

Barrington OPS Website Privacy Policy

Last Updated: November 30, 2020

Barrington OPS is a division of The Barrington Consulting Group Ltd., a corporation under the laws of Canada (“We”). We value and respect your privacy and are committed to respecting the privacy of users of our Site. This privacy policy (the “Policy”) identifies the way we collect, use, and disclose personal information through our website www.barringtonops.ca (the “Site”) and your rights in connection with that information.

By using the Site, you agree to the collection and use of information in accordance with this Policy.

This Policy applies to anyone accessing our Site (collectively, “You”), as casual visitors. This Policy is incorporated into our Terms of Use, as applicable. If We make any changes to our Policy, We will post the revised policy to the Site and update the “Last Updated” date of the Policy.

Defining Personal Information

Personal information is any information recorded in any form that identifies or can identify an individual in combination with other information. Thus, personal information includes your name, gender, address, phone number, date of birth, credit card details or other financial information, and health information. Below, We outline the type of Personal Information We collect and its uses.

Consent to Use Personal Information

Consent may be implied based upon the reasonable expectations of the individual. For example, if you provide your email by submitting a request for Us to communicate with you, consent will be implied for the purpose of using the information to send information to your inbox. In determining the appropriate form of consent, We will consider the sensitivity of the Personal Information. Express consent will always be sought should the primary purpose of collection be to disclose your personal information to a third-party.

Collecting and Using Your Personal Information

As described above, We collect Personal Information from or about you in connection with your use of, or your submissions to, the Site. While using the Site, We collect information in the form of cookies. Any

information you choose to share with us is subject to the Fair-Trade Principles found in Schedule 1 of the *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

Types of Data Collected

Types of information that will be collected:

- Identifiers: First name, last name, email address, and phone number, if you choose to contact us through our Contact Us page or opt-in to our email listserv.
- Employment related information: If you choose to apply for employment via email or through a third-party website.
- Cookies: Identifiers that are transferred through our web browser. We may collect data that is sent from your browser. This could include your IP address or the type of browser you used.

We may collect personal data that you voluntarily provide to us when:

- You request additional information about our Services;
- You submit questions to us via email; and,
- You choose to submit your resume via email in relation to career opportunities posted on our Site.

The personal data provided by you may be used to communicate with you in connection with your various inquiries and subscriptions or to consider you for employment purposes, and will be kept for the time period in which it is necessary for the purpose it was collected.

Use of Cookies

Cookies

These may be used to administer the Site and provide analytic feedback. Our Site uses functionality and performance cookies, which are necessary for our Site to function optimally. You have the option to disable cookies by updating those changes in your web browser settings. This varies for each web browser. Please note that doing so could impact our Site's performance when you access it.

Limiting Collection

We limit the collection of Personal Information to that which is required for the identified purposes listed above. We are responsible for ensuring that all information collected is limited, both in amount and type, to what is needed to fulfill the identified purposes.

We will collect personal information directly from the individual who the information is about, but may also collect personal information from other sources, with the consent of the individual or where permitted or required by law, including but not limited to your Organization.

Disclosure of Personal Information

Your personal information may be shared outside of the country where you are located, with relevant Barrington offices in charge of dealing with your inquiries or applications. The list of Barrington offices and country is available on our Barrington Contact page <https://www.barringtongrp.ca/contact/>

Barrington has internal privacy policies and processes that ensure protection of your personal information across Barrington offices, regardless of where the personal information originates or is processed.

Please note, we may disclose data about you when we are permitted by law.

Security Measures to Protect Your Personal Information

We maintain reasonable physical, technical and administrative safeguards to help protect against the unauthorized access, use and disclosure of personal data that you voluntarily provide to us.

It should be noted that we cannot be held responsible for any personal data that you share or post on public spaces, such as our Twitter account or LinkedIn page. Such public spaces can be viewed by anyone visiting our Site and, as such, falls outside the scope of this Policy.

Access, Review and Correction

You have the right to access your personal data. For legitimate purposes, you can rectify or oppose to the processing of your personal data on our Site. You also are entitled to ask to receive your personal data in a structured and standard format. In case of any such request or complaint, please send an email to OPS@barringtongrp.ca or write to the Barrington OPS Associate Partner at:

The Barrington Consulting Group, OPS
Attention: Robert Newcombe, Associate Partner
1326 Barrington Street
Halifax, Nova Scotia
B3J 1Z1

To the extent permitted by applicable law, where Barrington would not address properly your request, you have the right to lodge a complaint with your local Office of the Privacy Commissioner.

Links to Non-Barrington Websites and Third-Party Applications

This Site may contain links to third-party websites and third-party applications that are not affiliated with Barrington or operated by Us (such as LinkedIn feed updates and more). Barrington does not endorse or represent these third-party websites and applications. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise that you review the Privacy Policy of every site you visit.

This also applies to each of our ecosystem partnerships. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Contact Us

If there are questions or concerns about Our compliance with the privacy actions listed in this Policy, you can reach out to us directly.

As per the Accountability principle found in Schedule 1 of PIPEDA, you can contact us by email by reaching out to Robert Newcome, Associate Partner, who is accountable for the Site and the Service's compliance with this Privacy Policy.

He can be reached at:

Robert Newcombe, Associate Partner
The Barrington Consulting Group
rnewcombe@barringtongrp.ca

This privacy policy is subject to change at any time. Please refer to the "Last Updated" date at the top of this policy.

Further information on the privacy principles and your rights in regard to your Personal Information may be found on the website of the Privacy Commissioner of Canada: <https://www.priv.gc.ca/>.