

## VIQ SOLUTIONS INC. PRIVACY POLICY

At VIQ Solutions Inc., we take the Privacy of our Customers, visitors, and users, (collectively "Users" or individually a "User") seriously. This VIQ Solutions Inc. Privacy Policy ("Privacy Policy") describes our privacy practices and applies to all of the voice and video capture/transcription products and services (collectively, the "Services"), we offer to Users, as well as to our websites. Please read this Privacy Policy carefully to learn how we collect, use, share and otherwise process personally identifiable information, and information that can reasonably be used to contact or distinguish a person, (collectively "Personal Data"), and your rights and choices regarding our processing of your Personal Data.

A reference to "VIQ", "we," "us," "our," or the "Company" is a reference to VIQ Solutions Inc, a Canadian company, and includes VIQ's subsidiaries and affiliates ("Related Companies"). A reference to "you" or "your" means the User, individual, or if applicable, the company or legal entity you represent.

### 1. Activities Covered

This Privacy Policy applies to the following activities:

- The use of our Services;
- Visiting our websites
- Creating, changing or using an account or User profile;
- Browser web storage, application data caches or similar technologies;
- Social media platforms and applications, or demographics derived from the profiles Users create;
- Visiting our offices;
- Entering into transactions with our Customers;
- Interacting with our personnel, whether in person, on the telephone, via email or any other form of communication;
- Interacting with and submitting inquiries to third parties with whom we have a relationship; and
- Receiving communications from us, including emails, texts, fax, push or in-application notifications

In particular, this Privacy Policy sets forth VIQ's policy with respect to its processing of two types of data:

- Personal Data that users of our Services ("Customers") ask us to process on their behalf ("Processor Data"), which will include any Personal Data that Customers provide to us to transcribe, capture, translate, or otherwise process for them. VIQ is the "processor" of the data under applicable law, and the Customer is the "controller", when VIQ processes personal data on behalf of a Customer. Any Processor Data collected is done so based on VIQ's reliance upon representations made by VIQ's Customer as to their lawful right to collect the applicable Personal Data.
- Data, including Personal Data, that we process for our own business ("Controller Data"), other than for our human resources and recruiting operations. This includes, for example, the information we collect through any of our websites and the names and contact information of our Customers and vendors. Under applicable law, VIQ is deemed to be the "Controller" of such data.

When webpages and applications (mobile or otherwise) are controlled by us and links to this Privacy Policy (each a “Site” and collectively “Sites”), this Privacy Policy applies. Our websites may contain links to other websites, applications and services maintained by third parties in which case the privacy policy of such third party applies and this Privacy Policy does not apply. The information practices of such other services are governed by the third-party privacy policies, which we encourage you to review to better understand those third parties’ privacy practices.

## 2. VIQ’s collection, use, and disclosure of Processor Data:

We receive information from or on behalf of our Customers and their users. Users may upload file information to VIQ. The File Upload feature is to upload audio and video files that the user already has on their devices. The users use this feature when requesting services. Because of the nature of the Services, this information may contain any type of personal data, including names, gender, and age of the accused and witnesses, contact information, location, date, time, judge or adjudicator name, attorney names and gender, incident descriptions, and other identifying information. In some but not all cases, this content is protected by Customer-managed encryption and credentials, but in some instances VIQ’s employees and contractors may have access to this information, or the right to manage it on behalf of Customers.

Subject to our contractual obligations with our Customers, and depending on the particular Services, we use and disclose Processor Data as follows:

- **Providing Services:** To provide, maintain, and improve the Services, including by analyzing the Services and addressing security and business continuity issues.
- **Protecting Us and Others:** To enforce the legal terms that govern the Services.
- **Compliance with Laws:** To comply with law, and where we deem disclosure appropriate to protect rights, safety and property (for example, for national security or law enforcement).
- **Business Transfers:** As part of an actual or contemplated business sale, merger, consolidation, change in control, transfer of substantial assets or reorganization.
- **Consistent with Customer Requirements:** For other purposes requested or permitted by our Customers or their users, or as reasonably required to perform our business.

Subject to our contractual obligations with our Customers, and depending on the particular Services, we share Processor Data as follows:

- **Business Transfers:**As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, including during negotiations of such an event, Processor Data may be part of the transferred assets.
- **Related Companies:** We may also share Processor Data with our Related Companies for purposes consistent with this Privacy Policy.
- **Agents, Consultants and Related Third Parties:** VIQ, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include, without limit, maintaining databases.
- **Legal Requirements:** VIQ may disclose Processor Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation,

- (ii) protect and defend the rights or property of VIQ, (iii) act in urgent circumstances to protect the personal safety of the general public, or (iv) protect against legal liability.
- **Consistent with Customer Requirements:** VIQ will disclose Processor Data for other purposes requested or permitted by our Customers or Users, or as reasonably required to perform our business.

### 3. VIQ's collection, use and disclosure of Controller Data

When you interact with us through the Site or the Services, or become a Customer or are a vendor, we may collect Personal Data and other information from you, as further described below:

**Personal Data that You Provide Directly to Us:** We collect Personal Data from you when you voluntarily provide such information, such as when you register for access to the Services (for example, your name and mailing address), use certain Services, contact us with inquiries, respond to one of our surveys, or contract with us. Wherever VIQ collects Personal Data we make an effort to provide a link to this Privacy Policy.

**Personal Data that We Collect from Third Parties:** We collect Personal Data from third parties, such as lead generation firms.

**By voluntarily providing us with Personal Data, you acknowledge that you have read this Privacy Policy and understand that such Personal Data may be transferred from your current location to the offices and servers of VIQ and the authorized third parties referred to herein located in the North Americas, which may not offer the same level of protection as the country in which you are located.**

We use Controller Data as follows:

- **Providing Services:** To provide, maintain, and improve the Services, including by analyzing the Services and addressing security and business continuity issues. For instance, if you contact us by email, we will use the personal data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Services, we will use your Personal Data to provide you with access to and to monitor your use of such Services.
- **Communications:** To communicate with you regarding the Services or provide information we believe will be of interest to you. If we do so, each such communication we send you will contain instructions permitting you to “opt-out” of receiving future marketing communications. Note however that as user of the Service you cannot opt-out of some administrative communications that are reasonably necessary to the Service, such as billing or service notifications. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.
- **Protecting Us and Others:** To enforce the legal terms that govern the Services.
- **Compliance with Laws:** To comply with law, and where we deem disclosure appropriate to protect rights, safety and property (for example, for national security or law enforcement).
- **Business Transfers:** As part of an actual or contemplated business sale, merger, consolidation, change in control, transfer of substantial assets or reorganization.

- **Consistent with Customer Requirements:** For other purposes requested or permitted by our Customers or their users, or as reasonably required to perform our business.

#### **4. What Personal Data do we Collect?**

##### **4.1 Personal Data we collect directly from you may include the following:**

- if you express an interest in obtaining additional information about our Services, request customer support, use our “Contact Us” or similar features, register to use our websites, or download certain content, we generally require you to provide us with your contact information, such as your first and last name, email address, job title, company name, company address, company address, social media usernames, and account ID and password;
- if you make purchases via our websites, we may also require you to provide us with financial information and billing information, such as billing name and address, credit card information, as well as shipping information, if applicable. We also record your transaction history with us;
- if you use and interact with our websites, we automatically collect log files and other information about your device and your usage of our websites through cookies, web beacons or similar technologies, such as IP-addresses or other identifiers, which may qualify as Personal Data (view the “What device and usage data we process” section below);
- if you visit our offices, you may be required to register as a visitor and to provide your name, email address, phone number, company name and time and date of arrival.

##### **4.2 Third Party Analytics Providers**

We may use third-party analytics services similar to and including, without limitation, Google Analytics provided by Google Inc. (“Google”) (collectively “Third Party Analytics Providers”).

These Third-Party Analytics Providers use cookies and similar technologies to analyze how individuals use our services, market to past and prospective visitors, and compile statistical reports. Such services may also collect or derive information about visitors’ use of other websites or properties.

As a User, you acknowledge that you accept and consent to our privacy practices as well as those practices indicated in the privacy policies of Google Analytics, Facebook and any other Third-Party Analytics Providers we use as linked below.

The following is a list of Third-Party Analytics Providers with whom we partner to place advertisements across the internet.

Name of Third-Party Partner	What info is shared with or collected by this partner	Partner's purpose	Link to Partner's privacy policy
Google Adwords, & Ads Manager	Anonymous order information, IP, and URL clickstream	Ad network	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>
Google-analytics	Anonymous IP, URL clickstream related to viewing specific designer's products and stores.	Analytics	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

### 4.3 Remarketing

VIQ's Sites use the Third-Party Analytics Providers to advertise on third party websites to previous visitors to our site. This could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an inquiry, looking at a product page or initiating a purchase even if such if it is not completed. Such remarketing could be in the form of an advertisement on the Google search results page, a site in the Google Display Network or site in another network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the VIQ.com website. Data collected from our sites will be used in accordance with our Privacy Policy and the privacy policy of the applicable third-party vendor.

### 5. Purposes for which we process Personal Data and the legal basis upon which we rely.

The laws in some jurisdictions require companies to tell you about the legal ground they rely upon to use or disclose Personal Data. To the extent those laws apply, our legal grounds for processing Controller Data are as follows:

- To process and respond to your inquiries and requests. We will process your Personal Data to the extent this is necessary for the performance of our contract with you for the use of our Sites and to fulfill our obligations under the applicable terms of use/service; where we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to operate and administer our Sites and to provide you with content you access and request;
- to alert you to new developments, promotions, specials, special events, products or services or other activities and to administer same interests to the extent it is necessary for our legitimate interests to advertise our websites or, where necessary, to the extent you have provided your prior separate consent (please also view "Your Rights Relating to Your Personal Data" below to learn how you can control how your Personal Data is processed by VIQ for marketing purposes);
- for the purposes for which you provided the information, for the legitimate business purpose of fulfilling our Customers' requests;

- to monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems of our websites, for the legitimate business interest of operating and administering our websites and service;
- to carry out internal operations and to analyze our users' demographics and interests, for the legitimate business interests of understanding our current and potential customer demographics;
- for fraud prevention, internal operations, legal compliance, and other public and security related purposes, to the extent this is necessary for the purpose of our legitimate interests in promoting the safety and security of the systems and application used for our websites, and protecting our rights and the rights of others;
- to enforce any of our other policies and/or agreements with our Users or Customers on the basis of the performance of our contract with you; and
- to contact you with problems or updates regarding your account, we will process your Personal Data for the performance of our contract with you and to the extent it is necessary for the purpose of our legitimate interests to fulfill your request and communicate with you; and
- complying with legal obligations: We will process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights, and is necessary for our legitimate interests to protect against misuse or abuse of our websites, to protect personal property or safety, to pursue remedies available to us and limit our damages, to comply with a judicial proceedings, court order or legal process, and/or to respond to lawful requests.

Where we need to collect and process Personal Data by law, or under a contract we have entered into with you and you fail to provide that required Personal Data when requested, we may not be able to perform the contract.

## **6. Children**

Our websites are not directed at children. We do not knowingly collect Personal Data from children under the age of 13. VIQ websites are intended for users over the age of 18. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us as described in the "Contacting Us" section below and we will take steps to delete such Personal Data from our systems.

## **7. How long do we keep your Personal Data?**

We may retain your Personal Data for a period consistent with the original purpose of collection (see "Purposes for which we process Personal Data and on what legal basis" section above). We determine the appropriate retention period for Personal Data on the basis of the amount, nature, and sensitivity of your Personal Data, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements (such as applicable statutes of limitation).

After expiry of the retention periods, your Personal Data will be deleted. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of the data.

## 8. Your rights relating to your Personal Data.

### 8.1 Your rights

You have certain rights regarding your Personal Data, subject to local data protection laws. These may or may not include the following rights:

- to access your Personal Data held by us (right to access);
- to rectify inaccurate Personal Data and ensure it is complete and updated (right to rectification);
- to erase/delete your Personal Data to the extent permitted by other legal obligations (right to erasure; right to be forgotten);
- to restrict our processing of your Personal Data (right to restriction of processing);
- to transfer your Personal Data to another controller to the extent possible (right to data portability);
- to object to any processing of your Personal Data carried out based on our legitimate interests (right to object). Where we process your Personal Data for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects (“Automated Decision-Making”);
- to the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

The specific rights to which you are entitled are based upon your geographic location, and the location of where your Personal Data is stored.

### 8.2 How to exercise your rights

**For Processor Data:** To exercise your rights, please contact us in accordance with the “Contacting Us” section below. We try to respond to all legitimate requests that relate to accuracy and completeness of Personal Data, as well as requests made within the parameters of local privacy laws that apply to you, within one month and will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than a month, considering the complexity and number of requests we receive.

**For Controller Data:** To exercise your rights, please contact us in accordance with the “Contacting Us” section below. We try to respond to all legitimate requests that relate to accuracy and completeness of Personal Data, as well as requests made within the parameters of local privacy laws that apply to you, within one month and will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than a month, considering the complexity and number of requests we receive.

In addition, if you have registered for an account with us, you may generally update your user settings, profile, organization’s settings or event registration by logging into the applicable Site with your username and password and editing your settings or profile. To update your billing

information, discontinue your account, and/or request return or deletion of your Personal Data and other information associated with your account, please contact us.

### **8.3 Your rights relating to Customer Data**

If your data has been submitted to us by an VIQ customer and you wish to exercise any rights you may have under applicable data protection laws, please inquire with our Customer directly. Because we may only access our Customer's data upon instruction from the respective Customer, if you wish to make your request directly to us, please provide the name of the VIQ customer who submitted your data to VIQ when you contact us. We will refer your request to that Customer and will support them as needed in responding to your request within a reasonable timeframe.

### **8.4 Your preferences for marketing communications**

If we process your Personal Data for the purpose of sending you marketing communications, you may manage your receipt of marketing and non-transactional communications from us by clicking on the "unsubscribe" link located on the bottom of our marketing emails, by replying or texting 'STOP' if you receive SMS communications, or by turning off push notifications from our Site on your device. Additionally, you may unsubscribe by contacting us using the information in the "Contacting Us" section below. Please note that opting-out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as information about your subscriptions or event registrations, service announcements or security information.

## **9. Security**

We take precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the Personal Data we process or use.

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices, and signing out of websites after your sessions. If you have any questions about the security of our websites, please contact us via the "Contacting Us" section below.

## **10. Changes to this Privacy Policy**

We will update this Privacy Policy from time to time in our sole discretion to reflect changes in our practices, technology, legal requirements and other factors. If we do, we will update the "effective date" at the top of this Privacy Policy. If we make an update, we may provide you with notice prior to the update taking effect, such as by posting a conspicuous notice on our website or by contacting you using the email address you provided.

We encourage you to periodically review this Privacy Policy to stay informed about our collection, processing and sharing of your Personal Data.

## **11. Contacting Us**



To exercise your rights regarding your Personal Data, or if you have questions regarding this Privacy Policy or our privacy practices please mail us at:

VIQ Solutions Inc.  
5915 Airport Road, Suite 700  
Mississauga, ON, Canada  
L4V 1T1  
Attn: Legal Department  
Email: [legal@viqsolutions.com](mailto:legal@viqsolutions.com)

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.