

# Pluto Micro Business Personal Information Protection Policy

Last Updated: July 16, 2020

Pluto Micro Business Inc (Pluto Micro) is committed to safeguarding the personal information entrusted to us by our customers. We manage personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting customer and personal information.

## What is personal information?

Personal information means information about an identifiable individual. This may include an individual's name, email address, home address, and phone number.

## What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our customers, including, but not limited to, the information needed to:

- open and manage an account
- enroll a customer in a subscription service
- deliver requested products and services
- contact customer about appointments
- follow up with clients to determine satisfaction with products and services
- notify customers of upcoming events of interest
- notify customers of new or changed service offerings

We normally collect personal information directly from our customers. We may collect information from other persons within our customers' organization.

## Usage Data

We may also collect information with regards to how our services are being accessed and used ("Usage Data"). This Usage Data may include information such as a computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service visited, the time and date of a visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our services and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to a web browser from a website and stored on end user devices.

## Service Providers

We employ third party service providers, in Canada, the United States, and the United Kingdom to facilitate our services.

## Use of Information Outside of Alberta

Customer information may be transferred to — and maintained on — computers located outside of Alberta and Canada where the data protection laws may differ than those from Alberta. Pluto Micro makes reasonable efforts to ensure our service providers Outside of Alberta and Canada maintain the security of customer and personal information.

## How do we use and disclose personal information?

We use and disclose customer personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use client contact information to deliver goods. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

## How do we safeguard personal information?

We protect customer personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

## Consent

Consent to this policy, unless otherwise specified by a customer, is implied when our customers voluntarily share customer and personal information verbally, via a web form, or via email, or in any other manner.

## Questions and complaints

This policy will be shared with customers upon request. Any questions or concerns regarding this policy, or any privacy matter, may be emailed to [privacy@plutomicro.com](mailto:privacy@plutomicro.com).