

Privacy policy

Last updated June 2020

Queclink Wireless Solutions Co. Ltd. and its Affiliates (**Queclink**).

In this Privacy Policy, the expressions “**Queclink**”, “we”, “us” and “our” are a reference to Queclink Wireless Solutions Co. Ltd. and its affiliates (as defined in the *Canada Business Corporations Act* (R.S.C., 1985, c. C-44)).

This Privacy Policy applies to personal information collected by us. We are bound by the *Personal Information Protection and Electronic Documents Act* (S.C. 2000, c. 5) and the privacy legislation of certain Canadian provinces (collectively, the “**Privacy Legislation**”), which govern the way private sector organisations collect, use, keep secure and disclose personal information.

The purpose of this Privacy Policy is to generally inform people of:

- how and when we collect personal information;
- how we use and disclose personal information;
- how we keep personal information secure, accurate and up-to-date;
- how an individual can access and correct their personal information; and
- how we will facilitate or resolve a privacy complaint.

If you have any concerns or complaints about the manner in which your personal information has been collected, used or disclosed by us, we have put in place an effective mechanism and procedure for you to contact us so that we can attempt to resolve the issue or complaint. Please see **Section 12** for further details.

If you have any concerns or questions, please contact us and our privacy officer at lisa@worldwideplanet.com and our privacy officer will then attempt to resolve the issue.

We recommend that you keep this information for future reference.

1. What is personal information?

The Privacy Legislation defines “personal information” to mean any information about an identifiable individual.

2. The kinds of personal information collected, used and disclosed by Queclink

We will only use or disclose your personal information for the primary purposes for which it was collected. Notwithstanding the foregoing or anything else in this Privacy Policy, we reserve the right to collect, use and disclose your personal information as may otherwise be permitted or required by Privacy Legislation.

Usually, at or around the time we collect personal information from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information.

We set out some common collection, use and disclosure instances in the table below. The table below serves as notice to you of how we will use and disclose your personal information in the circumstances set out in the table. As such, we may not provide additional notice at the time we collect your personal information in those circumstances described in the table.

Purpose	Type of Information	Uses	Disclosures
General enquiries	<ul style="list-style-type: none"> • Contact information: Such as your name, Company name, address, billing address (if different to address), email address, phone numbers, username and password. • Transaction Sales: Where relevant to your enquiry, such as: <ul style="list-style-type: none"> - Delivery information. - Billing and account details. - Payment card details. • Customer Service: Information collected in connection by our customer services department. 	<p>The types of uses we will make of personal information collected for this type of purpose include:</p> <ul style="list-style-type: none"> • Identity verification: if required, the verification of your identity. • Customer service functions: the provision of our services to you relating to your enquiry, including: <ul style="list-style-type: none"> - Using your personal information in order for you to receive and use the products and services offered. - Payment processing, including charging, credit card authorisation, verification and debt collection. - To provide customer service functions, including handling customer enquiries and complaints. • Marketing: using your personal information for the purposes set out in “<i>Marketing Services</i>” section below. • General administrative and security use: <ul style="list-style-type: none"> - To protect Queclink’s websites from security threats, fraud or other criminal activities. - The use for the administration and management of Queclink. - The maintenance and development of our products and services, business systems and infrastructure. - In connection with the sale of any part of Queclink’s business or a company owned by a Queclink entity. - To provide customer services to clients and for quality assurance purposes. 	<p>The types of disclosures we will make of personal information collected for the type of purposes are listed below and depend on the nature of your enquiry:</p> <ul style="list-style-type: none"> • Where your enquiry relates to a transaction via our website with a third party, that third party. • Third parties connected with the sales process including ecommerce, payment gateway providers and financial institutions. • Service providers (including IT service providers and consultants) who assist Queclink in providing our products and services. • Related bodies corporate of Queclink (including related entities) and Queclink’s business associates. • Third parties in connection with the sale of any part of Queclink’s business or a company owned by a Queclink entity. • As required or authorised by law.
Sales	<ul style="list-style-type: none"> • Contact and identifying information required to identify you, whether via your account on our website or for transactions conducted offline, such as your name, Company name, address, billing address (if different to address), email address, phone numbers. • Trade account creation where you wish to create a trade account with us, either directly or via our website, we may collect information from you relating to your credit worthiness, and may seek this information from a third party credit check provider. • Billing information required to process transactions with us, such as your bank account details (including bank statements) and credit or debit card details. 	<p>For full details relating to uses of personal information in relation to the use of credit information, please refer to Section 7 below.</p> <ul style="list-style-type: none"> • Vendor and supplier payments: The processing of any payments and refunds, if applicable. • Purchases of Queclink’s products and third party products via our website: Payment processing, including charging, refunds (if applicable), credit card authorisation, verification and debt collection. • Online accounts: If you create an account with Queclink and you provide us your personal information, we will use it for: <ul style="list-style-type: none"> - Processing of account transactions. - Customer service related contact. 	<p>For full details relating to disclosures of personal information in relation to any credit information, please refer to our Section 7 below.</p> <p>In summary, we may disclose this type of personal information to:</p> <ul style="list-style-type: none"> • Our contractors, agents and third party providers who undertake billing and credit services on our behalf. • Third party providers who assist us in providing our products and services to you. • Third parties, such as external debt recovery agents, court or other entities to which we are required by law to disclose

Purpose	Type of Information	Uses	Disclosures
Marketing activities	<ul style="list-style-type: none"> • Contact information: Such as your name, email address, current postal and residential addresses, phone numbers, country of residence (and, if applicable, age). • Website enquiries: Such as your name, email address, phone number and any information you provide to us as part of your message. • Social media activity: Including “likes”, comments posted, any of your oppositions or feedback, photos posted or uploaded and other information pertaining to your social media activities which concern, or relate, to Queclink. 	<ul style="list-style-type: none"> • General administrative and security use as detailed in the Uses column for “<i>Sales and enquiries</i>”. • General marketing and consumer analytics: using your personal information: <ul style="list-style-type: none"> - To aggregate with other information and to then use it for marketing and consumer analytics. - To offer you updates on products, events or information that may be of interest to you. - For Marketing and promotional activities by us (including by direct mail, telemarketing and email) such as our email alerts, product awareness information and newsletters. - For the Uses detailed above in “<i>Sales</i>”. • Online accounts or social media: If you create an account with Queclink or participate in our social media platforms (such as Facebook, Twitter and LinkedIn) and you provide us your personal information, we will use it for: <ul style="list-style-type: none"> - Adding account holders to the marketing database. - Customer service related contact. - Responding to social media messages. - Fulfilling social media platform rules. 	<p>personal information.</p> <ul style="list-style-type: none"> • The parties listed in the Disclosure column for “<i>General enquiries</i>”. <p>We may disclose your personal information to:</p> <ul style="list-style-type: none"> • Third parties connected with the marketing process who assist us in providing our products and services to you. • The parties listed in the Disclosure column for “<i>Sales</i>”.
Human resources	<ul style="list-style-type: none"> • Contact information: Such name, e-mail address, current postal and residential address, phone numbers, country of residence, next of kin contact details. • Employee record information • Identifying information: Such as your photo, passport and residency details, date of birth. • CV, resume or application related information: Such as the details provided in your resume or CV, your eligibility to work in Canada and elsewhere, your education, previous employment details, professional memberships or trade qualifications. • Tax, benefits and payroll information: Such as your SIN number, payroll deduction information, benefits details and financial institution details. • Background check information: Information obtained from 	<ul style="list-style-type: none"> • Background checks: Utilising the information collected for the purpose of assessing candidate suitability for role, including by obtaining, as permitted by law: <ul style="list-style-type: none"> - Verification of your identity and age. - Criminal history background checks including publically available information including Facebook, Twitter, Instagram, YouTube. - Confirmation of eligibility to work in Canada and elsewhere. - Confirmation of education and qualifications. - Confirmation of previous employment. - Consideration regarding medical leave. • Administration and performance monitoring use: Utilising the information collected for the purpose of: <ul style="list-style-type: none"> - Dealings related to the employer/employee 	<p>We may disclose your personal information to:</p> <ul style="list-style-type: none"> • Relevant benefits company. • Government agencies, including but not limited to Revenue Canada. • Relevant Worker’s Compensation organisation (e.g. Workplace Safety and Insurance Board etc). • Third party references provided by you in connection with an application made to Queclink. • Service providers (including IT service providers and payroll providers), if any. • Recruitment agents used in connection with your application with us.

Purpose	Type of Information	Uses	Disclosures
	<p>you or third parties to perform background checks.</p> <ul style="list-style-type: none"> • Medical or health information which you voluntarily provide to us as part of pre-employment medicals, random drug and alcohol testing or such other information which may be related to an incident which has occurred during the course of your employment. • Performance related information: Pre-employment testing and other information collected by Queclink's systems in the course of the employee or contractor's engagement with Queclink. • Information collected from references • Security information: Such as CCTV footage and photographs taken on our premises. 	<p>relationship or the contractor/principal relationship (as the case may be).</p> <ul style="list-style-type: none"> - Use of such information whether or not the employment or contractor relationship is prospective, current or past. - Use of such information to monitor systems, performance and time usage and internet usage. - The use of your personal information collected in the administration and management of Queclink. - In connection with the sale of any part of Queclink's business or a company owned by a Queclink entity. 	<ul style="list-style-type: none"> • Third parties in connection with the sale of any part of Queclink's business or a company owned by a Queclink's entity. • Third party parties in connection with obtaining any background checks, pre-employment screening. • Financial institutions for payroll purposes. • As required or authorised by law.

3. How Queclink collects and holds personal information

3.1 Collection generally

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your personal information directly from you.

When you engage in certain activities, such as filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our products or services to you, we may be unable to provide our products or services to you in an effective manner, or at all.

3.2 Other collection types

We may also collect personal information about you from other sources, such as competitions and also from third parties. Some examples of these alternative collection events are:

- (a) when we collect personal information about you from third parties; or
- (b) when we are permitted to collect personal information about you from publicly available sources such as a telephone directory.

3.3 Notification of collection

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including as described in this clause 3.3(a) to 3.3(c) below. Generally speaking, we will not tell you when we collect personal information about you in the following circumstances:

- (a) where information is collected from any personal reference you have listed on any application form (including any employment application) with Queclink;
- (b) where information is collected from publicly available sources including but not limited to a telephone directory; or
- (c) as otherwise required or authorised by law.

3.4 Unsolicited personal information

In the event we collect personal information from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by Queclink (in its reasonable discretion) that the personal information is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited personal information collected is in relation to potential future employment with Queclink, such as your CV, resume or candidacy related information, and it is determined by Queclink (in its reasonable discretion) that it may consider you for potential future employment, Queclink may keep the personal information on its human resource records unless you request otherwise.

3.5 **How we hold your personal information**

Once we collect your personal information, we will put in place security safeguards that are appropriate to the sensitivity of the information, and if we engage a third party to hold your information for us, we will require that third party put in place security safeguards that are appropriate to the sensitivity of the information. We provide some more general information on our security measures in **Section 10 (Data security and quality)**.

3.6 **Cookies and IP addresses**

If you use our website, we may utilise "cookies" which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but may identify your internet service provider or computer.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies may enable us to aggregate certain information with other personal information we collect and hold about you. Quealink extends the same privacy protection to your personal information, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance or you can set your browser to automatically reject cookies. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved web site experience that cookies offer.

4. Uses and discloses of personal information

4.1 **Use and disclose details**

We provide a detailed list at **Section 2** of some common uses and disclosures we make regarding the personal information we collect.

4.2 **Other uses and disclosures**

We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
- (b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- (d) if it is required or authorised by law.

4.3 **Use and disclosure procedures**

In the event we propose to use or disclose such personal information other than for reasons set out in the above table at **Section 2** or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use unless the same is not required by Privacy Legislation.

Your personal information may be disclosed to organisations that provide services to us in relation to our operations or the products or services we provide to you and, in that case, we will require that those organisations only use and disclose your personal information for the purposes of providing those services.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your personal information.

4.4 **Communications opt-out**

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out at the top of this document and we will ensure the relevant communication ceases. Any other use or disclosure we make of your personal information will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

5. **Sensitive information**

5.1 **Sensitive information generally**

Sensitive information is a subset of personal information. It includes information about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

5.2 **Collection and use of sensitive information**

In general, we do not collect sensitive information from you, and we do not collect sensitive information from you without your consent.

The type of sensitive information we may collect about you is dependent on the services provided to you by Queclink and will be limited to the purpose(s) for which it is collected. We set out some types of sensitive information we may collect about you in the "*Human resources*" section of the table at **Section 2** above.

We do not use sensitive information to send you Direct Marketing Communications (as set out in **Section 6** below) without your express consent.

5.3 **Consent**

We may collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

6. Direct Marketing

6.1 Express informed consent

We will assume that you have given your express and informed consent to us using your personal information set out in the:

- (a) “*General enquiries*”;
- (b) “*Sales*”; and
- (c) “*Marketing Services*”

sections of the table at **Section 2** of this document above to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

6.2 Inferred consent and reasonable expectations of direct marketing

Without limitation to paragraph 6.1, if you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

6.3 Opt-out

If at any time you do not wish to receive any further Direct Marketing Communications from us or others under this Section 6, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out at the top of this document.

7. Credit Information and Credit Reporting

7.1 Credit information generally

Privacy Legislation applies to the use and disclosure of credit information, including in relation to the provision of both consumer credit and commercial credit.

7.2 Credit information and Queclink

As we provide terms of payment of accounts, we are effectively a credit provider in relation to any credit we may provide you (in relation to the payment of your account with us).

We use credit related information for the purposes set out in the “Credit information” section of the table at **Section 2** above.

We may also provide credit, financial and other related information to credit reporting agencies, who may share that information with other entities. The privacy policies of TransUnion can be found at www.transunion.ca and for Equifax at www.equifax.com.

8. Anonymity and pseudo-anonymity

To the extent practicable and reasonable, we will endeavour to provide you with the option of dealing with Queclink on an anonymous basis or through the use of a pseudonym. However, there may be circumstances in which it is no longer practicable for Queclink to correspond with you in this manner and your personal information may be required in order to provide you with our products and services or to resolve any issue you may have.

9. Cross Border Disclosure

9.1 Cross border disclosures

Any personal information collected and held by Queclink may be disclosed to, and held at, a destination outside Canada, including but not limited to Australia, where we are located, and China where we utilise third party service providers and have agreements with business associates who assist Queclink with providing its goods and services. Personal information may also be processed by staff or by other third parties operating outside Canada who work for us or for one of our suppliers, agents, partners or related companies.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

In addition we may utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we may own or control such overseas infrastructure or we may have entered into contractual arrangements with third party service providers to assist Queclink with providing our products and services to you.

9.2 Provision of informed consent

By submitting your personal information to Queclink, you expressly agree and consent to the disclosure, transfer, storage or processing of your personal information outside of Canada. In providing this consent, you understand and acknowledge that countries outside Canada do not always have the same privacy protection obligations as Canada in relation to personal information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

Privacy Legislation requires that we implement appropriate means for the protection of personal information that has been provided to third parties who are processing your personal information on our behalf.

10. Data security and quality

10.1 Queclink's security generally

We have taken steps to help secure and protect your personal information from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information, especially where human error is involved or malicious activity by a third party.

Notwithstanding the above, we will take reasonable steps to:

- (a) make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- (b) protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- (c) destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.

10.2 Accuracy

The accuracy of personal information depends largely on the information you provide to us, so we recommend that you:

- (a) let us know if there are any errors in your personal information; and
- (b) keep us up-to-date with changes to your personal information (such as your name or address).

We provide information about how you can access and correct your information in **Section 11**.

11. Access to and correction of your personal information

You are entitled to have access to any personal information relating to you which we hold, except in some exceptional circumstances provided by law (including Privacy Legislation). You are also entitled to request the correction of such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of personal information we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out at the top of this document.

12. Resolving Privacy Complaints

12.1 Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

12.2 Contacting Quealink regarding complaints

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, please contact us:

Telephone: (587) 425 6333

Email: lisa@worldwideplanet.com

Address: 3801-9th Ave North Lethbridge Alberta, Canada, T1H 6G8

Please mark your correspondence to the attention of the Privacy Officer.

12.3 **Steps we take to resolve a complaint**

In order to resolve a complaint, we:

- (a) will require proof of your identity so that we can confirm that you are the person who you claim to be;
- (b) will liaise with you to identify and define the nature and cause of the complaint;
- (c) may request that you provide the details of the complaint in writing;
- (d) will keep you informed of the likely time within which we will respond to your complaint; and
- (e) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

12.4 **Record of complaints**

We will keep a written record of the complaint and any action taken in resolving the complaint.

13. Consent, modifications and updates

13.1 **Interaction of this Policy with contracts**

This Privacy Policy is a statement of our privacy practises required by law rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, Queclink may incorporate the terms of this policy such that:

- (a) certain sections or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations onto Queclink, but do create contractual obligations on the other party to the contract; and
- (b) the consents provided in this policy become contractual terms provided by the other party to the contract.

13.2 **Acknowledgement**

By using our website, purchasing a product or service from Queclink or otherwise interacting with us, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

- (a) to provide the consents given by you in this Privacy Policy unless you inform us otherwise; and
- (b) that you have been informed of all of the matters in this Privacy Policy.

13.3 **Modifications and updates**

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct

communication or by posting a notice on our website). If you do not agree to our continued use of your personal information due to the changes in our Privacy Policy, please cease providing us with your personal information and contact us via the details set out at the top of this document.