Privacy Policy

Effective Date: 26 Apr. 25 Last Updated: 26 Apr. 25

Provisioni Surveillance Inc. Website: www.provisioni.com

Registered in: Edmonton, Alberta, Canada

1. Introduction

Provisioni Surveillance Inc. ("Provision i", "we", "us", or "our") is committed to maintaining the confidentiality, integrity, and security of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your data when you engage with our website, our remote surveillance services, or any affiliated services and systems.

This policy is drafted in accordance with the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and other applicable privacy laws in Canada. By accessing our website or using our services, you acknowledge that you have read and understood this policy and consent to the practices described herein.

2. Scope and Application

This Privacy Policy applies to:

- Visitors and users of our website (www.provisioni.com)
- Clients who engage Provision i for surveillance and security services
- Individuals whose personal information may be captured by Provision i surveillance systems
- Business partners and vendors interacting with our company

This policy does **not** apply to third-party websites linked from our site or to any third-party tools used outside our control.

3. Types of Information We Collect

Provision i collects both **personal information** and **non-identifying information**, including:

A. Personal Information (Collected with Consent)

• Full name, contact details (email, phone number)

- Business or property address
- Billing and payment information
- Identity verification (if required for access control systems)
- Correspondence or customer support interactions
- User login credentials for client portal access (if applicable)

B. Surveillance and System Data

- Video and audio recordings from cameras at client properties
- Motion, sound, or AI-triggered surveillance alerts
- Images, snapshots, timestamps, and real-time footage logs
- Access control logs, badge IDs, and GPS data (where applicable)

C. Website Usage Data (Automatically Collected)

- IP address and device information
- Browser type and version
- Pages visited and time spent
- Referring URLs
- · Cookies and other tracking technologies

4. Purposes for Collecting Personal Information

We collect and use personal information for the following legitimate purposes:

- To provide and manage surveillance and monitoring services
- To detect, investigate, and prevent unauthorized activity or criminal threats
- To send alerts, incident reports, and video evidence to authorized users
- To respond to inquiries and provide technical or customer support
- To comply with legal, regulatory, or contractual obligations
- To manage client accounts, billing, and service agreements
- To analyze and improve our technology, website, and service delivery
- To develop risk assessment reports or service optimization tools using AI

5. Legal Basis for Processing

Under PIPEDA and applicable privacy laws, Provision i collects and processes personal data based on the following legal grounds:

- **Consent** Voluntary provision of information by users or clients
- Contractual necessity To fulfill obligations under signed service agreements
- Legitimate interests Such as monitoring properties for safety or preventing crime
- **Legal obligations** To comply with applicable law enforcement requests or legal proceedings

6. Consent and Withdrawal

Where required by law, we seek explicit consent before collecting or using your personal data. You may withdraw your consent at any time by contacting us at **privacy@provisioni.com**, subject to legal and contractual restrictions.

Please note that withdrawing consent may impact our ability to provide certain services.

7. Disclosure of Information

Provision i does **not sell or rent** personal information to third parties. We may disclose your data under the following circumstances:

- To authorized employees, contractors, or agents who need access to deliver services
- To third-party vendors or partners under strict confidentiality agreements (e.g., payment processors, IT providers, remote monitoring personnel)
- To law enforcement or regulatory agencies when required by law, subpoena, or court order
- To insurance providers or legal representatives in the event of a claim or incident
- To new business owners in the event of a corporate merger, acquisition, or restructuring (with notice)

8. Data Storage and Security

We take commercially reasonable steps to protect personal information from unauthorized access, disclosure, alteration, or destruction. Security measures include:

- AES-encrypted video data storage
- Secure login portals with multi-factor authentication (MFA)
- Role-based access control for surveillance operators
- Firewalls, antivirus, and 24/7 system monitoring
- Regular penetration testing and compliance reviews
- Surveillance footage retention limited to necessary timeframes (e.g., 30–90 days unless otherwise required)

Client data is stored on secure servers located in Canada or jurisdictions with equivalent data protection laws.

9. Data Retention

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable law. Video and audio recordings are retained based on the contract and risk exposure timeline, then securely deleted.

You may request deletion of your personal data, subject to legal exceptions (e.g., ongoing investigations, litigation holds).

10. Cookies and Web Analytics

Our website uses cookies to enhance user experience, analyze site performance, and support security measures. You may disable cookies in your browser settings, but this may impact website functionality.

We may use third-party analytics tools (e.g., Google Analytics) to understand how users interact with our website. These tools do not collect identifiable personal information.

11. Access and Correction Rights

You have the right to:

- Request access to your personal information
- Request correction of inaccurate or outdated information
- Withdraw consent to the use of your information
- Request deletion or anonymization (where applicable)
- File a complaint with the Office of the Privacy Commissioner of Canada

To exercise any of these rights, please contact our Privacy Officer at **privacy@provisioni.com**.

12. International Data Transfers

Although we primarily store data in Canada, we may transfer personal data to third-party service providers located in other jurisdictions, including India, where our remote monitoring team may operate. These providers are contractually bound to maintain equivalent levels of data protection.

13. Children's Privacy

Our services are not directed at children under the age of 18. We do not knowingly collect or process personal data of minors. If we learn that we have inadvertently collected such information, we will delete it promptly.

14. Changes to This Policy

We reserve the right to amend this Privacy Policy at any time to reflect legal, regulatory, or operational changes. The updated version will be posted on our website with a revised "Last Updated" date. Continued use of our services constitutes your agreement to the updated policy.

15. Contact Information

If you have any questions, concerns, or complaints about this Privacy Policy or our privacy practices, please contact:

Privacy Officer

Provisioni Surveillance Inc. Email: privacy@provisioni.com

Phone: +1-825-556-4300 Website: <u>www.provisioni.com</u> Edmonton, Alberta, Canada