

HD GROUP PRIVACY POLICY

Effective Date: October 29th, 2021 **Last modified:** October 29th, 2021

INTRODUCTION

Please read the below “**Privacy Policy**” carefully before downloading the HD Group mobile application (which may also be referred to herein as the “**App**”), which is being made available to you by **HD Group** (the “Company,” “HD Group,” “us”, “we”, or “our”) via the Apple App Store (for iOS devices) or Google Play (Android), or before using the HD Group website (the “**Site**”), collectively referred to herein as the “**Services**.”

HD Group respects your personal information (which means any information about you as an identifiable individual) and we are committed to protecting it through our compliance with this Policy and applicable law. This Privacy Policy describes:

- The types of personal information we collect from you and that you provide when you access or use the Company’s Services; and
- Our practices for collecting, using, and disclosing that information.

We will only collect your personal information when we have your consent or as otherwise required or permissible by law.

HD Group uses the App to administer the employment relationship with you. We may make occasional updates to this policy, and will always have a current policy posted to our services.

WHEN YOU APPLY FOR SHIFTS

You understand that when you apply for employment opportunities via the App (“**Shifts**”), HD Group will collect, use, and disclose your information in accordance with this Policy. Shifts may be posted by and for work with HD Group at HD Group customers (“**Customers**”) or Shifts posted by third party companies (“**Contractors**”).

You understand that if you are using the Services to apply for Shifts with Contractors, those Contractors will have access to all relevant information you submit to HD Group to assess suitability with those Contractor’s requirements (via an external service, “Digistaff”). If you do not wish Contractors to have access to your information, please do not use the App to apply for Contractor Shifts.

Contractors may choose to have HD Group administer aspects of your employment with them and in those cases you would use the App to sign in and out of Contractor Shifts. We do not control the privacy practices of Contractors.

When you apply for Shifts with HD Group we will share certain information with Customers that they require for you to be able to work at their sites.

HOW WE COLLECT INFORMATION

We collect personal information directly from you when you provide it to us during registration and certain information automatically when you use the App or the Site.

We will only collect, use and disclose as much information as is reasonably necessary to meet the purposes for which it was collected.

Information You Submit and That We Collect

When you register for the Services, we will ask you to provide your first name, last name, telephone number, date of birth, information pertaining to past employment, and your email address. We may collect additional information from you that is necessary for the administration of the employment relationship with you, which may include all or some of the following: SIN, Vaccine status, mailing address, work availability, and proof of immigration/work permit documentation. We require all of this information to register, process and administer your employment with us.

You will also be asked to create a username and password to access your account.

We may also collect feedback about you from Customers regarding your performance (star rating system).

You may also, at your option, choose to provide us with additional information such as any other licenses or certifications you hold, your past employment history, interests or hobbies, and other relevant skills.

We will not share your social insurance number or other information with Contractors or other third parties outside of what is necessary to administer your employment relationship with HD Group.

Tracking Technologies and Information Collected Automatically

When you download, access, and use the App, it will use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number as well as device diagnostic data (crash data and performance data, for example).

When you use the Site or the App, the following additional information will be collected automatically:

- We use so-called "cookies," web beacons, and other similar tracking technologies, including from third-party partners such as Google, to be able to better target advertisements and for marketing purposes.
- These technologies allow us to display our promotional material to you on when you visit external sites.

We may share information related to your access and engagement on our Site with certain third parties (including third-party websites or social networking platforms) for the purposes of providing you with better-targeted advertisements.

HOW WE USE YOUR INFORMATION

We use your personal information:

- To create an account for you.
- To administer your employment relationship with HD Group.
- To provide you with the Services and to allow you to apply for Shifts with HD Group and/or Contractors.
- To facilitate your communications with Contractors, including enabling a chat functionality.
- To track your Shifts with HD Group and Contractors, where applicable.
- To communicate with you, which includes sending SMS text messages and push notifications to you for authentication purposes and to alert you to your upcoming Shift.
- To run analytics (we provide your IP address to Google Analytics; when we obtain the reports, we only receive aggregated information, which is not linked to any users of the App or Site).
- If you choose to opt into our mailing list, we may send you, from time to time, promotional information we think will be of interest to you. You will have the opportunity to opt-out of those communications at any time following the instructions in the communication or by contacting us indicating your wishes at kevin@hdgroup.ca

The usage and device information we automatically collect helps us to improve our Services and to deliver a better experience by enabling us to:

- Estimate our audience size and usage patterns.
- Recognize when the App or the Site is used and which features are accessed.

We collect this information on an aggregated basis only and will not be linked with your personal information.

SHARING YOUR INFORMATION

We will not sell your information to any third party. We will only disclose your information as follows:

- To Customers to the extent necessary for you to perform work on Customer sites or as may be required by law;
- With your consent, we will share information about your performance with Customers.

- To service providers, third-party processors, and other third parties we use to deliver the Services.
- To a purchaser in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets.
- As may be required by law or as legitimately requested by law enforcement or pursuant to a legal obligation, in which case we will use reasonable efforts to provide notice to you.
- Contractors will have access to your name and employment history and may invite you to apply for a Shift via a notification within the App. You may also view Contractor Shifts by browsing all Shifts on the App. We will not share your contact information or any other personal information until you apply for a Contractor Shift, at which point you are enabling your contact information and work history to be transferred to our affiliate Scout, where it can be accessed by Contractors. Digistaff has its own privacy policies, which HD Group does not control. Digistaff will collect your information in accordance with their privacy policy. Please make sure you read and understand their privacy policy.
- We will not share any additional information with Scout or Contractors. If you are accepted as an employee by the Contractor, you may be asked by the Contractor to provide additional information required for your employment.

YOUR CHOICES

You may choose to opt-out from receiving notifications about Shifts or from having your name and profile visible to Contractors. However, you may not be able to use all Services provided, including being notified or contacted about Contractor Shifts.

You may also choose to disable sharing the star-rating information with other Customers.

The information you provide using the chat functionality is at your discretion. We ask you not to submit any sensitive personal information about you or others when you use the chat function with us or with Contractors.

ACCESSING, CORRECTING, AND DELETING YOUR PERSONAL INFORMATION

You may send us an email at kevin@hdgroup.ca to request access to, correct, or delete any personal information that you have provided to us. We will accommodate your request within a reasonable time. Depending on the nature of the request, it may mean that you will no longer be able to use our Services.

If you delete the App from your mobile device, we will delete your account but may retain certain information, in accordance with applicable law and the provisions of this Privacy Policy.

DATA RETENTION

We will retain information collected via HD Group for as long as we are providing Services to you with respect to such information. We will retain information for as long as it may be required under applicable laws and regulations. We will delete information when it is no longer required,

subject to any legal retention periods. If you wish for us to retain your information for longer, please contact us.

DATA SECURITY

We follow industry-recognized standards on information security management to safeguard your information. Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we follow all legal requirements and do our best to protect your personal information, we cannot guarantee you that it will be.

CHILDREN

We do not knowingly collect information from anyone under the age of 18. If you are under the age of 18, you may not download the App or use the Services.

DATA TRANSFERS

HD Group is located in Toronto, Ontario and all data will be stored in data centres in Canada. We use certain third-party providers who are located in the United States who may access personal information for support purposes.

CHANGES TO OUR PRIVACY POLICY

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will alert you to those changes.

QUESTIONS AND CONTACTING US

If you have any questions or wish to contact us regarding our use of personal information, you can contact our Privacy Officer at kevin@hdgroup.ca.

Should you have any complaints about this Policy or about how we process your personal information, we hope that you will contact us directly, but you are also entitled to contact the Office of the Privacy Commissioner of Canada toll-free: 1-800-282-1376.