



DIREXYON Technologies

Privacy Policy

November 17, 2022

Table of Contents

Table of Contents	2
Privacy Policy	3
DIREXYON Technologies Privacy Policy	3
1.0 Introduction	3
2.0 Personal information we collect	3
3.0 How we use personal information	4
4.0 How we share personal information	5
5.0 Technical Security of your Personal Information	6
6.0 Your rights	7
7.0 Transfer and Storage of Personal Information Abroad	8
8.0 How long we keep your Personal Information	8
9.0 Communication preferences	8
10.0 Minors	9
11.0 Individuals based in European Union (EU), European Economic Area (EEA) and Switzerland or in California	9
12.0 Changes to the Policy	9
13.0 Privacy Officer Contact Information	9
Appendix A	9
A.1 For individuals based in European Union (EU), European Economic Area (EEA) and Switzerland.	9
A.2 For individuals based in California	10

Privacy Policy

The generic use and disclosure of personal information that is collected from the individuals online, through the corporate websites and hosted applications.

DIREXYON Technologies Privacy Policy

1.0 Introduction

DIREXYON Technologies inc. (“**DIREXYON**” or (“**we**”, “**our**” or “**us**”) is a Montreal-based technology company that develops specialized software for decision support, financial modeling, and risk management. Since its inception, DIREXYON has focused on assisting organizations quantify and understand the impact of their decision-making policies. In doing so, DIREXYON s has developed industry-leading decision making, predictive analytics and simulation software solutions by leveraging its unique multidisciplinary team comprised of finance, software engineering, mathematics, data analytics and artificial intelligence professionals, notably the DIREXYON Suite Solution and the MODEX Solution (collectively, the “**Services**”). DIREXYON also provides a website at the following address: <https://www.direxyon.com/>(the “**Website**”) and various social media platforms (collectively, the “**Site**”). For more information about our Services, please refer to our Website:

By using the Site and the Services, as a Client or End User, or by providing us with Personal Information (as defined below) through our Site or the Services or by telephone, email, in person or by any other means, we may have access and may collect certain information relating to you which may allow, directly or indirectly, your identification (“**Personal Information**”). This privacy policy (the “**Policy**”) sets out what Personal Information we may collect from you, the purposes for which we collect it, how we use it and when we may disclose it to third parties. This Privacy Policy also describes the choices you can make about how we collect, use and disclose your Personal Information.

By providing us with Personal Information, through our Site or Services, by telephone, email, in person or by any other means, YOU AGREE THAT YOUR PERSONAL INFORMATION WILL BE COLLECTED, USED AND DISCLOSED AS PROVIDED FOR IN THIS POLICY.

Your rights are important to us and we want you to know that.

2.0 Personal information we collect

2.1 Personal Information you choose to provide to us

WHEN

We may ask you to provide Personal Information when:

- You use the Website to download articles, data sheets or eBooks
- You use the Services and provide account information
- You contract the Services with us
- You request a free trial or demo of the Services
- You refer a Client to us
- You connect with us directly via phone calls or video conferencing platforms
- We or Client account administrators grant you access to the Application
- You or Client account administrators upload or enter personal information into the Application
- You participate in a marketing/sales promotion
- You attend trade events and other industry networking events
- You register or attend a webinar or other event
- You participate in programs we may offer from time to time
- You participate in chats
- You pay for our Services
- You address customer support questions, issues and general feedback that you choose to provide
- You express an interest in obtaining additional information about our Services
- You use our “Contact Us” or similar feature on our Website

- You visit our offices (you may be required to register as a visitor and to provide Personal Information upon arrival).

If you provide us or any Service Provider with any Personal Information relating to another a third party's, you represent that you have obtained the necessary consent to the collection of Personal Information relating to such third party by us, and that such third party is aware that the Personal Information may be used in accordance with this Policy.

WHAT

The Personal Information we collect may include first and last name, business email address, phone number, company name.

As an End User of the Application, we collect your name and business email address.

In addition, we may collect data uploaded by you, the Client or other users of the Services that may be required to use the DIREXYON Services. We expect all users to follow their organization's privacy policy and any applicable regulatory requirements when uploading, accessing and using personal information into our Services. The data uploaded may include Personal Information like:

- employee names and email address;
- vendor names, email addresses, contractual agreements or other personal data necessary for the DIREXYON Services;
- customer names and email addresses necessary for the use of the DIREXYON Services.

As a Job Applicant, we may also collect Personal Information contained in your resume and cover letter.

2.2 Information we collect automatically

WHEN

We collect information about your visits to the Site and the Services when you land on any of our web pages through cookies and similar tracking technology.

For further information about the types of Cookies we use, you can access our Cookie policy at <https://www.direxyon.com/cookie-policy/>.

WHAT

The information collected includes:

- access times
- the pages you view
- the links you click on
- the search terms you enter
- actions you take in connection with any of the visited pages
- your device information such as IP address, location, browser type and language
- the Uniform Resource Locator (URL) of the website that referred you to our website and
- the URL you browse away from our pages if you click on an external link

We may also collect information when you open email messages from us or click on links within those email messages.

3.0 How we use personal information

We use your Personal Information to:

- Provide the Services to you and allow full use of the Service functionalities as purchased by you
- Manage your account and communicate with you
- Deliver training and support to you and/or carry out the transactions they have requested
- Communicate with you directly through emails, calls, chats, video conferencing
- Send communications to you about:

- new Service features and upgrades
- our services and offerings
- event announcements
- product notices and changes to our terms and policies
- particular programs in which you have chosen to participate
- promotional offers and surveys
- scheduling demos and managing free trials
- Advertise and market our products and Services, including delivering interest-based advertisements on the Site or content syndication platforms and websites.
- Carry out market research to understand how to improve our Services and their delivery
- Create and manage marketing campaigns
- Generate sales leads and increase our market share
- Analyze user clicks and usage of the Services and Site to improve user experience and maximize usage of our Services
- Manage our Site and Services in order to maintain and deliver the contracted functionality and services,
- Enforce our Site and Services terms and/or separate contracts (if applicable) with you
- Prevent fraud and other prohibited or illegal activities
- Protect the security or integrity of the Site, our business or Services; or
- Otherwise, as disclosed to you at the point of collection or as required or permitted by law.

Please note that sometimes we may record the video conferencing call in which you participate in order to analyze and improve our staff's communication skills. If we do so, we will be announcing it at the beginning of the conference call as well as in the meeting invite and we will be providing a link to our Policy in the meeting invites and on the registration page.

We do not sell your information to any third party.

DIREXYON will not use your Personal Information for purposes other than those indicated herein.

4.0 How we share personal information

We keep your Personal Information secured, encrypted and confidential and we do not disclose it, except in the following instances:

Our affiliated entities

We may share your Personal Information with our affiliated entities to better serve you. Our affiliate entities are subject to this Policy and adhere to it in strict compliance.

Our Services

If you are an End User of our Services, your Personal Information may be viewed by other users with access to the Services within your corporate instance.

Aggregated Statistics and Reports

We freely use and disclose data in anonymous form, for example, for statistical, analysis, calibration, quality management and improvement purposes in relation to the Services, or for the development or delivery of other products and services by DIREXYON. These aggregated data will never enable to identify you.

Service Providers

We use third parties to help us provide our Services through the use of their Cloud Services (the **'Service Providers'**). They will **NEVER** have access to your Personal Information as collected by the Site or the Services. Please note that we sign contractual agreements to obligate them to protect the environment hosting our Services and protect the confidentiality of your Personal Information.

Authorized Personnel

Our employees or independent contractors (“**Authorized Personnel**”) may have access to your Personal Information for the purpose of helping us provide the Services. Authorized Personnel access and use such Personal Information in accordance with our instructions, on a “need to know” basis, and under defined strict confidentiality and security obligations.

Legal disclosures

It is possible that we may need to disclose Personal Information to our attorneys, to any person authorized under application legislation, when required by law, subpoena, or other legal processes as identified in the applicable legislation or if we believe that such disclosure is necessary to investigate, prevent or respond to illegal activities, fraud, physical threats to you or others or as otherwise required by any applicable law or regulation and to the extent necessary to protect property, interests and rights of DIREXYON.

We will attempt to notify you about legal demands for your Personal Information when appropriate in our judgment unless prohibited by law or court order or when the request is an emergency.

Change in Control

We can also share your Personal Information as part of a sale, merger or change in control or in preparation for any of these events. An agreement will first be entered into between the parties that stipulates among other things that the other party undertakes to use the information only for concluding the commercial transaction and provide strict confidentiality clauses.

Any other entity which buys us or part of our business will have the right to continue to use your Personal Information, but only in the manner set out in this Policy unless you agree otherwise.

Express Consent

DIREXYON may also disclose your Personal Information at your express request.

5.0 Technical Security of your Personal Information

We are committed to protecting the security of all of the Personal Information we collect and use.

We use a variety of physical, administrative and technical safeguards designed to help protect it from loss, unauthorized access, use, modification and disclosure. We have implemented best-practice standards and controls in compliance with internationally recognized security frameworks. We use encryption technologies to protect data at rest and in transit.

The Personal Information we hold is only accessible to those who have the authority to access it and who consult it only when necessary in the performance of their duties.

To this end, we restrict access to our offices and computer equipment, train our staff and require our agents and Service Providers who have access to Personal Information to sign confidentiality agreements and implement security measures deemed equivalent.

Please note, however, that no method of transmission over the Internet, nor any means of electronic storage, is completely secure. Therefore, we cannot guarantee the security of any Personal Information transmitted to us or provided by you, which is done at your own risk.

We also cannot guarantee that such Personal Information will not be obtained, accessed, disclosed, altered or destroyed as a result of a breach of our safeguards and security.

If we believe your Personal Information has been compromised and the incident having compromised your Personal Information presents a risk of serious injury, we will promptly notify you (unless doing so would hamper an investigation conducted by a person or body responsible by law for the prevention, detection or repression of crime or statutory offences) and the Commission d'accès à l'information.

If you believe that your Personal Information has been compromised, we invite you to contact our Privacy Officer at the contact information provided below.

6.0 Your rights

We provide the same Services to all of our Clients and End-Users worldwide.

We offer the following rights to all individuals regardless of their location or applicable privacy regulations.

For Personal Information we have about you, you can:

- **Access your Personal Information or request a copy.**

You have the right to obtain information about what Personal Information we collect about you or to obtain a copy of your Personal Information. You may do so by contacting the Privacy Officer identified below.

If you have provided Personal Information to us, you may contact us to obtain an outline of what Personal Information we have about you or a copy of the Personal Information. You may do so by contacting the Privacy Officer identified below.

If you are an End User of the Services, you can log in to see the Personal Information in the account or you may contact us to obtain an outline of what Personal Information we have about you or a copy of the Personal Information. You may do so by contacting the Privacy Officer identified below.

- **You have the right to be notified of what Personal Information we collect about you and how we use it, disclose it and protect it.**

This Policy describes that you may contact us to obtain an outline of what Personal Information we have about you or a copy of the Personal Information we collect and our privacy practices. We may also have additional privacy notices and statements available to you when you provide specific information to us directly.

- **Change or correction of your Personal Information.**

You have the right to update/correct your Personal Information directly if you can do so or ask us to do it on your behalf. You may do so by contacting the Privacy Officer identified below.

You can edit your information through the user account in the Services or ask your employer to change it in their identity provider for cases where your organization integrates with our Services through single sign on or ask us to do it on your behalf. You may do so by contacting the Privacy Officer identified below.

- **Delete or erase your Personal Information.**

You have the right to request deletion of your Personal Information at any time. We will communicate back to you within reasonable timelines the result of your request.

You may do so by contacting the Privacy Officer identified below.

- **Object to the processing of your Personal Information**

You have the right to object to our processing of your Personal Information for direct marketing purposes. This means that we will stop using your Personal Information for these purposes. You may do so by contacting the Privacy Officer identified below.

- **Ask us to restrict the processing of your Personal Information**

You have the right to ask us to limit the way that we use your Personal Information. You may do so by contacting the Privacy Officer identified below.

- **Export your Personal Information.**

You have the right to request that we export to you in a machine-readable format all of the Personal Information we have about you. You may do so by contacting the Privacy Officer identified below.

We do not process personal information through the use of automated means.

- **Withdrawals**

Where we rely on your consent to process Personal Information, you have the right to withdraw or decline your consent at any time. If you have any questions about the lawful bases upon which we collect and use your Personal Information, please contact us at privacy@direxyon.com.

- **Complaints.**

You also have the right to lodge complaints by contacting the Privacy Officer identified below or with the local organizations in charge with enforcing the privacy legislation applicable in your territory.

7.0 Transfer and Storage of Personal Information Abroad

We process data in locations across the globe; as close as possible to the Client head office and rely on legally-provided mechanisms to lawfully transfer data across borders.

Please note that some of our Service Providers who process, manage or store Personal Information on our behalf may be located outside of Canada or outside your head office location. As a result, some of your Personal Information may be transferred to another country and may be subject to the laws of that country.

However, we take care to protect the Personal Information in our custody, including Personal Information entrusted to a Service Provider whether located in Canada or abroad. Our privacy policies and practices require that a written undertaking be signed by such Service Provider to comply with its obligation to maintain the confidentiality and security of Personal Information in its custody. This includes implementing robust and effective security measures and not disclosing your Personal Information to others.

If you have any additional questions on this subject, you may contact our Privacy Officer.

8.0 How long we keep your Personal Information

We retain your Personal Information for as long as it is necessary to provide the Services to you and to ensure that we comply with our legal and regulatory obligations.

We may also retain information to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce our Terms of Service and take other actions permitted by law.

The information we retain will be handled in accordance with this Policy.

If you wish to learn more about how long we keep your Personal Information, we invite you to contact our Privacy Officer, whose contact information is provided below.

Personal Information that is no longer necessary and relevant to provide our Services may be de-identified or aggregated with other non-personal data to provide insights which are commercially valuable to DIREXYON, such as statistics of the use of the Services.

9.0 Communication preferences

You may choose to receive or not receive marketing communications from us. To stop receiving marketing communications, please click the "Unsubscribe" link in the email we sent you.

You may choose which information we collect automatically from your device by controlling cookie settings on your browser or by selecting your preferences through <https://www.direxyon.com/en/privacy-policy>

Even if you opt-out of receiving marketing communications, we may still communicate with you in connection with security and privacy issues, servicing your account, fulfilling your requests, or administering any promotion or any program in which you may have elected to participate.

10.0 Minors

Our Sites and Services are designed for business use and are intended therefore for adults. We do not expect them to be of any interest to a minor under 14 years of age. DIREXYON does not knowingly collect Personal Information from children under the age of 14. Persons under the age of 14 should not use the Services or Sites, not provide DIREXYON with Personal Information. If we learn that we have collected Personal Information from anyone under the age of 18, we will ensure that it is removed from our records as quickly as possible or to obtain the consent of the person having parental authority or of the tutor of such minor.

11.0 Individuals based in European Union (EU), European Economic Area (EEA) and Switzerland or in California

For individuals based in European Union (EU), European Economic Area (EEA) and Switzerland or in California, please refer to the additional sections provided in the Appendix A attached hereto to form an integral part hereof.

12.0 Changes to the Policy

You should check our Website periodically for changes to this Policy. All changes will be posted on the Website as soon as they become effective. DIREXYON reserves the right to make changes to this Policy at any time. Any such changes will be posted on the Website and will be effective immediately upon posting. We will take reasonable steps, if necessary, to notify affected individuals of any material changes. You may contact our Privacy Officer at the coordinates mentioned below to obtain an updated copy of this Policy.

13.0 Privacy Officer Contact Information

DIREXYON is responsible for the Personal Information in its custody or control and has designated a Privacy Officer who is accountable for compliance with this Policy and applicable privacy laws.

If you observe any processing or action by us that does not respect your privacy or have any concerns, questions, requests or complaints about the Policy or the management of your Personal Information by us, we invite you to contact our Privacy Officer, either directly or through our generic email at privacy@direxyon.com.

Maxime Bellerose
CTO and Privacy Officer for DIREXYON

Email: maxime.bellerose@direxyon.com

Mailing adresse:
555, Rene-Levesque Blvd. West Suite 900,
Montréal, Québec, Canada H2Z 1B1
+1 514 845 2500

You also have the possibility to file a complaint in writing to the Commission d'accès à l'information - Direction de la surveillance at the following address: 900-2045 Stanley Street, Montreal, Quebec, H3A 2V4 or by e-mail at cai.communications@cai.gouv.qc.ca or any other authority in charge of privacy in your respective territories.

Appendix A

A.1 For individuals based in European Union (EU), European Economic Area (EEA) and Switzerland.

If you are based in one of these jurisdictions, DIREXYON is the controller of your Personal Information collected in the following instances:

- When you visit our Website <https://www.direxyon.com/>
- When we process your Personal Information for sales and marketing purposes

DIREXYON is a processor of all Personal Information processed on the Services, on behalf of our Clients. We only process the Personal Information under their direction. Please contact your employer or the organization that granted you access to the Services for details on their privacy practices.

We only process Personal Information if we have a lawful basis for doing so. The lawful bases applicable to our processing as controller are:

- **Consent** - We will ask for your express and informed consent every time we collect your Personal Information on this legal basis.
- **Contractual basis** - We process the Personal Information as necessary to fulfill our contractual terms with you or our Clients.
- **Legitimate interest** - We process the names, contact details, job titles, companies of our existing and prospective clients for our marketing purposes, including market research and sales leads generation.

You have the following rights under the General Data Protection Regulation (“GDPR”):

- Be informed about the collection and use of your Personal Information
- Access your Personal Information
- Correct errors in your Personal Information
- Erase your Personal Information
- Object to the processing of your Personal Information.
 - This right is also available to individuals whose Personal Information is processed by us for direct marketing purposes. If you object to the processing of your Personal Information for direct marketing purposes, we shall stop processing within 30 days of receipt of your request.
- Export your Personal Information
- Restrict our processing of your Personal Information for specific reasons, including any of the purposes supported by the legitimate interest legal bases. (see the section above).

We process Personal Information in process data in locations across the globe; as close as possible to the Client head office.

You may contact us at privacy@direxyon.com.

You may also lodge a complaint with your local supervisory authority, EU Data Protection Authorities (DPAs) or Swiss Federal Data Protection and Information Commissioner (FDPIC). See their contact details here [National Data Protection Authorities](#).

A.2 For individuals based in California

This section provides additional specific information for consumers based in California as required by the California Consumer Privacy Act of 2018 (“CCPA”).

A.2.1 Collection and Use of Personal Information

In the last 12 months, we have collected the following categories of personal information:

- Identifiers, such as your name, mailing address, email address, zip code, telephone number, or other similar identifiers.
- California Customer Records (Cal. Civ. Code § 1798.80(e)), such as username and password, company name, job title, business email address, and department.
- Internet/Network Information, such as your browsing history, log and analytics data, information about the device(s) used to access the Services and information regarding your interaction with our websites or Services and other usage data.
- Geolocation Data, such as information about your location (at country and city level) collected from your IP address.
- Sensory Information, the content, audio and video recordings of conference calls between you and us that we record where permitted by you and/or the law.
- Profession/Employment Information that you include in your CV, cover letter and send to us when applying for a position.
- Other Personal Information, such as personal information you provide to us in relation to a survey, comment, question, request, article download or inquiry and any other information you upload to our Application.

We collect personal information directly from you, from your browser or device when you visit our websites, from third parties that you permit to share your information or from third parties that share public information about you and as stated above.

See the section above, "How we use personal information," to understand how we use the personal information collected from California consumers.

A.2.2 Recipients of Personal Information

We share personal information with third parties for business purposes. The categories of third parties to whom we disclose your personal information may include: (i) our service providers and advisors, (ii) marketing and strategic partners; (iii) ad networks and advertising partners; (iv) analytics providers; and (v) social networks.

Please see the "How We Share Information" section of the Privacy Policy above for more information.

A.2.3 California Privacy Rights

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- The Right to Know any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:
 - The specific pieces of personal information we have collected about you;
 - The categories of personal information we have collected about you;
 - The categories of sources of the personal information;
 - The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
 - The categories of personal information we have sold and the categories of third parties to whom the information was sold; and
 - The business or commercial purposes for collecting or selling the personal information.
- The Right to Request Deletion of personal information we have collected from you, subject to certain exceptions.
- The Right to Opt-Out of Personal Information sales to third parties now or in the future. However, **we do not sell** your personal information.

You also have the right to be free of discrimination for exercising these rights.

Please note that if the exercise of these rights limits our ability to process personal information (such as a deletion request), we may no longer be able to provide you with our products and services or engage with you in the same manner.

A.2.4 How to Exercise Your California Consumer Rights

To exercise your right to know and/or your right to deletion, please submit a request by contacting us at privacy@direxyon.com.

We will need to verify your identity before processing your request.

In order to verify your identity, we will generally require sufficient information from you so that we can match it to the information we maintain about you in our systems. Sometimes we may need additional personal information from you to be able to identify you. We will notify you.

We may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity or locate your information in our systems or as permitted by law.

You may choose to designate an authorized agent to make a request under the CCPA on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Once a request has been submitted by an authorized agent, we may require additional information (i.e. written authorization from you) to confirm the authorized agent's authority.

If you are an employee/former employee of a DIREXYON Technologies Client that uses our application and services, please direct your requests and/or questions directly to your employer/former employer.

If you are a third party (auditor, business associate etc.), who was given access to the DIREXYON Technologies application by a DIREXYON Technologies Client, please direct your requests and/or questions directly to the DIREXYON Technologies Client that gave you access.