

Privacy Policy

Adopt Inc. undertakes to protect the privacy of its Participants and Visitors' Personal Information and any other information which concerns them and which is obtained in connection with the Site or its use thereof.

In this respect, Adopt Inc. has put in place this Privacy Policy, which hereby governs the collection, use, storage, sharing and destruction of Personal Information and namely describes: (i) the type of Personal Information and other information that Adopt Inc. collects; (ii) the reasons why Adopt Inc. collects them; (iii) the way that Adopt Inc. uses and protects them; and (iv) the circumstances under which Adopt Inc. shares such information with Institutional Business Partners and Great Adopters, or any other person when required by law or when provided for in this Privacy Policy.

1. Definitions and Interpretation

For the purposes herein, the terms set forth in this Section have the meanings assigned to them below :

- **“Adopt Inc.”** designates The Adopt Inc. Movement, a non-profit corporation duly constituted under Part III of the *Canada Corporations Act*, RLRQ C. C-38.
- **“Cookies”** designates the small text files that are placed on the hard disk of Participants and Visitors' devices when they browse the Site, and which either disappear from said device when Participants or Visitors close their browser software or turn off their device (in cases of session-based Cookies) or remain on said device even if Participants and Visitors close their browser or turn off their device (in case of persistent-based Cookies).
- **“Great Adopters”** refers to the recognized business leaders taking part in the Program, whose names are indicated on the Site.
- **“Institutional Business Partners”** refers to Adopt Inc.'s business partners, whose names are indicated on the Site and whom namely participate in the selection of the “adoption files”.
- **“Participant”** designates any young entrepreneur of the Province of Québec submitting his application in connection with the Program by completing an “adoption request”, available on the Site.
- **“Personal Information”** means any information about an identifiable individual, such as his name, telephone number, address, email address and date of birth.
- **“Program”** refers to the program, which allows Participants (whose “adoption request” is retained) to have access to numerous training programs and other advantages, and perhaps even to benefit from twelve (12) months of salary and from the mentoring of a Great Adopter.
- **“Site”** refers to the Adopt inc's website, namely : www.adopte-inc.com
- **“Visitors”** means the individuals which browse the Site.

Grammatical variations of the terms defined herein have a similar meaning than that which is given to them. Unless the context requires otherwise, words importing the singular number shall include the plural and words importing the masculine gender shall extend to and include the feminine gender and neuter genders and *vice versa*.

2. Collection and Use of Personal Information

As part of the Program, Adopt Inc. shall collect various information about the Participants, in the manner set forth below. Adopt Inc. shall also collect information about the Visitors when they browse the Site.

2.1 Information obtained by Participants and Visitors

- **“Adoption request”**

Any person who wishes to participate in the Program shall undertake the registration process made available on the Site. With this regard, each Participant shall indicate, in his “adoption request”, his complete name, date of birth, e-mail address, telephone number and the city and administrative region he lives in. This information is necessary in that it allows Adopt Inc. to identify the Participant, to determine which age group the Participant identifies with and to contact the Participant in the event that he is selected. Also, each Participant shall communicate various information about his business project, write a five hundred (500) word essay in support of his application and finally submit a one (1) minute video presentation. Such information is required in order for Adopt Inc. to proceed to the pre-selection and selection of the candidates, as detailed below.

- **Information shared on Facebook and other social medias**

Adopt Inc. shares information about itself and about the Program on Facebook. Similarly, Participants and Visitors sending or accepting Adopt Inc’s “friend request” or otherwise “following” Adopt Inc. share information about themselves that said Participants and Visitors (or their “Facebook friends”) post on their Facebook page. Accordingly, Adopt Inc. may see or consult the information available on these Facebook pages such as their name, age and city, as well as any other information made available on their “wall” or page. Also, Participants and Visitors following Adopt Inc. through other social platforms such as Twitter may exchange information with the latter. In such a case, Adopt Inc. will have access to information that the Participants and Visitors will have shared and will also be notified when they will have “tweeted” about Adopt Inc.

Participants and Visitors can always select the audience with which they share information. Accordingly, unless Participants and Visitors limit the information displayed via their “privacy settings” or the “audience selector”, Participants and Visitors are deemed to have agreed to sharing such information with their “friends” or persons they “follow”, including Adopt Inc.

2.2. Information obtained through Cookies

When Participants and Visitors browse the Site, a unique identifier is assigned to their device. This unique identifier is associated with Cookies, which are installed on their browser in order to obtain information on these Participants and Visitors. Some Cookies are “temporary” and disappear once the Participants and Visitors turn off their electronic device or close their browser, while others are “permanent” and remain present even after the device or browser is turned off. For instance, Adopt Inc. uses the following cookies:

- **Preference Cookies** : Preference Cookies allow the Site to remember information, such as the IP addresses of the Participants and Visitors and the parameters chosen by them. This allows Adopt Inc. to recognize Participants and Visitors when they use the Site again and thus to enhance their browsing experience by avoiding that Participants and Visitors need to recurrently select settings and other information.
- **Statistical Cookies** : Statistical Cookies gather information for statistical and analytical purposes regarding the manner in which the Participants and Visitors interact with the Site, as well as the information on (or concerning) the device used to access the Site.
- **Process Cookies** : Process Cookies ensure consistency throughout the Site when Participants and Visitors browse from one page to another.
- **Security Cookies** : Security Cookies ensure the security of the Personal Information transmitted, namely when Participants submit their “adoption request” and other information in connection with the Program by allowing Adopt Inc. to identify Participants in order to prevent any fraudulent use of their login credentials and protect Personal Information against any and all interception or unauthorized access.

Participants and Visitors are given the possibility to accept or decline Adopt Inc.’s use of Statistical and Preference Cookies on the Site by deactivating them and blocking them via their browser. Blocking or deleting Cookies will not render the foregoing unusable but may make the Participants and Visitors’

experience somewhat less enjoyable, as they will be treated as new visitors every time they enter the Site. However, Participants and Visitors cannot block or delete the Process and Security Cookies because these are essential for ensuring the security and integrity of the Site. Participants or Visitors which encounter problems with the functionality of the Site are invited to contact Adopt Inc. at the address mentioned at point 9 below.

2.3 Information obtained by third parties

Adopt Inc. uses Google Analytics, a technology developed by Google. This technology allows for data collection with regard to the interactions that Participants and Visitors have with the Site. This collection of information shall be completed through codes placed on the Site, permitting Google Analytics to see what information was consulted by Participants and Visitors, as well as the type of browser and device that was used. The information collected will then be processed by Google (on its platform) and subsequently transmitted to Adopt Inc. Finally, this information will continually be updated in light of the new data obtained from time to time from Google Analytics.

3. Sharing of Personal Information and Other Information

Unless described in this Privacy Policy, Adopt. Inc. will not share or make otherwise available any Personal Information collected or obtained via this Site.

3.1 Selection of applications

Personal Information shall not be used or communicated to third parties for purposes other than those for which they were collected, unless the Participant or Visitor has consented or unless the law allows for such use or disclosure. With this regard, Adopt Inc. shall disclose to its Institutional Business Partners and to the Great Adopters the Participants' application files in the following manner :

- Adopt Inc., or the partner that will have been mandated to this effect, shall proceed to a pre-selection of candidates. During this pre-selection process, only the founders and employees of Adopt Inc. (or its mandatory's employees) shall be given access to Participants' application files on a "need-to-know" basis.
- Once this pre-selection process is completed, Adopt Inc. shall transmit the retained application files to its Institutional Business Partners which shall, in turn, proceed to the revision of the "adoption requests" of the remaining Participants.
- Finally, the application files which are retained by Adopt Inc.'s Institutional Business Partners shall be given to the Great Adopters who will subsequently decide which Participants shall be mentored and benefit from the advantages of the Program.

In-person interviews may take place as part of the pre-selection and the selection process. To this effect and whenever necessary, Adopt Inc. shall communicate with the Participants to inform them of the taking place of such interview and take all proper arrangements in connection therewith.

Any person having access to the application files shall be required to maintain the confidentiality of the Personal Information contained therein and shall use such information only for the purposes described hereinabove and for no other purpose whatsoever. With this regard, Adopt Inc. shall notably ensure that its Institutional Business Partners and the Great Adopters are contractually obliged to respect the confidentiality of the Personal Information that they will have access to in connection with the Program and to act in accordance with the terms and conditions of this Privacy Policy at all times.

3.2 Disclosures permitted by law

Adopt Inc. reserves the right to use or disclose Personal Information and any other information should such use or disclosure be necessary for the protection of its rights, in order for it to comply with its legal

obligations or a court order or for any other reason provided by law authorising or requiring such disclosure or use.

3.3 Depersonalized information

Adopt Inc. may use, on an aggregate basis, depersonalized information (i.e. personal information of which names and other identifiers have been removed so that this information cannot be linked to an identifiable individual) for training, research, promotional and any other purposes, whether commercial or not, given that the law does not provide any restrictions with regard to the use and disclosure of such information.

4. Retention of Personal Information

Adopt Inc. shall retain and store the Personal Information only for the purposes described hereinabove and for as long as it is necessary to do so for such purposes. Notwithstanding the foregoing, Adopt Inc. may retain such information for an additional period if it is reasonably necessary in order to : (i) comply with applicable law; (ii) resolve any disagreement, dispute or misunderstanding; (iii) prevent fraud, abuse or violation of applicable laws; or (iv) enforce the terms of the present Privacy Policy. Such retention of Personal Information shall be made in accordance with the retention, storage and destruction measures adopted by Adopt Inc. from time to time.

5. Security Measures

Adopt Inc. uses numerous security measures to protect the security and confidentiality of the Personal Information against the loss, theft and unauthorized access, disclosure, reproduction use or modification, namely :

- SSL Technology : “Secure Sockets Layer” technology protects Personal Information by authenticating the server and encrypting data. This technology ensures that Personal Information is safe, secure and made available only to persons whom are duly authorized. When such technology is activated, an SSL connection key shall be displayed in the left corner of the browser in order to confirm access to the secured server. In addition, the browser’s URL line or Internet bar should change from “http” to “https”.
- Limited Access : Access to Personal Information is granted to Adopt Inc.’s personnel, its Institutional Business Partners and the Great Adopters on a “need-to-know” basis as part of the Program. In all cases, Adopt Inc. shall (i) use organisational measures to ensure that its personnel respects the confidentiality of the Personal Information; and (ii) conclude any and all confidentiality agreements deemed necessary with its Institutional Business Partners and the Great Adopters.

NOTWITHSTANDING THE FOREGOING AND EVEN IF ADOPT INC. AIMS TO PUT IN PLACE ANY AND ALL NECESSARY MEASURES TO PROTECT AND ENSURE THE CONFIDENTIALITY OF PERSONAL INFORMATION, NO METHOD OF TRANSMISSION OF PERSONAL INFORMATION – INCLUDING VIA ELECTRONIC MEANS OVER THE INTERNET – IS PERFECTLY SECURE OR PROTECTED AGAINST PIRACY, CYBERATTACKS OR SIMILAR EVENTS. CONSEQUENTLY, ADOPT INC. CANNOT GUARANTEE THE ABSOLUTE SECURITY OF SUCH INFORMATION. MOREOVER, ADOPT INC. INSISTS ON THE FACT THAT IDENTITY THIEVES SOMETIMES SEND FRAUDULENT E-MAILS, WHICH ENCOURAGE INTERNET USERS TO DISCLOSE PERSONAL OR FINANCIAL INFORMATION. IN THE EVENT THAT PARTICIPANTS OR VISITORS RECEIVE SUCH E-MAIL WHICH APPEARS TO COME FROM ADOPT INC. AND REQUIRES THEM TO TRANSMIT PERSONAL OR FINANCIAL INFORMATION, PARTICIPANTS SHOULD REFRAIN FROM RESPONDING TO SUCH E-MAIL AND NOT PROVIDE ANY SUCH INFORMATION. ADOPT INC. WILL NEVER ASK ITS ANY FINANCIAL OR OTHER PERSONAL INFORMATION VIA E-MAIL.

LASTLY, ADOPT INC. USES, KEEPS AND STORES THE PERSONAL INFORMATION ON ITS SERVERS LOCATED IN NORTH VIRGINIA IN THE UNITED STATES OF AMERICA. ACCORDINGLY, THE RULES OF THIS JURISDICTION WHICH ARE APPLICABLE TO THE PERSONAL INFORMATION MAY DIFFER FROM THOSE IN EFFECT IN QUÉBEC AND NAMELY ALLOW OR AUTHORIZE THE DISCLOSURE OF PERSONAL INFORMATION IN ADDITIONAL OR DIFFERENT CIRCUMSTANCES THAN THOSE MENTIONED HEREIN, ALL IN ACCORDANCE WITH THE APPLICABLE LAWS OF THIS

6. Links to Third Parties' Websites

Adopt Inc. may provide, on its Site, links to other websites or pages of interests. With this regard, Adopt Inc. underlines that its Site operates independently of such websites and pages and that they are consequently subject to their own confidentiality and security policies. This being said, Adopt Inc. encourages its Participants and Visitors to review the policies of the external websites and pages that they visit. Adopt Inc. is not responsible for the content or practices adopted by such external sites and pages, which are merely provided for convenience and information purposes.

7. Access and Rectification

Participants may make requests for access and rectification in accordance with the law by communicating with Adopt Inc. in the manner prescribed herein.

Participants may also complete or change their "adoption request" by modifying their application form or their video. However, it will not be possible for Participants to modify the information contained in their "adoption request" once their application form is transmitted to Adopt Inc. The Participants must therefore ensure that their application is complete, exact and up to date before transmitting it.

8. Changes to this Privacy Policy

Adopt Inc. reserves the rights to modify this Privacy Policy from time to time. In the case of a substantial modification, Adopt Inc. will provide notification of such change to all Participants prior to the change taking effect via a banner notice on the Site or by any other means of communication. Thereafter, the updated Privacy Policy will be rendered available and easily accessible via this Site. Likewise, Adopt Inc. will post an updated version of this Privacy Policy every time a minor amendment is made. The Participants and Visitors will be able to know if the Privacy Policy has been updated by looking at the effective date which appears at the bottom of the Privacy Policy. Adopt Inc. recommends that Participants and Visitors periodically verify the Privacy Policy, since they will be deemed to have consented to the amended terms and conditions of such Privacy Policy if they keep accessing or using this Site after it has been modified. If a Participant or Visitor disagrees with the terms of such Privacy Policy, he must immediately cease accessing or using the Site.

9. Contacting Adopt Inc.

Adopt Inc. invites all Participants that have questions regarding the Program or their "adoption request" to consult the information made available on the Site. Given the large number of "adoption requests" to be assessed as part of the Program, the Participants should refrain for communicating with Adopt Inc. for inquiries about the ongoing treatment of their file during the process. Adopt Inc. will not provide Participants with any details before the process has been completed.

Moreover, Adopt Inc. invites all Participants to periodically consult its Site and any other social media used by Adopt Inc.: indeed, while the selected Participants will be contacted personally in order to be informed of their selection, all other Participants will be notified of the outcome of the (pre-selection and selection) process through a general notice posted on the Site and other social media platforms.

Finally, for any other questions or comments, Participants and Visitors are invited to communicate with Adopt Inc. at the following e-mail address : info@adopte-inc.com

Effective Date : June 1, 2016