



INTEGRITY ADVOCATE PRIVACY POLICY

Last modified: July 10, 2025

I. Introduction

Integrity Advocate Inc. ("**Company**", "**we**" or "**us**") respects your privacy and we are committed to protecting it by complying with this policy. This policy is designed to ensure compliance with the *Canadian Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5, the *California Consumer Privacy Act* of 2018, and where applicable, the European Union General Data Protection Regulation (GDPR), Regulation (EU) 2016/679.

This policy describes:

- How we collect, use, disclose, and protect the personal information of our customers and users of our proctoring services ("**you**").
- Describes the types of information we may collect from you or that you may provide when you engage with our identity verification, participation monitoring and proctoring services (our "**Services**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy legislation generally defines "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

This policy applies to information we collect, use, or disclose about you:

- When you use our proctoring services.
- In email and other electronic messages between you and us.

Before engaging with our Services, you will be given an opportunity to review our Privacy Statement and this Privacy Policy and you will be asked to consent to providing your personal information in compliance with this Policy. If you do not consent, you will not be able to continue to the next steps of the process as the collection, and verification and monitoring of your identity is at the core of our Services.

II. Information we collect about you

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to identify you, such as your name, e-mail address, Internet protocol (IP) address used to connect your computer to the Internet, still picture of you taken at the identity verification step, recording or images taken during proctored session, audio recording taken during proctored session, institution ID number, and government or institution issued identity card ("**personal information**"). For the purposes of the *California Consumer Privacy Act* of 2018 ("CCPA"), this information is in Category A (Identifiers), Category B (Personal information listed in the California Customer Records statute (Cal. Civ. Code s.1798.80(e)), Category F (Internet or other similar network activity) and Category J (Non-public education information (per the Family and Education Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).
- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information.
- **Technical information**, including your browser type and version, screen resolution, language setting, time zone setting, browser plug-in types and versions, operating system and platform, mobile network or information about your internet connection, the equipment you use to access our Services, and usage details including the length of your proctoring session and how many attempts were needed to pass your exam or test. For the purposes of CCPA, this information is in Category F.
- We do not collect information in Categories C (Protected Classification under California or US Federal law), D (Commercial information), E (Biometric information), G (Geolocation data), H (Sensory data), I (Professional or employment-related information) and K (Inferences drawn from other personal information) under CCPA.

III. How we collect information about you

We use different methods to collect your information, including through:

1. **Direct interactions with you when you engage with our proctoring service**, including your user information from the Learning Management System, your user ID, pictures and videos from proctoring session obtained via your webcam, audio from the proctoring session obtained via your microphone, screen captures from the proctoring session obtained via device screen share, and information from the browser, as applicable.

The information we collect directly from you through your engagement with our Services may include:

- Information that you provide when you register to use our Services, and information that is captured during the identity verification process and during the monitoring or proctoring session. We may also ask you for information if you report a problem with our Service.
 - Records and copies of your correspondence (including email addresses), if you contact us.
2. **Automated technologies or interactions**, including things like information about your computer and internet connection, your IP address, operating system and browser type, which is technical data and does not include personal information. Some elements central to your identity verification also happen automatically with the use of your webcam and microphone.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies)**. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser or declining the option when asked.
- **Web Beacons**. While our proctoring services do not use web beacons, some pages of our website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- **Embedded Scripts** – Our Service is an online proctoring product that is designed to make sure the right person is taking the training and paying attention as needed. For example, our embedded scripts will check if your face matches recent attempts for your email address at the same Institution and then skip ID verification if it does. We also use embedded scripts after page load to optimize performance.

Third Party Use of Tracking Technologies

Some content or applications on our website are served by third parties, such as Google Analytics. These third parties use embedded scripts to collect information about you when you access our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the website.

IV. How we use your information

We will never sell your personal information to anyone. We use the information that we collect about you or that you provide to us:

- To provide the necessary identity verification, participation monitoring and proctoring services that you request from us.
- To provide you with notices about your proctoring sessions and status.
- To present our website and its contents to you.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Services.
- To improve our Services, website, products or customer relationships and experiences.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

V. Disclosure of your information

We will never sell or willingly disclose your personal information to any third party who would stand to financially gain from it. Your personal information is never shared with third parties for the purposes of direct marketing.

We disclose personal information that we collect or you provide as described in this privacy policy:

- As part of the Services we provide, to the Institutions engaging us. Where an online course/exam provider or their agent is responsible for maintaining compliance with testing standards, limited information received by Integrity Advocate may be accessed or used by these parties solely as the basis for evaluating potential rule violations.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Integrity Advocate's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Integrity Advocate about our customers and users is among the assets transferred.



- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Integrity Advocate, our customers, or others.

VI. Storing, processing and transferring your personal information

We process and store your personal information on AWS Central servers in Montreal, Canada. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

If you are located in Australia, your personal information will be stored on our AWS Asia Pacific servers located in Sydney, Australia, and in our main Montreal, Canada location.

If you are located outside of Canada or Australia, please be aware that any information you provide to us will be transferred to Canada where the privacy laws may not be as protective as those in your country of origin. Integrity Advocate has taken steps to ensure compliance with the strictest privacy protections, including laws applicable in the European Union. If you are located outside the Canada and choose to use the Services, you consent to any transfer and processing of your personal information in accordance with this Privacy Policy, and you do so at your own risk.

We transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

VII. Data security

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers.

Your personal information is stored on secure servers in Canada that are protected by secure VPN. All data at rest is encrypted using KMS keys and all data in transit is secured using TSL/SSL certificates.

Integrity Advocate maintains internal policies to ensure the distribution of any information through the Internet, computer-based services, e-mail, and messaging systems is subject to scrutiny and sufficiently protected and addressed. In the event of a security breach, you would be notified as soon as possible by email. The notification would include all the information listed below or as the information becomes available/ known:

- the nature of the information that was breached (type and data of the information, name(s) of the person(s) whose information is impacted
- when the breach occurred
- how the breach occurred
- who was responsible for the breach
- what steps have been taken to mitigate the matter, and
- what measures have been taken to prevent reoccurrence.

VIII. Data retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We maintain specific and separate retention periods for each type of personal information that is collected through the identity verification stage and the proctoring session. We continually review these retention periods to ensure they are no longer than is necessary to provide the Services, and they are aligned with your requests and best practices in privacy law.

IX. Choices about how we use and disclose your information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Positive Consent:** You will be asked to consent to providing your personal information before engaging with our Services. If you do not consent, you will not be able to use our Services.
- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly.



X. Accessing and correcting your personal information

Users of our Service do not have a formal personal account with Integrity Advocate, and we collect only session-related user data. It is important that the personal information we hold about users of our Service is accurate and current. By law you have the right to request access to and to correct the personal information that we hold about you. You also have the right to request that we erase your personal information, the right to object to our processing of your personal information, and the right to request that we transfer the data we have collected to another organization or directly to you, under certain conditions.

If you want to review, verify, correct, request anonymization or withdraw consent to the use of your personal information, or exercise any of your rights regarding your personal information, you may send us an email at privacy@integrityadvocate.com or connect via chat support. Before we can delete a user's personal information, we must confirm with their Institution that the information is no longer needed for the purposes of using the Service. We will do our best to respond to these requests within 2 business days. Institution Clients can reach out directly to their Account Manager to request a larger scale deletion of data.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Please send all requests relating to your personal information to privacy@integrityadvocate.com.

We will not discriminate against you for exercising any of your privacy rights.

XI. Withdrawing your consent

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at privacy@integrityadvocate.com. Please note that if you withdraw your consent, we may not be able to provide you with the Service. We will explain the impact to you at the time to help you with your decision.

XII. Children under the age of 13

Our Service is not intended for children under 13 years of age. No one under age 13 may provide any information to the Service. We do not knowingly collect personal information from children under 13. If you are under 13, do not provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@integrityadvocate.com.

If you are in the EU, the minimum age for engaging with our service is 16 years of age.

XIII. Changes to our privacy policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on our website home page located at <https://integrityadvocate.com/>.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our website and this privacy policy to check for any changes.

XIII. Contact information and challenging compliance

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact our Data Protection Officer at privacy@integrityadvocate.com:

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Data Protection Officer using the contact information listed above.

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