



## Privacy Policy

### Introduction

The protection of our user's personal information and privacy is important to all of us at RHA Ventures.

RHA Ventures has created this Privacy Policy (the "Policy") to solidify our commitment to the privacy and security of your personal information. This Policy has been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). PIPEDA sets out rules for collection, use, and disclosure of personal information during the course of commercial activity, as defined by the Act.

### Ten Principles of PIPEDA

The ten principles of PIPEDA that shape the basis of this Policy are as follows:

1. **Accountability:** Organizations are responsible for the personal information they collect, use, retain and disclose during their commercial activities, including, but not limited to, the appointment of a Chief Privacy Officer (the "CPO").
2. **Identifying Purposes:** Organizations must explain the purposes for which the information is being used at the time of collection and can only be used for those purposes.
3. **Consent:** Organizations must obtain an individual's express or implied consent, depending on the sensitivity of the information, when they collect, use, or disclose the individual's personal information.
4. **Limiting Collection:** Organizations should only collect personal information that is necessary for the purposes they have identified. They must collect information fairly and lawfully.
5. **Limiting Use, Disclosure and Retention:** Personal information must only be used for the identified purposes and must not be disclosed to third parties unless the individual consents to the alternative use or disclosure.

6. Accuracy: Organizations are required to keep personal information in active files accurate and up to date. Individuals have the right to request corrections to their information.
7. Safeguards: Organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.
8. Openness: Organizations must be open about their privacy policies and practices, making them easily accessible to individuals. They must inform individuals about their policies and procedures for managing personal information.
9. Individual Access: An individual has a right to access personal information held by an organization and to challenge its accuracy if need be.
10. Provide Recourse: Organizations are to inform clients and employees of how to bring a request for access, or complaint, to the CPO, and respond promptly to a request or complaint by the individual.

This Policy applies to all directors, officers, and employees of RHA Ventures. As well, RHA Ventures will endeavour to have third-party service providers sign confidentiality agreements prior to any transfer of an individual's personal information.

### **Purposes of Collecting Personal Information**

RHA Ventures will communicate the purposes for which personal information is being collected, either before or at the time of collection. The collection of personal information includes but is not limited to the following purposes:

- Verifying identity
- Understanding the financial needs of investors
- Delivering a high standard of service
- Meeting regulatory requirements
- Opening and managing accounts
- Identifying investor preferences

RHA Ventures will obtain client consent to collect, use, or disclose personal information. Consent can be given orally, in writing, electronically, or through an authorized representative. Consent can be implied in circumstances where it would be considered reasonably obvious that the client voluntarily provided personal information for the specified purpose.

RHA Ventures will collect personal information from potential investees and investors for recruiting related purposes. The application intake form found on our website will collect various information pertaining to personal identity and respective company profiles and business plans. RHA Ventures will use the information provided in the ordinary course of business, i.e., managing venture capital funds, evaluating potential investments, and supporting our portfolio companies, and only in the context in which we have been instructed. Potential investees and

investors have the right to access the data we have collected and can contact us further for a request to access, change or delete personal data.

### **Use of Personal Information**

By limiting the collection of personal information, RHA Ventures will only gather purposeful data. Personal information will only be used for the purposes to which the individual has consented. As permitted by PIPEDA, the following are exceptions to gaining consent to the use of personal information:

- the organization has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law and the information is used for that investigation;
- an emergency exists that threatens an individual's life, health or security;
- the information is for statistical study or research;
- the information is publicly available;
- the use is clearly in the individual's interest, and consent is not available in a timely way;
- knowledge and consent would compromise the availability or accuracy of the information, and
- collection is required to investigate a breach of an agreement.

RHA Ventures will not use or disclose client, customer, member personal information for any additional purpose unless given consent to do so. RHA Ventures is committed to protecting its clients' personal information in full compliance with this Policy and applicable laws.

RHA Ventures uses Google Analytics to collect user device's IP address, browser type, browser version, the parts of our Site or App that are visited, the date and time of user visits, the time spent on those parts, unique device identifiers, and other diagnostic data when users visit and use our Site. Google shares its collected information with other Google services, and Google may use the collected data to contextualize and personalize the ads of its own advertising network. More detailed information on the privacy practices of Google, can be found in Google Privacy & Terms web page: <https://policies.google.com/privacy>.

RHA Ventures also employs the use of Mailchimp and HubSpot tools within our marketing practices. Mailchimp is a marketing automation platform and e-mail marketing service that allows RHA Ventures to manage and track e-mail campaigns. HubSpot is an inbound marketing platform that provides a suite of tools and features to manage customer service efforts. The Privacy and Legal Policies of both tools can be found at: <https://mailchimp.com/legal/> and <https://legal.hubspot.com/privacy-policy>, respectively.

## **Individual Rights**

Individuals have a right to access their personal information, subject to certain exceptions. Exceptions to granting access to personal information may include the following: information that is disproportionately costly, information that contains reference to other individuals, information that is subject to solicitor-client privilege, and information that cannot be disclosed due to commercial proprietary reasons.

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the CPO. We will make the requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the personal information request.

If a request is refused in full or in part, we will notify the client in writing, providing the reasons for refusal and the recourse available to the client.

## **Breaches of Security Safeguards**

As enforced by PIPEDA, RHA Ventures is required to report any breach of an individual's information to the Office of the Privacy Commissioner ("OPC") if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to an individual.

In determining the real risk of significant harm, the factors that RHA Ventures will consider is twofold; (1) the sensitivity of the personal information involved in the breach, and (2) the probability that the personal information will be misused.

If a breach occurs, RHA Ventures will notify any organization or government institution of the breach if RHA Ventures believes that the other party may be able to reduce the risk of harm.

RHA Ventures will maintain records of every breach involving personal information under its control, even if there is no obligation or duty to report to the OPC.

## **Links to Other Sites**

This Policy does not extend to the practices employed by websites linked to or from this site. RHA Ventures is not responsible for outside sites, their omissions, or for the policies or content of their respective websites.

## **Children's and Teen's Privacy**

RHA Ventures does not knowingly collect or solicit personal information from persons under the age of 18 or knowingly allow such persons to register with the service. If we become reasonably aware that we have indirectly collected personal information from a minor, we take steps to remove that information.

### **Changes to this Policy**

RHA Ventures may update this Policy periodically to reflect the changes in our practices or for other means that are necessary. If we change our Policy, we will post those changes on this page to keep you aware of our most up to date policies on information collection, usage, and disclosure. Changes to this Policy are only effective when they are posted on this page, and we are not obligated to provide notice of any such change.

### **Contact**

If an individual has any questions, concerns, or complaints pertaining to the practice of this Policy, inquiries can be directed to the CPO and be made at • [ADMIN EMAIL](#) or by mail to: • [ADDRESS OF CHOICE](#)