices or emails) may be used to alert you of such changes. Otherwise, the posting of the revised Privacy Policy on the Site and/or Platforms shall be considered sufficient notice to you, and by continuing to use the Site, the Platforms or by submitting Personal Information to us, you are consenting to any changes to our Privacy Policy.