

# Privacy Policy

RecStaff.com ("RecStaff", "we", "our", "us") is an online staff scheduling service. We provide organizations ("customers") with tools to schedule their staff. Employees of those organizations ("users") participate in the online scheduling activities by logging on to our website and/or receiving electronic communications sent from us on behalf of their employers. Our website and related applications (collectively, our "Website") are owned and operated by RecStaff Incorporated.

By accessing our Website and utilizing our services, you acknowledge that you have read and understood this Privacy Policy and the information collection and handling practices outlined in it.

This Privacy Policy was last updated on July 1, 2019. We may change this Privacy Policy from time to time; if we deem that the changes are significantly different from the previous version, a communication that summarizes the changes will be presented to each user on the first login following the change.

## Scope

This Privacy Policy describes in detail our policy and practices regarding our collection, use and disclosure of information about you. Although RecStaff serves customers across Canada and the United States, and our privacy policy incorporates best practices from many jurisdictions, the core principles we follow are those outlined in Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA). These are:

1. Accountability
2. Identifying purposes
3. Obtaining your consent
4. Limiting collection
5. Limiting use, disclosure and retention
6. Maintaining accuracy
7. Safeguarding your data
8. Openness
9. Individual access
10. Challenging compliance

## 1 Accountability

We understand that providing information online involves a great deal of trust on your part. We take this trust very seriously, and make it a high priority to ensure the security and confidentiality of the personal information you provide to us when you visit our Website or use our services.

This privacy policy describes our procedures for collecting and using your personal information. Whenever we implement a new feature or service, we use the following checklist to ensure that we are following fair information practices:

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- What personal information will we be collecting? Is any of the information sensitive?
- Why are we collecting it? Is it absolutely necessary?
- How will we collect it?
- What are we going to do with the information?
- Where are we going to store it?
- How are we going to secure it?
- Who has access to the information or uses it?
- Are we disclosing it to any third parties?
- Will the information be disposed of?

We regularly assess this checklist as we provide our services and correct any errors or deficiencies. If you have any questions regarding our policies please contact our Privacy Office at the coordinates listed at the bottom of this document.

## 2 Identifying Purposes

RecStaff uses the information we collect about you for the following **general purposes**:

- for registration and to manage your account
- allowing you secure access to, and use of, our site
- to communicate with you to provide information about the RecStaff application
- to enable your organization to push scheduling information to your account and devices
- to enable your managers to send information regarding relevant schedules and shifts
- to respond to your questions and comments;
- to troubleshoot problems;
- to prevent potentially prohibited or illegal activities;
- to enforce our Terms of Use
- as otherwise described to you at the point of collection.

## 3 Obtaining Your Consent

When you first register an account at RecStaff, you agree to our “**Terms of Service**”. These terms include consent to collection information needed to provide the service to you and to your employer who contracted with RecStaff to provide the service. Those Terms of Use include a link to this privacy policy so you can understand why we are collecting personal information and how we manage it. You are free to withdraw your consent for RecStaff to collect and use this information at any time by communicating your request to the privacy officer listed below (or by emailing [privacy@recstaff.com](mailto:privacy@recstaff.com))

## 4 Limiting Collection

We receive and store any information you enter on our Website or give us in any other way. This includes information that can be used to identify you as an individual or to contact you directly (“**personal information**”). We only collect information that is necessary to provide the services for which RecStaff has been contracted by your employer.

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Personal information includes information you provide us such as your first and last name, telephone number, postal and email addresses, user name and password, billing information (such as your credit card number, cardholder name, and card expiration date if you are the billing contact). We may also request information about your preferences with respect to modes and frequency of communication.

You can choose not to provide this personal information to us, but in general some information about you is required in order for you to receive communications from your employer that are sent through RecStaff. For example, you may decide not to enter your mobile telephone number into our web site. In that case, we will be unable to deliver text messages that describe your shifts on a schedule, opportunities to pick up new shifts and so on.

Other information we may choose to collect may also include details such as the type of device you use to access our services.

### *Mobile Telephone Number for Text (“SMS”) Messages*

RecStaff will enable your employer to communicate scheduling information to you via text message. If you decided not to provide a mobile phone number in your account profile, you will still be able to use the Website but you may miss urgent communications from your manager.

### *Email Address for Email Communications*

RecStaff relies on your e-mail address to securely complete the registration process. RecStaff allows employers to register employee accounts in three different ways but all three ways use an e-mail message with a secure link within it to complete the process. Once you have completed the registration process you are free to remove the e-mail address from your profile.

RecStaff will enable your employer to communicate scheduling information to you via email. If you decided to remove your email address following registration, you will still be able to use the Website but you may miss urgent communications from your manager.

### *Information from Your Employer*

We also may periodically obtain information about you from your employer. For example, your employer (our customer) may provide registration details about you, including contact information, job details, credentials you may hold and more. Any information provided to us by your employer will be used on our Website in accordance with the practices outlined in this Privacy Policy.

### *Automatic Collection of Information.*

We automatically collect some information from your computer or Device when you visit RecStaff. For example, we will collect session data, including your IP address, Web browser software, and referring website. We also may collect information about your RecStaff activity, such as pages visited and services used. One of our goals in collecting this automatic information is to monitor the responsiveness of our services and provide the best possible user experience.

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### *Payment Information.*

If you are a user that is responsible for paying for the services provided by RecStaff, you will provide your collection information, which may include your credit card number, cardholder name, expiration date, authentication code, and billing address, to a third party billing service. We may enable this collection of data through our Website, but the information **WILL NOT** be stored on our servers.

### *Location Information and Other Information from Devices.*

When you use an Application on a Device, we will collect and use information about you in generally similar ways and for similar purposes as when you use the RecStaff website. In addition, if your employer has contracted with us to provide GPS-based time clock services, we may ask to collect information about your location. You can change the privacy settings of your Device at any time, in order to turn off the functionality to share location information with our Application and/or the functionality to log your arrival at your place of work. Please note that turning off this location sharing may affect certain features of our App. If you have any queries about the privacy settings of your Device, we suggest you contact the manufacturer of your Device or your mobile service provider for help.

### *Cookies and Other Web Technologies.*

We collect information via cookies and other similar technologies. Cookies are small text files that are automatically placed on your computer or mobile device when you visit almost any website. They are stored by your Internet browser. Cookies contain basic information about your Internet use. Your browser sends these cookies back to the site every time you revisit it, so it can recognize your computer or mobile device and personalize and improve your site experience.

You can find out more detailed information about cookies generally, including how to see what cookies have been set on your device and how to manage and delete them at websites such as [www.allaboutcookies.org](http://www.allaboutcookies.org).

RecStaff, its websites, and Apps use cookies for the following general purposes:

- To help us recognize your browser as a previous visitor and save and remember any preferences that may have been set while your browser was visiting our site. For example, if you select the option to “Remember me” on our login page, will we store your username (but **NOT** your password) in a cookie on the device you are using to login.
- To maintain a current “session” with our Website; when you log in to our service, we create a session that holds relevant information relating to your current activities on the Website. For example, as you search for available shifts to pick up, we hold your search criteria in an ongoing session so we can apply those criteria on subsequent searches. When you log out of RecStaff, that information is discarded.
- To help measure the performance of features within the Website.

The Help portion of the toolbar on most browsers should tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to

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disable non-essential types of cookies. Please note that if you refuse to accept cookies, you may not be able to access many of the tools offered on our site.

### *Your rights and choices with respect to the collection and use of your information*

- You can choose not to provide us with your personal information, although as explained above it may be needed to take advantage of certain features offered on RecStaff.
- You have the right to ask us what personal information we hold about you by contacting us at the address below (see "Contact Us"), and we may charge a small fee for providing you with this information.
- If you decide to close your RecStaff account, you will need to contact your manager or supervisor and ask that they deactivate your account and remove your information from active view.
- When you register as a member of RecStaff.com the information you will be asked to provide is determined in part by your employer when they contract with RecStaff. For example, your employer may configure RecStaff to prompt you for a home address when you register.
- Please note that we may send you other communications, including service announcements, and administrative messages relating to your RecStaff account.

## 5 Limiting use, disclosure and retention

As we described in section 1 *Accountability* we will only use your personal information to deliver the services agreed upon with your employer and described in section 2 *Identify Purposes*. We will never sell, rent or otherwise make your data available to third parties for any purpose beyond those required to deliver our service which are described herein.

### *With whom we share your information*

RecStaff **may** share your information with the following entities:

- Third-party vendors who provide services or functions on our behalf, including billing services, text messaging services, and e-mail delivery services. Third-party vendors have access to information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.
- Your employer who has contracted us to provide staff scheduling services;

We also may share your information if we believe, in our sole discretion, that such disclosure is necessary...

- to comply with legitimate and enforceable subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.

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- to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of RecStaff, our customers, or others; and in connection with our [Terms of Service](#) and other agreements.

If you choose to create an account on RecStaff, no information in your profile will be publicly viewable or identifiable by any users outside of your employer and RecStaff employees who are working on their behalf.

We also may share aggregate or anonymous information with third parties, including potential customers of RecStaff and investors. For example, we may tell prospective customer the number of visitors our Website receives or the most popular features within the application. This information does not contain any personal information and is used to develop services we hope you will find useful.

### *How Long We Keep Your Information for*

We take reasonable steps to ensure that your information is relevant to its intended use, accurate, and complete. If you have submitted personal information to RecStaff and would like to have access to it, or if you would like to have it corrected, please contact us using the contact information provided below. We will use reasonable efforts to comply with your request; however, in some cases we may not be able to allow you to access certain information that has been deemed confidential by your employer or manager. We may retain certain information associated with your account in our archives, including for analytical purposes, as well as for recordkeeping integrity. The periods for which we retain your information depend on the purpose for which we collected it and how we use it.

### *Data Storage*

If you are registered as a Canadian customer, please be aware that your information will only be transferred to, stored, and processed in Canada; our Canadian servers and data storage are operated in data centres in Toronto and Vancouver. Furthermore, personal information collected in Canada is only shared with third-party vendors located within Canada. RecStaff makes every reasonable effort to comply with federal and provincial legislations and regulations to ensure that your privacy is protected.

If you are registered as an American customer, please be aware that your information will only be transferred to, stored, and processed in the United States; our US servers and data storage are operated in Oregon and North Virginia. Furthermore, personal information collected in the US is only shared with third-party vendors located within the US. RecStaff makes every reasonable effort to comply with federal and state legislations and regulations to ensure that your privacy is protected.

By using our services, you acknowledge that your information may be transferred to our facilities and those third parties with whom we share it according to the restrictions outlined in this section.

### *External links*

Our Website may include links to third party websites. If you access other websites from the links provided on our Website, the operators of those websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from our Privacy Policy. We

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recommend that you examine the privacy statements posted on those other websites to understand their procedures for collecting, using, and disclosing personal information.

### 6 Maintaining Accuracy

We endeavor to ensure that your personal information is relevant to its intended use, accurate, and complete. You can also review, add or update the information you have provided to us by visiting the “My Profile” page on our Website. If there is any other data which you believe is in error, please contact us as described below and we will attempt to correct the matter promptly.

### 7 How we protect your information

We want you to feel confident about using RecStaff, and we are committed to protecting the information we collect. While no website can guarantee security, we have implemented and maintain appropriate physical, administrative, technical, and organizational measures to protect the personal information you provide us against unauthorized or unlawful access, use of disclosure, and against accidental loss, damage, alteration or destruction.

For example, only authorized employees are permitted to access personal information, and they only may do so for permitted business functions. In addition, we use encryption when transmitting your personal information between your system and ours, and between our system and those of the parties with whom we share information to deliver our services, and we employ firewalls and intrusion detection systems to help prevent unauthorized persons from gaining access to your information.

### 8 Openness

We make every reasonable effort to ensure that our users understand our privacy policies. If any policy is unclear we encourage our users to ask questions of our privacy office at the coordinates below.

#### *Changes to this Privacy Policy*

RecStaff may change or modify this Privacy Policy in the future. We will note the date that revisions were last made to this Privacy Policy at the bottom of this page, and any revisions will take effect upon posting. We will notify our user of material changes to this Privacy Policy by either sending a notice to the email address you provided to us or by placing a notice on our Website. We encourage you to check this Privacy Policy from time to time to review the most current version.

Also, if RecStaff devises a new feature or service that uses data you have provided, and a reasonable assessment of this new service or feature would conclude it is a new use for the data, then we will obtain consent from you before we use your data in the new service.

#### *Privacy Breaches*

We follow industry best practices to protect your information. In the unlikely event of a privacy breach, RecStaff will notify all users whose data may have been compromised, and the subscribing organization will be also be notified of the breach.

## 9 Individual Access

As noted above in section 4 *Limiting Collection* you have the right to ask us what personal information we hold about you by contacting us at the address below (see "Contact Us"), and we will provide that information to you (a small fee may be charged for providing you with this information).

The only limitation to individual access is where information was provided to us by your employer, and is deemed confidential, or where information has been collected in the operation of the service and is deemed by your employer to be confidential.

## 10 Challenging Compliance

If you have questions about this Privacy Policy, or concerns about how RecStaff is collecting or using your data, please contact us at:

RecStaff Incorporated  
8541 Bexley Terrace, North Saanich, BC, V8L 1M3  
Attn: Privacy Officer  
Email: [privacy@recstaff.com](mailto:privacy@recstaff.com)

### *Call Recording and Monitoring.*

Please be aware that calls to and from RecStaff may be recorded. We may use the call recordings to monitor our customer service for quality or compliance purposes, to check the accuracy of the information you provide us, for fraud prevention purposes, or to provide training to our staff. We will retain the call recordings for as long as reasonably necessary to perform such activities and then delete them. Any personal information obtained from you during the call will be treated in accordance with the provisions of this Privacy Policy.

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Effective July 1, 2019