

## Privacy Policy

Protecting your privacy is important to WATERSHED HR Support and its management (collectively, “WATERSHED” “we” or “us”). This Policy explains how WATERSHED collects, uses and discloses personal information concerning its clients and other individuals (“you”), other than WATERSHED’s professionals, employees and agents.

Any personal information you provide to us will be treated with care and, subject to this Policy and applicable law, will not be used or disclosed in a way to which you have not consented. Our professionals, employees and agents are also subject to professional and ethical obligations relating to the confidentiality of information WATERSHED receives in the context of providing HR services.

By submitting your personal information to WATERSHED, you signify your consent to the collection, use and disclosure of your personal information in accordance with this Policy. If you do not consent to the collection, use and disclosure of your personal information in accordance with this Policy, please do not provide any personal information to WATERSHED. Of course, certain services can only be offered to you if you provide personal information to WATERSHED, and therefore WATERSHED may not be able to offer you those services if you choose not to provide us with required personal information.

**Personal Information** — The term “personal information” refers to any information about an identifiable individual or any information that allows an individual to be identified. In general, personal information does not include business contact information, such as your name, title or position, business address, business telephone or fax number in your capacity as an employee of an organization. During your relationship with WATERSHED, you may be asked to provide certain personal information concerning you and/or other individuals (such as witnesses, family members, adverse parties, employees, directors, officers, shareholders, investors, business partners, customers, etc.). Examples of such information include name, date of birth, home address, financial and credit information, billing and account information and other information relating to the provision of legal services by WATERSHED.

**Purposes for which Personal Information is Collected** — WATERSHED collects, uses and discloses personal information for the purposes identified at the time of collection, or as otherwise permitted or required by applicable law, including for the following purposes:

- to provide human resources and other related services;
- to comply with our professional obligations, including the rules regarding client identification and verification;
- to establish and manage client relationships, including considering whether to establish such a relationship;
- administrative, management and business purposes, such as to issue invoices, administer accounts, collect and process payments, evaluate credit standing, fulfill contractual obligations, and audit our business operations;
- to develop our knowledge management systems and databases;
- to distribute WATERSHED publications, invitations to seminars and events and other communications which WATERSHED believes may be of interest to clients and other individuals;
- to contact and communicate with clients and other individuals for the purpose of conducting market research, and evaluating client service and satisfaction;

- for any other purpose for which we have your consent.

**Limiting Collection, Use and Disclosure** — We strive to limit the amount of personal information we collect to that necessary and appropriate for the identified purposes. We will not use or disclose your personal information for purposes other than those for which it was collected, except with your consent or as permitted or required by applicable law.

**Consent** — To the extent possible, we will obtain consent to collect, use and disclose personal information about an individual directly from such individual. However, if you provide personal information concerning another individual to WATERSHED, you represent that, prior to submitting such information, you have obtained the necessary consent or authority to permit us to collect, use and disclose such personal information for the purposes set out in this Policy, or the collection, use and disclosure is permitted by applicable law.

WATERSHED will not collect, use or disclose personal information without the consent of the individual(s) concerned unless we are permitted or required to do so by applicable law. We generally do not obtain the consent of the individual(s) concerned in the following circumstances:

- if a client provides personal information about a third person to us for purposes of our providing services to a client;
- if legal, medical or security reasons make it impossible or impractical to seek consent; and
- when information is being collected for the detection and prevention of fraud or for law enforcement and seeking the consent of the individual may defeat the purpose of collecting the information.

**Withdrawal of Consent/Opting-Out** — In some jurisdictions, you may withdraw your consent to the use and disclosure of your personal information, or opt-out of certain uses and disclosures, to do that, please contact Steven Mendelsohn

**Disclosure of Your Personal Information** — WATERSHED may disclose your personal information to a government or regulatory entity that has asserted its lawful authority to obtain the information or where WATERSHED has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to protect WATERSHED's rights and property. If WATERSHED is involved in a merger or other reorganization, WATERSHED may disclose your personal information to the resulting organization.

WATERSHED may also disclose personal information as otherwise required or permitted by applicable law.

WATERSHED does not sell or exchange for consideration any personal information it holds.