Scope
Synerion is committed to protecting the confidentiality of our customer information and the personal information of our customers’ employees. Hence, Synerion has implemented a Privacy Program built on the principles of PIPEDA (Personal Information and Protection Electronics Document Act).

Accountability
This Privacy Policy is applicable to all information that Synerion processes under the direction of its customers when using our web enabled workforce management software products. Synerion expects our employees and partners to maintain the trust placed in us, and we periodically assess privacy compliance.

We do not trade, sell or lease personal information entrusted to us. Our products and services are not directed to children and we do not knowingly collect or maintain information from anyone under 13.

Synerion has no direct control or ownership of the personal data it processes. We are not responsible for the content of free text fields that are entered by our customers.

Purpose - Why We Collect Personal Information
The information collected through our products is solely for the purpose of providing the service to our customers. Synerion does not acquire any more information than what is necessary to provide a high level of service or if required by law. Some of this information may be collected directly from an individual, however most information is collected by our customers relating to the use of our products and services.

We may also gather information by observing how individuals interact with our website, products and services.

Consent
Customers are responsible for obtaining consent when they collect information in relation to our workforce management products.

What Personal Information Do We Collect
Our products may require customers to collect individual contact information such as name and email address or unique identifiers such as employee number or mathematical calculations that represent a hand or finger print. This information is used to create access to services on the product, to send processing related alerts or notifications and to contact users of the product.

Our workforce management products require a minimum set of employee profile data to function properly, including, but not limited to, employee name, employee number, and hire date. Customers collect this information from their employees and enter it into the product for it to work effectively. Our products allow for other work-related information to be used and stored such as contact phone number, professional licenses, and union membership. Our customers determine which of these fields are necessary for their operations.
It is recommended to customers to avoid storing any sensitive employee information which is not necessary for the product to function, such as social insurance numbers, home addresses, home phone numbers, gender and birthdates except where the product is being used for employee self-service.

**Who Sees Your Personal Information**
Synerion customer service representatives have access to some transaction information in order to respond to customer questions related to our workforce management products.

It is Synerion’s policy to never provide information to third parties unless such disclosure is necessary to process transactions or provide services for which we have been contracted. For example, information about transactions are forwarded to payment processors and banks.

From time to time Synerion may also provide third parties with aggregate information that is not linked to any individual.

The only exception to any part of this section is if Synerion is compelled to do so by an appropriately empowered governmental authority.

**Retention and Destruction of Personal Information**
Our workforce management products require data to function effectively. The customer determines how long they wish to maintain employee records within the system.

Once a customer is no longer a customer, data is removed from Synerion systems within 90 days.

**Protection of Personal Information**
Synerion will endeavour to protect personal information from loss, theft, unauthorized access, unauthorized disclosure or modification and destruction through appropriate administrative, technical and physical security measures and safeguards. The level of safeguards used to protect personal information will depend on the sensitivity of the personal information. No technology is 100% so while we strive to protect your personal information, we cannot guarantee its absolute security.

**Access to and Correction of Personal Information**
Synerion relies on customers to keep the information they store in our workforce management products accurate and up to date. Individuals who want access to the information stored within the software are referred to their employer.

In the rare event that a customer is not available to provide access, an individual may request access in writing, via the contact information provided below.

**Changes to this Policy**
Any updates or changes to our Privacy Policy will be posted here and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Policy, we will notify you here, by email, or by a notice on our website.

**Contact Information**
For questions or comments regarding this Policy, the Privacy program in general, or to file a complaint about how personal information has been handled, please contact:
If Synerion receives a complaint, we will investigate it and respond to the individual filing the complaint within 45 days of receiving it. If an individual is not satisfied with the response, they may file a formal response with the Privacy Commissioner in their province or the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec,
K1A 1H3
1-800-282-1376