

Privacy Policy

GT.net

Address	GT.net 500 – 455 Granville Street Vancouver, BC Canada, V6C 1T1	Version	2.0
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This Privacy Policy describes the personal information handling practices of Gossamer Threads Inc. (GT) when providing products as well as services such as consulting, web development and other services, and outlines our continuing commitment to the protection of any personal information that we manage. This policy is based on the Canadian Standards Association *Model Code for the Protection of Personal Information* (CAN/CSA-Q830) as well as the criteria set forth in the Generally Accepted Privacy Principles (GAPP) and applies to information gathered on <https://www.gossamer-threads.com/>, gt.net and related websites (GT websites) .

The term “personal information”, as used in this Privacy Policy, means any information in any form about an identifiable individual, being a GT customer, prospect or any user of a GT product or website. This Policy does not apply to an individual's business contact information where collected, used or disclosed solely for the purpose of communicating with the individual in relation to their business, employment or profession. Personal information does not include anonymous or aggregate information that cannot be tracked back to you personally.

Note that any end user data stored on GT's servers in the context of using GT's managed hosting solutions is not covered by this Privacy Policy. Please visit the [GT Services Data Privacy Statement](#) for an explanation.

Principle 1: Accountability

GT ACCEPTS FULL RESPONSIBILITY FOR ANY PERSONAL INFORMATION UNDER OUR CONTROL. TOWARD THAT END, WE HAVE ESTABLISHED INTERNAL PROCEDURES TO COMPLY WITH THIS POLICY AND HAVE DESIGNATED A PRIVACY OFFICER TO BE ACCOUNTABLE FOR COMPLIANCE WITH THE FOLLOWING PRINCIPLES.

- 1.1. Responsibility for ensuring compliance with the provisions inherent in this policy rests with GT's Privacy Officer. The Privacy Officer may delegate responsibilities to one or more employees to act on his behalf.
- 1.2. GT shall use contractual and other commercially reasonable means to ensure that any third parties engaged provide a comparable level of protection if personal information is accessible by them.
- 1.3. To give effect to the principles of privacy, in addition to developing this policy, GT has established detailed procedures to manage privacy breaches.

Principle 2: Identifying Purposes

GT may collect personal information for specific purposes as outlined under this principle.

- 2.1. Personal information may include:

- Your name and contact information such as physical address, email addresses and telephone numbers;
- Information you provide to GT about your interests or needs;
- Past transactional behaviour and use of GT services;
- Limited financial information to process payments (see section 4.4 of this Policy).

2.2. GT collects personal information for the following purposes:

- a) to verify an individual's identity;
- b) to understand the needs of individuals and respond to your information requests;
- c) to provide the products and services expected by our customers;
- d) to establish relationships, provide quality service and support, as well as communicated about product updates, patches and fixes;
- e) to notify you about new product releases, service developments or other GT news;
- f) to process financial transactions; and
- g) to meet legal or regulatory requirements imposed upon GT from time to time.

2.3. Upon request, representatives of GT collecting personal information shall explain the purposes for which such information will be used, or refer the individual to another GT representative who can explain the purposes.

Principle 3: Obtaining Consent

GT obtains informed consent for the collection, use or disclosure of personal information, except where inappropriate.

- 3.1. Unless otherwise permitted or required by law, GT shall not use or disclose personal information for any new purpose that is not outlined in section 2.2 without first identifying and documenting the new purpose and obtaining the express consent of the individual.
- 3.2. Consent can be obtained in person, by phone, by mail, or via the Internet. Consent is only implied or assumed if it is obvious based on the individual's actions or inactions, and the personal information is non-sensitive in nature and context.
- 3.3. GT will only require individuals to consent to the collection, use or disclosure of personal information as a condition to the supply of a product or service if such collection, use or disclosure is required to fulfill the identified purposes.
- 3.4. In general terms, the continued use of products and services by a customer constitutes implied consent for GT to continue collecting, using and disclosing personal information for all identified purposes.

- 3.5. An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. For example, you are always given the ability to opt-out of receiving promotional messages from GT. GT will inform customers of the implications of withdrawing consent in any context, as we may be limited or unable to provide certain information, products or services then.

Principle 4: Limiting Collection

GT limits the collection of personal information to that which is necessary for purposes identified by GT. Personal information is collected by fair and lawful means.

- 4.1. For the most part, personal information collected by GT, as outlined in section 2.1, is collected directly from the individual who it is about, for example through our Hosting Services Order Form and other forms/supporting documentation provided by an individual.
- 4.2. Unless otherwise permitted or required by law, GT shall make reasonable efforts to only collect and use personal information that is necessary for the purposes identified in section 2.1.
- 4.3. Only with the authorization of the individual or where permitted or required by law, GT may also collect personal information from references, financial institutions, credit reporting agencies or other third parties.

Principle 5: Limiting Use, Disclosure and Retention

GT does not use or disclose personal information for purposes other than those for which it is collected, except with the consent of the individual or as required by law. GT retains personal information only as long as necessary for the fulfillment of those purposes, or as required by law.

- 5.1. GT may disclose personal information as follows:
- a) for the purpose of meeting legal, regulatory, industry self-regulatory, insurance or security requirements; in the context of a legal investigation or a request from law enforcement authorities; or for an external audit process;
 - b) to a person who, in the reasonable judgment of GT based on identification provided, is seeking the information as an agent of the individual;
 - c) with your explicit agreement, to GT's partners so that they may offer other products and services that may be of interest to you; and
 - d) for other purposes identified by GT, and agreed to by you.
- 5.2. Only GT's employees, agents, partners, subcontractors or service providers with a business-related need to know, or whose duties reasonably so require, are granted access to personal information.

- 5.3. GT may transfer personal information to subcontractors who may process or store such information outside of Canada on GT's behalf. Such information may be provided to law enforcement or national security authorities of that foreign jurisdiction upon request, in order to comply with foreign laws.
- 5.4. GT does not and will never sell any personal information to third parties for marketing or any other commercial purposes.
- 5.5. GT retains personal information only as long as it is deemed necessary, to fulfill the purposes identified in section 2.2 or as required by law. Personal information no longer necessary or relevant for the identified purposes or no longer required to be retained by law, shall be securely destroyed, erased or made anonymous.

Principle 6: Accuracy

GT makes reasonable efforts to keep personal information as accurate, complete and up-to-date as is necessary to fulfil the purposes for which the information is to be used.

- 6.1. GT relies upon the individuals who provide us with their personal information to ensure its accuracy and completeness.
- 6.2. GT has established internal procedures to preserve the integrity of the personal information received by individuals in accordance with reasonable commercial standards.
- 6.3. GT shall update personal information about customers as and when necessary to fulfill the identified purposes, or upon notification by the individual.

Principle 7: Security Safeguards

GT protects personal information with security safeguards appropriate to the sensitivity of the information.

- 7.1. With the use of appropriate security measures, GT protects personal information against a variety of risks, such as, loss, theft, unauthorized access, disclosure, copying, use, modification or destruction of such information.
- 7.2. Safeguards involve physical, organizational and technical measures including but not limited to:
 - Security card access to premises;
 - Restriction of employee access to files on a "need to know" basis;
 - Locking up personal information as necessary, such that it is not left unattended in plain view;

- Firewalls, anti-virus, strong passwords and software solutions for technical security (including ensuring that information is only collected on GT websites via a secure, 128-bit encrypted Secure Socket Layer session);
- Regular reviews of privacy compliance initiatives; and
- Various data security controls as outlined in GT's Security Policies.

7.3. All of GT's employees with access to personal information shall be required, as a condition of employment, to safeguard personal information viewed or handled by the employee. Employees sign confidentiality agreements and must complete security awareness training annually.

Principle 8: Openness

GT makes readily available specific information about its personal information management policies and practices to individuals upon request.

8.1. This information includes:

- a) the name, title and address of the Privacy Officer to whom inquiries or complaints can be forwarded;
- b) the means of gaining access to personal information held by GT;
- c) a description of the type of personal information held by GT, including a general account of its use and disclosure; and
- d) a copy of this policy, our security policies, our SOC2 compliance report, or other information that explains GT's information handling practices.

8.2. GT makes information available to help individuals exercise choices regarding the use and disclosure of their personal information upon request.

Principle 9: Individual Access

GT informs individuals of the existence, use and disclosure of his or her personal information upon request, and gives the individual access to that information. Individuals are given the opportunity to challenge the accuracy and completeness of their information and have it amended as appropriate.

9.1. Upon written request, GT will afford customers a reasonable opportunity to review their personal information as contained in GT's files, whether in electronic or in paper form.

- 9.2. Upon request, GT will provide an account of the use and disclosure of the individual's personal information and, where reasonably possible, will state the source of the information.
- 9.3. In order to safeguard personal information and prevent fraudulent access to personal information, we may take reasonable steps to verify an individual's identity before granting them with access to their file.
- 9.4. Requested information will be provided in a timely manner and in a form that is generally understandable. Individuals will be provided with any help needed to access their personal information, including clarifying exactly what they are looking for.
- 9.5. GT shall promptly correct or complete any personal information that is successfully demonstrated by the individual to be inaccurate or incomplete. Where appropriate, GT shall transmit to third parties having access to the personal information in question, any amended information.
- 9.6. An individual's right to access or correct personal information is subject to applicable legal restrictions. If GT must decline to provide an individual with access to their personal information, an explanation will be provided.

Principle 10: Challenging Compliance

An individual shall address a challenge concerning GT's compliance with the principles set out in this Privacy Policy or any applicable data protection laws to GT's Privacy Officer.

- 10.1. GT maintains procedures for addressing and responding to all inquiries and complaints by customers with regards to GT's handling of personal information.
- 10.2. Note that GT is located in Canada for which the European Commission has made a positive finding of adequacy. Personal information about an EU resident may be stored on a GT server provided that GT complies with the General Data Protection Regulation (EU 2016/679). GT has taken the necessary GDPR compliance steps.
- 10.3. All complaints concerning compliance with this Policy shall be investigated by GT in a timely manner. If a complaint is found to be justified, GT shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures.

Website Practices – Monitoring and Tracking

Usage Tracking

Our websites may automatically record some general information about your visit in order for GT to engage in web statistical analysis using Google Analytics. We want to make sure our sites are useful to visitors. This information may include the:

- Internet domain for your Internet service provider, such as “company.com” or “service.ca” and the IP address of the computer you are using to access GT websites;
- Type of browser you are using, such as Internet Explorer, Firefox or Chrome;
- Type of operating system you are using such as Windows or Macintosh;
- Date and time of the visit to our site, the pages of our site that were visited, and the address of the previous website you were visiting if you linked to us from another website
- Age category, gender, and affinity interests as determined by demographic and interest reports available through Google Analytics.

We make no effort to personally identify you based on your visit to our site. If you wish, you may opt out of being tracked by Google Analytics by disabling or refusing the cookies; by disabling JavaScript within your browser; or by using the [Google Analytics Opt-Out Browser Add-On](https://tools.google.com/dlpage/gaoptout?hl=en) (<https://tools.google.com/dlpage/gaoptout?hl=en>)

Data collected for web analytics purposes may be processed in any country where Google operates servers, and thus may be subject to the governing legislation of that country.

Cookies

We also use "cookies" to improve your experience on our website, to identify you as a return visitor, and to measure website activity. A cookie is a small text file that a website can send to your browser, which may then store the cookie on your hard drive. Cookies in and of themselves cannot be used to reveal your identity. Many browsers, however, allow you to disable cookie collection if you wish, or inform you when a cookie is being stored on your hard drive. If you refuse cookies, you may not be able to use certain features of our website.

Other Important Notes Regarding our Web Practices

External Links

GT websites may provide links to other websites which we believe may be of interest to you. GT is not responsible for the privacy practices of these other sites. We encourage you to read the privacy statements of each and every website that requests personal information from you.

Third Party Social Media

GT's use of social media serves as an extension of its presence on the Internet. Social media account(s) are

public and are not hosted on GT servers. Users who choose to interact with GT via social media should read the terms of service and privacy policies of these third-party platforms and those of any applications used to access them.

Special Notes for Parents

GT takes seriously its obligations under the *Children's Online Privacy Protection Act* concerning the collection of personal information from individuals under the age of thirteen (13). GT websites are not directed at children, and we request that children under the age of 13 not provide personal information through our sites.

Security

No method of transmitting or storing data is 100% secure. As a result, although we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us through or in connection with GT websites. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem in order for GT to resolve the issue in a timely manner. Also keep in mind that e-mail is not a secure form of communication so never send sensitive personal information to us via e-mail.

Privacy Officer Contact Information:

If you have any questions about this Privacy Policy, GT's privacy practices, or would like to access your personal information, please contact:

Privacy Officer
Gossamer Threads
5th Floor, 455 Granville St.
Vancouver, BC V6C 1T1
Canada
Phone: 604-687-5804
Email: privacyofficer@gt.net

** NOTE: WE cannot guarantee the security of e-mail communications over the Internet.*

Hours: Monday to Friday
9am to 5pm Pacific Time

Revisions to this Policy

We reserve the right to modify this Privacy Policy at any time. Revisions will be effective when posted on GT websites.