

## 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. 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 analysing 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 reorganisation.
- **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, reorganisation, 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 authorised 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 analysing 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 reorganisation.
- **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 analyse 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-	What info is shared with or collected by this partner	Partner’s purpose	Link to Partner’s privacy policy
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Party Partner			
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. What device and usage data we process?

We use common information-gathering tools, such as log files, cookies, web beacons, device identifiers and similar technologies to automatically collect information, which may contain Personal Data, from your computer or mobile device as you navigate our websites or interact with emails and other messages we send you.

### 5.1 Non-Personally Identifying Information and Log Files

As is true of most websites, we gather certain other non-personally identifying information ("Non-PII") automatically via log files. This collected Non-PII may include your Internet Protocol (IP) address (or proxy server), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. This Non-PII is used to analyse overall trends, to help us provide and improve our websites and to guarantee their security and continued proper functioning. We may also collect IP addresses from users when they log into the services as part of the Company's security features.

### 5.2 Cookies, web beacons and other tracking technologies

We use cookies and similar technologies such as web beacons, tags and JavaScript alone or in conjunction with cookies to compile information about usage of our websites and interaction with emails from us.

When you visit our Sites, our servers or an authorised third party may place a cookie on your browser, which can collect information, including Personal Data, about your online activities over time and across different sites. Cookies allow us to track overall usage, determine areas that you prefer, make your usage easier by recognising you and providing you with a customised experience.

We may use both session-based and persistent cookies. Session cookies exist only during one session and disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our websites or services. To opt-out of tracking by Third Party Analytics Providers, please use the specific opt-out mechanism as indicated further below.

We may also use web beacons on our Sites and other electronic marketing. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to one of our websites. Such tracking technologies are used to operate and improve our websites and digital communications and track the clicking of links or opening of messages.

The Third Party Analytics Providers in the table in Section 4.2 are the third party vendors with whom we partner to place advertisements across the internet.

As described above, we or third parties may place or recognise a web beacon or unique cookie on your browser when you visit our Sites for the purposes of serving you targeted advertising (also referred to as “online behavioral advertising” or “interest-based advertising”). To learn more about targeted advertising, advertising networks and your ability to opt out of collection by certain third parties, please visit the opt-out pages of the Network Advertising Initiative, [here](#), and the Digital Advertising Alliance, [here](#).

To manage the use of targeting or advertising cookies on this website, consult your individual browser settings for cookies. To learn how to manage privacy and storage settings for Flash cookies [click here](#). Various browsers may offer their own management tools for removing HTML5 local storage.

### **5.3 Opt-Out from the collection of device and usage data**

You may opt-out from the collection of some device and usage data (see “What device and usage data we process” section above) by managing your cookies at the individual browser level. In addition, if you wish to opt-out of interest-based advertising click [here](#), or if located in the European Union click [here](#)). Please note, however, that by blocking or deleting cookies and similar technologies used on our websites, you may not be able to take full advantage of the website.

While some internet browsers offer a “do not track” or “DNT” option that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard that has been adopted by industry groups, technology companies or regulators. Therefore, we do not currently commit to responding to browsers’ DNT signals with respect to our websites. In other words, we do not alter our practices with respect to the collection of information based upon a user’s selection of the DNT setting or other opt out setting. If a person selects DNT we record and maintain their preferences. VIQ takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

#### **5.4 Social Media Features**

Our websites may use social media features or plugins, such as the Facebook “like” button, the Twitter “Tweet” button and other sharing widgets (“Social Media Features”). You may be given the option by such Social Media Features to post information about your activities on a website to a profile page of yours that is provided by a third-party social media network in order to share with others within your network. Social Media Features are either hosted by the respective social media network or hosted directly on our website. To the extent the Social Media Features are hosted by the respective social media networks, the latter may receive information that you have visited our website from your IP address. If you are logged into your social media account, it is possible that the respective social media network can link your visit of our websites with your social media profile.

Your interactions with Social Media Features are governed by the privacy policies of the companies providing the relevant Social Media Features.

#### **5.5 Notice to California Residents**

If you are a resident of California, California Civil Code Section 1796.83 permits you to request information regarding the disclosure of your personal information by VIQ to a third party for the third party’s direct marketing purposes. The right granted to California residents applies only to their activities within the State of California. To make such a request, please send an email to [legal@viqsolutions.com](mailto:legal@viqsolutions.com) or write us at:

VIQ Solutions Inc.  
5915 Airport Road, Suite 700  
Mississauga, ON, Canada  
L4V 1T1  
Attn: Legal Department

#### **6. 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 analyse 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 analyse 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.

## **7. 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.

## 8. 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 unauthorised 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.

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

### 9.1 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.

### 9.2 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, organisation’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.

### **9.3 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.

### **9.4 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.

## **10. Security**

We take precautions including organisational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorised 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.

**11. European Union And Swiss Privacy Shield Framework Statement – THIS SECTION APPLIES ONLY TO CUSTOMERS OF VIQ MEDIA TRANSCRIPTION, INC. (“VIQ MEDIA”)**

For personal information of employees, consumers, healthcare professionals, medical research subjects and investigators, customers, investors, and government officials that VIQ Media receives from the European Economic Area or Switzerland, VIQ Media has committed to handling such personal information in accordance with the EU and Swiss - U.S. Privacy Shield Framework. VIQ Media’s EU and Swiss -U.S. Privacy Shield Framework certification can be found at <https://www.privacyshield.gov/list>. For more information about the Privacy Shield Principles, please visit the U.S. Department of Commerce's Website at <https://www.privacyshield.gov/>.

VIQ Media complies with the US-EU and US-Swiss Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from European Union member countries and Switzerland. VIQ Media has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity, purpose limitation, access, and recourse, enforcement and liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

VIQ Media acknowledges that EU and Swiss individuals have the right to access their personal data for the purpose of inspection, correction, deletion, or limitation of use. Individuals wishing to review the personal data we hold may do so by contacting [legal@vqsolutions.com](mailto:legal@vqsolutions.com). In compliance with the US-EU and US-Swiss Privacy Shield Principles, VIQ Media commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss citizens with inquiries or complaints regarding this privacy policy should first contact VIQ Media as set forth in this privacy policy. VIQ Media will refer unresolved privacy complaints of EU and Swiss individuals under the US-EU and US-Swiss Privacy Shield Principles to an independent dispute resolution mechanism, the American Arbitration Association. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://go.adr.org/privacyshield.html> for more information and to file a complaint. Privacy Shield Framework requires us to provide notice that an individual has the possibility, under certain conditions, to invoke binding arbitration before a Privacy Shield Panel for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For additional information: <https://www.privacyshield.gov>. The Federal Trade Commission has jurisdiction with enforcement authority over VIQ Media’s compliance with the Privacy Shield.

**12. 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.

### **13. 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.