

## **AdaptX Corporation — Privacy Policy (PIPEDA-aware)**

**Effective January 1, 2025**

**Contact:** [privacy@adaptx.ca](mailto:privacy@adaptx.ca) • +1-800-783-5266

This Privacy Policy explains how AdaptX Corporation (“**AdaptX**”, “**we**”) collects, uses, discloses, and protects **personal information** in connection with our website, client portal, and services (software, IT, hosting, VOIP management, and support). We follow the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and substantially similar provincial laws, where applicable.

### **1) Personal Information We Collect**

- **Account & Billing.** Business contact details, account identifiers, billing addresses, payment metadata (card and bank data are handled by our payment processor).
- **Service Data.** Website/app content you provide; configuration data; support tickets; server/application/security logs; VOIP metadata (e.g., numbers dialed/received, time, duration, routing) when we administer VOIP for you.
- **Usage & Device.** IP address, device/browser details, pages viewed, cookies and similar technologies.
- **Communications.** Emails, chats, and (where permitted) recorded support calls.

### **2) Purposes & Legal Bases**

We use personal information to:

- Provide and support services (contract performance).
- Set up and maintain accounts, billing, fraud prevention, and security (legitimate interests; legal obligations).
- Communicate service notices and respond to requests (contract/legitimate interests).
- Improve and develop services and analytics (legitimate interests; consent where required for non-essential cookies).
- Comply with legal requirements (e.g., tax, court orders, law enforcement).

### **3) Disclosure**

We disclose personal information to:

- Service providers/“processors” under contract (cloud/hosting, registrars, VOIP carriers, payment processors, ticketing, analytics, email delivery).
  - At your direction, e.g., number porting, domain transfer, or collaboration with other vendors.
  - Legal and safety purposes (comply with law, protect rights, security, or prevent fraud).
- We do not sell personal information.

#### **4) Cross-Border Transfer**

Our vendors may process information in Canada, the United States, and other countries. We use contractual (including confidentiality and security obligations) and technical measures appropriate to the sensitivity of the data. By using the services, you consent to such transfers.

#### **5) Retention**

We retain personal information only as long as necessary to provide services and for legitimate business/legal purposes (e.g., tax and audit). Backups and logs are kept on rotating schedules and then deleted or de-identified.

#### **6) Security**

We use administrative, technical, and physical safeguards appropriate to the risk (access controls, encryption in transit, least-privilege, monitoring). No method is 100% secure.

#### **7) Your Rights & Choices**

Subject to legal exceptions, you may request access, correction, or deletion of your personal information; you may also withdraw consent to optional processing (e.g., marketing). Use the contact above; we respond within 30 days. Cookie preferences can be managed via browser settings and our banner (where applicable). You may opt out of non-essential marketing at any time.

#### **8) Client Data We Process on Your Behalf**

When you store customer/patient lists, call records, or other content in systems we administer, you are the organization controlling the data and AdaptX acts as a service provider/processor. We:

- process such data only per your documented instructions and our agreement;
- implement appropriate safeguards;
- notify you without undue delay of any security incident affecting such data; and
- delete or return data at the end of services, subject to lawful retention.

If you handle health information (e.g., under Alberta's Health Information Act), you are responsible for compliance and for entering into any information-manager or business-associate-type agreement required; we will sign additional terms where needed.

#### **9) Changes**

We may update this Policy from time to time. We will post the updated version with a new effective date and, for material changes, provide notice via email or the client portal.

#### **10) Questions or Complaints**

Contact [privacy@adaptx.ca](mailto:privacy@adaptx.ca). If unresolved, you may contact the **Office of the Privacy Commissioner of Canada** or the applicable provincial privacy commissioner.