

## Chiral Data Privacy Policy

Effective Date: October 22, 2024

**POLICY STATEMENT:** This Privacy Policy describes how CHIRAL collects, stores, and processes personal data received from customers, customer employees, website visitors, job applicants, and others. “Personal data” means any information provided to CHIRAL that relates to an identified or identifiable individual.

**PURPOSE:** CHIRAL is committed to protecting the collection, use, and disclosure of personal information provided by its clients. We follow industry best practices to safeguard customer data, including methods for secure retention, deletion, and encryption.

**POLICY:** We may collect, process, and store personal data as necessary to deliver our products and services to customers and to meet legal and contractual obligations.

CHIRAL uses encryption to protect data both in transit and at rest and follows widely accepted industry standards for safeguarding sensitive information.

Technical, physical, and administrative measures are implemented to help prevent unauthorized access, loss, misuse, or disclosure of personal data.

### **From CHIRAL Job Applicants and CHIRAL Employees:**

We collect personal data from job applicants to conduct applicant review and hiring activities. We also collect data from employees to fulfill human resources responsibilities such as administering payroll, benefits, and performance management, consistent with applicable law.

**For a CHIRAL Job Applicant or CHIRAL Employee:** Employee personal data may be accessed by authorized teams or subcontractors in Canada or other countries as necessary to fulfill these obligations. Reasonable steps are taken to ensure all data is accurate, complete, and current for its intended use.

### **From Visitors to our Websites**

We may collect personal data such as name, company name, IP address, and email or physical address, directly when visitors interact with our website, submit forms, request support, or use other services. By voluntarily providing this information, visitors consent to its use in accordance with this Privacy Policy.

Data may be transferred from a visitor's location to secure servers maintained by CHIRAL or authorized service providers in Canada or other jurisdictions, consistent with applicable law

**Non-identifiable Information:** When visiting our site, we may receive certain personally non-identifiable information about those visitors. This data may be stored by CHIRAL or its service providers and used to analyze website traffic and improve our services.

**Information Collected via Cookies and Similar Technologies:** We use cookies, web beacons, and similar technologies to collect information such as browser type, operating system, IP address, timestamps, and website interaction patterns. These tools help us understand how our site is used and improve functionality. Information may be associated with other data provided voluntarily.

**Social Media Use:** Social media may be used for communication and marketing purposes, including sharing timely updates in the event of disruptions or emergencies. Security and privacy are considered when using social media platforms.

CHIRAL uses social media in accordance with applicable privacy, copyright, and brand laws. Information that could identify customers, employees, or vendors is not shared without authorization. CHIRAL ensures all social media content reflects a professional standard.

Our website may include social media features, such as "Like" or "Share" buttons. These features may collect information such as your IP address or pages visited and may set cookies to enable their functionality. Interactions with these features are governed by the privacy policies of the relevant third parties.

Company email addresses may not be used to register for personal accounts on social media or unrelated online platforms.

**Personal Blogs and Posts:** Public content referencing CHIRAL must not include confidential or proprietary information. Any personal online activity that associates with CHIRAL should follow legal and professional standards.

**Research:** We may conduct aggregate research on user interests and demographics to improve our services. This information is anonymized and may be shared with trusted affiliates or service providers.

### **How CHIRAL Uses Personal Data**

**If Personal Data is Provided to us Directly in Another Manner:** We may use personal data in connection with the reason for which it was provided, such as to deliver a product or service, respond to inquiries, or provide technical support. We may also use it to send important product or service notices, investigate illegal activity, or otherwise use it as disclosed at the time of collection.

We may contact website visitors with information about our services, based on their prior consent or our legitimate interest in maintaining communication. All recipients will have the ability to opt out of further communications.

**For Employees of a CHIRAL Customer:** When CHIRAL processes customer employee data, it is used solely to deliver contracted products or services in accordance with customer instructions.

### **Our Disclosure of Personal Data**

CHIRAL does not sell, rent, or otherwise share customer, employee, or personal data with third parties for their independent promotional purposes.

CHIRAL will not use, share, or distribute personal data except as follows: as necessary to maintain the security of our products, as required by applicable law, as described in a contract between CHIRAL and our customer, or as otherwise set forth in the subsequent paragraphs of this section directly below.

**Business Transfers:** In the event of a business transaction such as a merger, acquisition, or sale, personal data may be transferred as part of the assets.

**Partners and related third parties:** We may also share data with partners or service providers to help deliver our offerings or support customer engagement, based on prior consent or where a legitimate interest applies.

**Legal Requirements:** We may disclose data to comply with laws, protect CHIRAL's legal rights, or ensure the safety of our users or the public.

### **Access and Control of Personal Data**

**Employees of CHIRAL Customers:** Employees of CHIRAL customers should contact their employer to access or control personal data provided to CHIRAL in connection with services.

**CHIRAL Job Applicants:** Job applicants may contact their CHIRAL recruiting or HR representative to manage personal data submitted during the hiring process.

**CHIRAL Employees:** CHIRAL employees may contact HR to request access to or updates of their employment-related personal data.

**Retention of Information:** We retain personal data for as long as necessary to provide requested services or fulfill applicable obligations. Retention periods may vary depending on the context of data collection and are determined in accordance with legal, contractual, or operational requirements.

**Opt-outs:** To update personal data or withdraw consent for communications (e.g., types of marketing materials, newsletters, etc.), you may contact us at [support@chiralsystems.com](mailto:support@chiralsystems.com). We will respond to your request within a reasonable time frame, typically within 30 days.

**Contacting Us with Questions:** You may contact us in the event you have questions about this Data Privacy Policy or any of our information practices, or if you have a question concerning the handling of your personal data, at: [support@chiralsystems.com](mailto:support@chiralsystems.com).



**Changes to Our Privacy Policy:** At times it may be necessary for us to make changes to this Data Privacy Policy. Accordingly, we reserve the right to update or modify this Data Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any personal data to us. Your continued disclosure of personal data to us after any changes or revisions to this Data Privacy Policy shall indicate your agreement with the terms of such revised Data Privacy Policy.