

## **Privacy Statement, effective as of May 1, 2014**

Customer Connect ("Customer Connect", "360Home" or the "Company") is committed to protecting the privacy of individuals who visit the Company's Web sites ("Visitors"), individuals who register to use the Services as defined below ("Customers"), and individuals who register to attend the Company's corporate events ("Attendees"). This Privacy Statement describes Customer Connect's privacy practices in relation to the use of the Company's Web sites and the related applications and services offered by Customer Connect (the "Services").

Customer Connect complies with third-party website and online requirements including transparency, accountability, and choice regarding the collection and use of your personal information. Customer Connect's mission, as an independent third party, is to gather customer and business intelligence with the goal of improving client and industry performance through its leading innovative solutions. If you have questions or complaints regarding Customer Connect's Privacy Statement or associated practices, please contact us.

### **1. Web sites covered**

This Privacy Statement covers the information practices of Web sites that link to this Privacy Statement, including: <https://customer-connect.ca> (collectively referred to as "Customer Connect's Web sites" or "360Home" or "the Company's Web sites").

Applications may be posted by Customer Connect and third parties. When applications are posted by Customer Connect and the application links to this Privacy Statement, this Privacy Statement applies.

Customer Connect's Web sites may contain links to other Web sites. The information practices or the content of such other Web sites is governed by the privacy statements of such other Web sites. The Company encourages you to review the privacy statements of other Web sites to understand their information practices.

### **2. Information collected**

When expressing an interest in obtaining additional information about the

Services or registering to use the Services, Customer Connect requires you to provide the Company with personal contact information, such as name, company name, address, phone number, and email address ("Required Contact Information"). When purchasing the Services, Customer Connect may require you to provide the Company with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services ("Billing Information"). Customer Connect may also ask you to provide additional information, such as company annual closings, number of employees, or industry ("Optional Information"). Required Contact Information, Billing Information, and Optional Information about Customers are referred to collectively as "Data about Customer Connect Customers", or in the case of Attendees, "Data about Customer Connect Attendees".

As you navigate the Company's Web sites, Customer Connect may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons ("Web Site Navigational Information"). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Company's Web sites (such as the Web pages viewed and the links clicked). For additional information about the collection of Web Site Navigational Information by Customer Connect and others, please contact us.

### **3. Use of information collected**

The Company uses Data about Customer Connect Customers to perform the services requested. For example, if you fill out a "Contact Me" Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company also uses Data about Customer Connect Attendees to plan and host corporate events, host online surveys, focus groups, forums and social networks in which event attendees may participate, and to populate online profiles for Attendees on the Company's Web sites. We only collect personal information that is strictly necessary for the purposes outlined in this privacy policy. Generally we collect personal information from Attendees directly or from our business partners such as new home builders, warranty providers, or industry regulators. This information could be collected in person, over the telephone, through the mail, or

by electronic means, under the assumption that the builder, warranty provider or industry regulator has obtained the Attendees consent for us to obtain their customer's personal information and conduct research on behalf of that organization. We only collect, use, or disclose personal information for the purposes we believe the Customers and Attendees would consider appropriate under the circumstances. Both Customer and Attendee's knowledge and consent are required for the collection, use, or disclosure of personal information unless permitted or required by law. Of course, subject to reasonable and lawful limits, any Customer or Attendee can choose not to provide us with some or all personal information. However this choice may prevent us from providing the product, service or information that has been requested.

The Company may also use Data about Customer Connect Customers and Data about Customer Connect Attendees for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

Customer Connect uses credit card information solely to check the financial qualifications and collect payment from prospective Customers and Attendees.

Customer Connect uses Web Site Navigational Information to operate and improve the Company's Web sites. The Company may also use Web Site Navigational Information alone or in combination with Data about Customer Connect Customers and Data about Customer Connect Attendees to provide personalized information about the Company. For additional information about the use of Web Site Navigational Information, please contact us.

#### **4. Web site Navigational Information**

##### **Cookies, Web Beacons and IP Addresses**

Customer Connect uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Web sites ("Web Site Navigational Information"). This section describes the types of Web Site Navigational Information used on the Company's Web sites and how this information may be used.

##### **Cookies**

Customer Connect uses cookies to make interactions with the Company's Web sites easy and meaningful. When you visit one of the Company's Web sites, Customer Connect's servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to Customer Connect, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Contact Me" or a "Live Chat" Web form), you remain anonymous to the Company.

Customer Connect uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your Web browser's ability to accept cookies, you will be able to navigate the Company's Web sites, but you will not be able to successfully use the Services.

The following sets out how Customer Connect uses different categories of cookies and your options for managing cookies' settings:

<b>Type of Cookies</b>	<b>Description</b>	<b>Managing Settings</b>
<b>Required</b>	Required cookies enable you to navigate	Because required cookies

<p><b>cookies</b></p>	<p>the Company's Web sites and use its features, such as accessing secure areas of the Web sites and using Customer Connect Services.</p> <p>If you have chosen to identify yourself to Customer Connect, the Company uses cookies containing encrypted information to allow the Company to uniquely identify you. Each time you log into the Services, a cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These cookies allow the Company to uniquely identify you when you are logged into the Services and to process your online transactions and requests.</p>	<p>are essential to operate the Company's Web sites and the Services, there is no option to opt out of these cookies.</p>
<p><b>Performance cookies</b></p>	<p>These cookies collect information about how Visitors use our Web site, including which pages visitors go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies a Visitor. All information these cookies collect is aggregated and anonymous. It is only used to improve how the Company's Web site functions and performs. From time-to-time, Customer Connect engages third parties to track and analyze usage and volume statistical information from individuals who visit the Company's Web sites. Customer Connect may also utilize Flash cookies for these purposes.</p>	<p>To learn how to opt out of performance cookies using your browser settings.</p> <p>To learn how to manage privacy and storage settings for Flash cookies by contacting us.</p>
<p><b>Functionality cookies</b></p>	<p>Functionality cookies allow the Company's Web sites to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of Customer Connect's Services after logging in. These cookies can also be used to remember changes you</p>	<p>To learn how to opt out of functionality cookies using your browser settings contact us. Note that opting out may impact the functionality you receive when visiting Customer Connect.</p> <p>To learn how to manage</p>

	<p>have made to text size, fonts and other parts of web pages that you can customize. Customer Connect uses local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on our Web sites to personalize your visit.</p>	<p>privacy and storage settings for Flash cookies contact us.</p>
<p><b>Targeting or Advertising cookies</b></p>	<p>From time-to-time, Customer Connect engages third parties to track and analyze usage and volume statistical information from individuals who visit the Company's Web sites. Customer Connect sometimes uses cookies delivered by third parties to track the performance of Company advertisements. For example, these cookies remember which browsers have visited the Company's Web sites. The information provided to third parties does not include personal information, but this information may be re-associated with personal information after the Company receives it. Customer Connect also contracts with third-party advertising networks that collect IP addresses and other information from Web beacons (see below) on the Company's Web sites, from emails, and on third-party Web sites. Ad networks follow your online activities over time by collecting Web Site Navigational Information through automated means, including through the use of cookies. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other Web sites. This process also helps us manage and track the effectiveness of our marketing efforts.</p> <p>Third parties, with whom the Company partners to provide certain features on our Web sites or to display advertising based upon your Web browsing activity, use Flash</p>	<p>To learn more about these and other advertising networks and their opt-out instructions, contact us. To learn how to manage privacy and storage settings for Flash cookies contact us.</p>

	cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.	
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**Web Beacons**

Customer Connect uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Web sites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site tied to the Web beacon, and a description of a Web site tied to the Web beacon. For example, Customer Connect may place Web

beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company's Web sites. Customer Connect uses Web beacons to operate and improve the Company's Web sites and email communications.

## **IP Addresses**

When you visit Customer Connect's Web sites, the Company collects your Internet Protocol ("IP") addresses to track and aggregate non-personal information. For example, Customer Connect uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company's Web sites.

Customer Connect also collects IP addresses from Customers when they log into the Services as part of the Company's "Identity Confirmation" and "IP Range Restrictions" security features.

## **5. Public forums, refer a friend, and customer testimonials**

Customer Connect may provide bulletin boards, blogs, or chat rooms on the Company's Web sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. Customer Connect is not responsible for the personal information you choose to submit in these forums.

Customer Connect posts a list of Customers and testimonials on the Company's Web sites that contain information such as Customer names and titles. Customer Connect obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## **6. Sharing of information collected**

### **Service Providers**

Customer Connect may share Data about Customer Connect Customers and Data about Customer Connect Attendees with the Company's contracted



service providers so that these service providers can provide services on our behalf. Customer Connect may also share Data about Customer Connect Customers with the Company's service providers to ensure the quality of information provided. Unless described in this Privacy Statement, Customer Connect does not share, sell, rent, or trade any information with third parties for their promotional purposes. Customer contact information, including but not limited to homeowner information is held in strict confidentiality and not shared with any third party.

### **Customer Connect Affiliates**

The Company may share Data about Customer Connect Customers with other companies in order to work with them, including affiliates of the Customer Connect corporate group. For example, the Company may need to share Data about Customer Connect Customers for customer relationship management purposes.

### **Business Partners**

From time to time, Customer Connect may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from Customer Connect, the Company may share Data about Customer Connect Customers collected in connection with your purchase or expression of interest with our joint promotion partner(s). Customer Connect does not control our business partners' use of the Data about Customer Connect Customers we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service.

Customer Connect does not share Data about Customer Connect Attendees with business partners unless: (1) you specifically opt in to such sharing via an event registration form; or (2) you attend a Company event and have your attendee badge scanned by a business partner. If you do not wish for your information to be shared in this manner, you may choose not to opt in via event registration forms and elect not to have your badge scanned at Company events. If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy statements.

## **Billing**

Customer Connect typically invoices customers for services; however, at times, a third-party service provider to manage credit card processing may also occur. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

## **Compelled Disclosure**

Customer Connect reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

## **7. International transfer of information collected**

To facilitate Customer Connect's global operations, the Company may transfer and access Data about Customer Connect Customers and Data about Customer Connect Attendees from around the world, including the United States. This Privacy Statement shall apply even if Customer Connect transfers Data About Customer Connect Customers or Data About Customer Connect Attendees to other countries.

## **8. Communications preferences**

Customer Connect offers Visitors, Customers, and Attendees who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" or "opt-out" link located on the bottom of the Company's marketing emails. Additionally, you may send a request specifying your communications preferences to [info@customer-connect.ca](mailto:info@customer-connect.ca). Customers cannot opt out of receiving transactional emails related to their account with Customer Connect or the Services.

## **9. Correcting and updating your information**

Customers may update or change their registration information by editing their user or organization record. To update a user profile, please login to <https://www.customer-connect.ca> with your Customer Connect username

and password and click "Settings." To update an organization's information. Attendees may update or change their registration information on the event's Web site after logging in.

## **10. Customer Data**

Customer Connect Customers may electronically submit data or information to the Services for hosting and processing purposes ("Customer Data"). Customer Connect will not review, share, distribute, or reference any such Customer Data except through consent by Customer, PHBI, ANHWP, as provided in the Customer Connect Master Subscription Agreement, or as may be required by law. In accordance with the Customer Connect Master Subscription Agreement, Customer Connect may access Customer Data only for the purpose of providing the Services, preventing or addressing service or technical problems, at a Customer's request in connection with customer support matters, or as may be required by law.

## **11. Security**

Customer Connect uses robust security measures to protect Customer Data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of Customer Data. When the Services are accessed using Internet Explorer version 7.0 or later, Firefox version 2.0 or later, or Safari version 3.0 or later, Secure Socket Layer (.SSL.) technology protects Customer Data using both server authentication and data encryption. These technologies help ensure that Customer Data is safe, secure, and only available to the Customer to whom the information belongs and those to whom the Customer has granted access. Customer Connect also implements an advanced security method based on dynamic data and encoded session identifications, and the Company hosts its Web sites in a secure server environment that uses firewalls, intrusion detection systems, and other advanced technology to prevent interference or access from outside intruders. Customer Connect also offers enhanced security features within the Services that permit Customers to configure security settings to the level they deem necessary. Customers are responsible for maintaining the security and confidentiality of their Customer Connect usernames and passwords.

Because the Company uses the Services to maintain Data about Customer Connect Customers and Data about Customer Connect Attendees, this

information, which is stored in the Services, is secured in the same manner as described above for Customer Data.

## **12. Changes to this Privacy Statement**

Customer Connect reserves the right to change this Privacy Statement. Customer Connect will provide notification of the material changes to this Privacy Statement through the Company's Web sites at least thirty (30) business days prior to the change taking effect.

## **13. Contacting Us**

Questions regarding this Privacy Statement or the information practices of the Company's Web sites should be directed to Customer Connect, Customer Connect Inc, 36 Morrow Road, Barrie, ON, Suite 200 L4N 3V8.