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REM PIPEDA Policy

REM Web Solutions Inc.
PIPEDA Policy
Effective Date: September 9, 2026

Purpose and Scope

REM Web Solutions Inc. ("REM") is committed to protecting personal information in our custody or under our control and to maintaining a privacy-management program consistent with the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and other applicable privacy requirements.

This Policy replaces REM's previous PIPEDA Policy dated March 26, 2020.

PIPEDA establishes ten fair-information principles governing accountability; identifying purposes; consent; limiting collection; limiting use, disclosure and retention; accuracy; safeguards; openness; individual access; and challenging compliance. REM has structured its privacy practices around these principles.

This Policy applies both to personal information REM collects for its **own commercial and business purposes** and to personal information REM **processes in providing websites, hosting, applications and related services to customers**.

Accountability

REM designates a **Privacy Officer** to oversee compliance with this Policy and applicable privacy requirements.

The Privacy Officer is responsible for overseeing REM's privacy-management practices; responding to privacy enquiries and complaints; coordinating access and correction requests; reviewing new or materially changed personal-information practices; coordinating privacy incidents and breach responses; and supporting employee privacy awareness.

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REM employees are expected to direct privacy questions or concerns to the Privacy Officer or the appropriate internal resource.

PIPEDA's accountability principle requires organisations to appoint someone responsible for privacy compliance and to maintain policies and practices governing the protection of personal information.

What Personal Information Does REM Collect?

REM may collect personal information directly in the regular course of doing business, including names, contact details, company or employment information, billing and account information, correspondence, customer-service information and information provided through REM website forms.
REM's website and systems may also process technical information, including IP addresses, browser and device details, referring information, pages visited, timestamps and information generated by cookies or similar technologies.

REM also provides website, hosting, ecommerce and custom web-application services through which customers may collect information from their own users. Depending on a customer's requirements, this may include information submitted through contact forms, enquiry forms, registrations, subscriptions, secure content, ecommerce transactions or other custom forms and applications.

REM seeks to collect or process only the information reasonably required for the relevant purpose.
Sensitive information requires a higher degree of care. REM customers are expected not to configure websites or forms to collect highly sensitive information without determining the appropriate legal, security and technical requirements in advance.

The OPC expects organisations to identify what personal information they hold, assess its sensitivity and adopt practices appropriate to that information.

How Does REM Collect Information?

REM may collect or process information through:

- REM's website and WebWiz@rd™ content-management technology;

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- Contact, quote, registration, newsletter, support and other content forms;
- Custom websites and web applications;
- Client Centre and other authenticated systems;
- Email, telephone and direct business communications;
- Server and security logs;
- Cookies and similar technologies;
- Analytics and tag-management technologies;
- Approved or customer-directed third-party services and integrations.

Why Does REM Collect or Process Information?

REM collects personal information for purposes including customer relationship management; responding to enquiries; sales and quotations; providing and supporting products and services; account administration; billing; website operation; website and system security; analytics and performance measurement; permitted marketing communications; and complying with legal or contractual requirements.

Where REM processes personal information through a website or application for a customer, the information is processed primarily for the business purposes established by that customer and to enable REM to provide the contracted website, application, hosting, maintenance or support service.
REM does not use customer-controlled end-user information for unrelated REM purposes.

Contact and Content Forms

REM websites and customer websites may collect personal information through **contact forms and other content forms**.

Form information may include names, email addresses, phone numbers, company information, addresses, the subject of an enquiry, comments, registration information or other fields required for the particular application.

For forms operated by REM for REM's own purposes, REM is responsible for identifying the purpose and obtaining the required consent.

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For forms created or hosted on behalf of a customer, the customer generally determines what information is requested and why it is required. The customer is responsible for ensuring that its collection, use and disclosure of the information is lawful, that appropriate privacy notices are provided and that required consent is obtained, except where REM has expressly agreed in writing to perform a particular compliance function on the customer's behalf.

REM may receive, transmit, store or access information submitted through a customer form where necessary to host the website, operate the relevant functionality, provide maintenance or support, troubleshoot an issue or perform other contracted services.

This allocation of responsibilities does not eliminate REM's obligation to appropriately safeguard personal information while it is being handled within REM's service environment. The OPC's accountability guidance states that organisations remain accountable for information under their control, including information transferred to third parties for processing.

Where Does REM Keep Personal Information?

Depending on the service, personal information may be stored within REM-managed infrastructure, databases used by REM applications, backup systems and approved third-party systems required to provide the applicable service.

Custom website and application information may be stored in database technologies including Databases or other systems appropriate to the application.

REM no longer describes all personal information as necessarily being stored in a single technology or location because modern website services can involve multiple systems and service providers.

Where information is processed by a third-party service provider outside Canada, REM will consider the nature of the information, the provider and the applicable privacy and contractual requirements. The OPC expects organisations to assess risks, use contractual or other measures to establish comparable protection, restrict providers to the contracted purpose and be transparent about processing outside Canada.

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Who Has Access to Personal Information?

REM limits internal access to personal information to personnel who reasonably require it to perform their responsibilities.

Depending on the service, this may include authorised members of REM's development, IT, support, administration, sales or management teams.

REM customers may have access to information collected through their own websites or applications using the functionality provided for that purpose.

Approved third-party service providers may process information where required to deliver a service or integration.

Access is to be proportionate to the business requirement and sensitivity of the information.

Who Does REM Share Information With?

REM may disclose or transfer personal information to third-party providers where reasonably required for an identified purpose or to provide a requested service.

Examples may include payment processors, email or newsletter providers, analytics providers, cloud or infrastructure providers, CAPTCHA or security services, mapping providers, shipping or fulfilment services, customer relationship management systems, advertising platforms, APIs and other customer-requested integrations.

Only information reasonably required for the applicable purpose should be provided.

REM may also disclose information where required or permitted by law, in response to lawful authority, to investigate fraud or security incidents, or in connection with a business transaction where legally permitted and appropriate safeguards are used.

Third-Party Service Providers and Integrations

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REM may implement, configure or connect websites and applications with third-party software, services, APIs, plug-ins, widgets, payment services, analytics platforms, advertising platforms, social networks or other external technologies.

When REM selects a provider to process personal information under REM's control, REM will take reasonable measures appropriate to the nature and sensitivity of the information to evaluate the provider and establish suitable privacy and security protections.

Where personal information is transferred to a third party for processing, REM will apply contractual or other protections appropriate to the circumstances and will limit the third party's authorised use of the information to the applicable service purpose. This reflects PIPEDA's accountability requirements.

A REM customer may also direct REM to implement or connect to a third-party service selected by the customer. The customer is responsible for evaluating whether its proposed use of that service is suitable for its business, users, information and legal requirements, unless REM has expressly agreed in writing to perform that evaluation.

Third-party tools are operated independently from REM and may change their technology, APIs, functionality, security requirements, privacy practices, terms, or availability without REM's control.

Identifying Purposes

REM identifies the purpose for collecting personal information at or before the time the information is collected, except where otherwise permitted by law.

For REM's own website, purposes are communicated through the Privacy Policy, relevant forms, notices or other communications.

For customer applications, REM works with the customer during planning and implementation to determine the data fields and functionality needed by the customer's business requirements. The customer remains responsible for determining whether its proposed collection and use are appropriate and lawful.

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REM will not intentionally use personal information for a materially new purpose without determining whether additional notice or consent is required.

PIPEDA requires collection, use and disclosure to be for purposes that a reasonable person would consider appropriate in the circumstances.

Consent

REM obtains meaningful consent where consent is required for the collection, use or disclosure of personal information.

The form of consent depends on the circumstances, including the sensitivity of the information, the reasonable expectations of the individual and the potential consequences of the processing.
Express consent will generally be used where the information is sensitive, the purpose is outside the individual's reasonable expectations, or the processing creates a meaningful residual risk of significant harm. Implied consent may be appropriate in more limited circumstances involving less sensitive information and purposes that are reasonably expected.

Individuals may withdraw consent, subject to legal or contractual restrictions and reasonable notice. REM will explain significant consequences of withdrawal where applicable.

For customer websites and applications, the REM customer is generally responsible for obtaining consent from its users for the customer's purposes. REM may provide the technical mechanism used to request or record consent but does not assume responsibility for determining the customer's lawful purpose or required form of consent unless that responsibility has been expressly included in REM's services.

Where REM provides a technical consent-recording mechanism, the system should, where appropriate to the implementation, maintain information sufficient to demonstrate the consent context, such as the date or time, applicable notice or version, and the preference or choice recorded.

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A database record-creation timestamp alone should not be treated as proof of all elements of meaningful consent because meaningful consent requires an individual to understand the information, purpose, sharing and relevant consequences involved.

Cookies, Analytics and Online Tracking

REM websites may use cookies and similar technologies for functionality, security, analytics, advertising and other identified purposes.

PIPEDA does not establish a blanket rule that every website analytics technology must use exactly the same form of consent. REM evaluates the appropriate consent treatment based on whether personal information is involved, sensitivity, reasonable expectations, the purpose of the technology and applicable jurisdictional requirements. The OPC states that consent may be express or implied depending on those circumstances, although express consent is generally expected for sensitive, unexpected or materially risky processing.

Online behavioural advertising and cross-site tracking receive additional scrutiny because persistent identifiers can be combined with IP addresses, browsing history, search terms, form information and other data to construct profiles.

REM may use Google Tag Manager to manage website tags. Google states that GTM itself does not, apart from standard HTTP logs and diagnostic data, collect or retain visitor information such as pages visited; however, individual tags deployed through GTM may independently collect information.

Where Google Analytics (GA) is used, REM seeks to configure analytics so that directly identifying information such as names, email addresses, phone numbers and the contents of website forms is not intentionally transmitted as analytics data. GA nevertheless uses pseudonymous identifiers and first-party cookies where analytics storage is enabled, so REM does not characterise all analytics information as inherently anonymous.

REM may use consent-management functionality to enable, disable or alter the behaviour of analytics and advertising technologies according to the visitor's preferences and applicable privacy requirements. Google Consent Mode, for example, supports

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separate consent states for analytics storage, advertising storage, advertising user data and advertising personalisation.

Limiting Collection

REM limits the collection of personal information to information that is reasonably necessary for the identified purpose.

REM does not intentionally request additional personal information merely because a website or technical system is capable of collecting it.

For customer applications, REM works from the customer's stated business requirements. Customers are expected to limit the form fields, data elements and integrations they request to those reasonably required for their legitimate purposes.

Limiting Use, Disclosure and Retention

REM uses and discloses personal information only for the identified purpose, reasonably related purposes, purposes authorised by consent, or as otherwise permitted or required by law.

REM limits access to authorised personnel and providers with a legitimate requirement for the information.

Personal information is retained only for as long as reasonably necessary for the identified purpose or to satisfy business, contractual, security or legal requirements. Information may remain temporarily in backups or disaster-recovery systems after removal from an active production system and will be managed according to REM's applicable backup and retention practices.

For customer-controlled information, retention may also be governed by the customer agreement and customer instructions.

At the end of the applicable retention period, information will be securely deleted, destroyed or anonymized as appropriate.

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This replaces the previous policy's absolute statement that all customer information is destroyed immediately when a website is taken offline, because appropriate retention needs to account for backup cycles, security requirements and legal or contractual obligations.

Accuracy

REM takes reasonable steps to maintain the accuracy, completeness and currency of personal information where those qualities are necessary for the purposes for which the information is used.
Individuals may request correction of personal information under REM's control.

Where information is controlled by a REM customer, REM may direct the individual to that customer or assist the customer with a correction request.

Safeguards

REM uses physical, administrative and technical safeguards appropriate to the sensitivity, amount, distribution, format and storage of the personal information being protected.

Safeguards may include access controls, authentication, encrypted communications, restricted administrative access, network and database security measures, backups, monitoring, employee practices, confidentiality requirements and incident-response procedures.

Access to personal information is restricted to individuals and systems with a legitimate requirement for that access.

Security controls are reviewed and adjusted as systems, risks and technologies change. PIPEDA requires security measures to be appropriate to the sensitivity of the information being protected, and the OPC recommends privacy-impact and threat assessments for new or changing technologies.

Privacy Breaches and Incident Management

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Suspected loss, unauthorised access, unauthorised disclosure or other compromise of personal information is to be promptly reported internally and investigated.

REM will take reasonable steps to contain the incident, determine what information and individuals may be affected, identify the cause, assess the risk of harm and implement corrective action.

Where a breach of security safeguards involving personal information under REM's control creates a **real risk of significant harm**, REM will meet applicable PIPEDA reporting and notification requirements. Relevant factors include the sensitivity of the information and the probability that it has been or will be misused.

When the threshold is met, PIPEDA requires reporting to the Office of the Privacy Commissioner of Canada and notification of affected individuals as soon as feasible.

REM will maintain a record of **every breach of security safeguards involving personal information under its control for at least 24 months** after determining that the breach occurred, as required by the Breach of Security Safeguards Regulations.

Where REM becomes aware of an incident involving information it processes on behalf of a customer, REM will notify and cooperate with the relevant customer as appropriate to the circumstances and contractual relationship so that the organisation with control of the affected information can fulfil its obligations.

Risk Assessment

REM reviews privacy and security risk as appropriate when there are material changes to:

- Electronic or hosting infrastructure;
- Systems or applications that collect or process personal information;
- Third-party service providers or integrations;
- Types or sensitivity of information being processed;
- Business processes or personnel access; or
- Known threats, incidents or system failures.

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The OPC recommends privacy-impact assessment and threat analysis for ongoing activities, new initiatives and new technologies involving personal information.

Employee Awareness and Training

REM provides employees with privacy and security information appropriate to their responsibilities.
Employees with access to personal information are expected to understand the need to restrict collection, access, use and disclosure to legitimate business purposes and to escalate privacy requests and suspected incidents to the appropriate internal resource.

The OPC identifies employee privacy training as an expected component of an organisation's privacy-management program.

Openness

REM makes information about its privacy practices available through its website, this PIPEDA Policy and its website Privacy Policy.

Individuals may contact REM's Privacy Officer with questions about what personal information REM holds, the purposes for which it is used, the organisations or types of organisations to which it may be disclosed, and REM's privacy-management practices.

Individual Access and Correction

An individual may submit a written request to REM for access to personal information about that individual that is under REM's control.

REM may need to verify the requester's identity before providing personal information.

REM will respond as quickly as reasonably possible and ordinarily no later than **30 days after receiving the request**, subject to exceptions and extensions permitted by PIPEDA. In qualifying circumstances, PIPEDA permits an extension of up to an additional 30 days and requires notice to the requester.
Where appropriate, an individual may request correction of information that is inaccurate or incomplete.

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Access may be limited or refused where required or permitted by law. Where access is refused, REM will provide the reasons and available recourse where required.

For personal information collected through a customer's website or application and controlled by that customer, the individual should ordinarily submit the request to the customer. REM will provide reasonable assistance to its customer in responding to valid access, correction or deletion requests where the relevant information is processed within REM's systems.

Challenging Compliance

Individuals may raise questions, concerns or complaints about REM's compliance with this Policy or PIPEDA by contacting the REM Privacy Officer.

REM will investigate complaints and take appropriate corrective action where a complaint is found to be justified.

Individuals who are not satisfied with REM's response may have the right to submit a complaint to the **Office of the Privacy Commissioner of Canada**.

Privacy Officer Contact Information
Privacy enquiries should be directed to:
Privacy Officer
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72 St. Leger Street, Unit 2
Kitchener, Ontario N2H 6R4
Canada
Email: **support@remwebsolutions.com**
Telephone: **519-884-4111**
Toll-Free: **1-866-754-4111**

The current REM website confirms this business address, telephone number and support contact.

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Policy Review

REM will periodically review this Policy and its privacy-management program to account for changes to legislation, technology, services, information-handling practices and business operations.
The OPC recommends that organisations regularly review their privacy-management programs and address identified shortcomings.