

Disclaimer

Visitors to our website and users in general should note that:

The use of our website is solely at their own risk on an "as is", "as available" basis. Information on our website is provided for general purposes only.

ONxpress makes no warranty or representation as to the accuracy, quality or completeness of any information on our website. ONxpress disclaims all warranties and conditions including merchantability and fitness for a particular purpose, either express or implied, and disclaims any liability for loss or damages which result directly or indirectly from the use in any form of any of the information on our website including any personal information provided by visitors and users in general. Where such warranties or conditions are legally incapable of exclusion, then ONxpress's liability shall be limited to the sum of \$100.00 in the aggregate regardless of the number of occurrences. Users assume all risks concerning the suitability to their needs and the accuracy of information on our website and any publications therein.

The use of this website or any e-mail communication to any one at ONxpress does not give rise to a client relationship notwithstanding receipt of such communication. A client relationship shall only arise upon our mutual agreement in writing.

Internet communications may not be confidential and ONxpress does not guarantee the confidentiality of any e-mail or internet transmissions. Users are cautioned not to send any information where confidentiality or privacy may be an issue via e-mail or the internet. ONxpress assumes no liability whatsoever for any confidential information sent to us over the internet.

ONxpress expressly disclaims any liability regarding links to other websites or any information, products, or services that they contain.

Any legal questions or disputes arising from the use of our website shall be governed by the laws of the Province of Ontario and the laws of Canada applicable therein. The courts of the Province of Ontario shall have primary jurisdiction over any such legal questions or disputes.

For the purposes of this Disclaimer, ONxpress shall include its partners, principals, officers, directors, employees, agents, authorized representatives as well as its affiliated corporations and their respective officers, directors, shareholders, employees, agents, and authorized representatives.

ONxpress reserves the right to make changes at any time to the website which may include information including these terms, services, and technical specifications, without notice. Users are responsible for checking such updates.

Privacy Statement

For the purposes of this Privacy Statement, ONxpress includes its partners and affiliated corporations.

This Privacy Statement was last updated: Mar. 29th, 2023.

ONxpress may collect personal information from different sources depending on the services that we are providing or whether we are collecting this personal information for our internal business operations. For example, we may collect personal information directly from you when you retain us or your employer when your employer retains us. We may also collect personal information from you when you apply for employment or an internship with us. We may also collect personal information through third parties who perform background checks and credit checks for us. In addition we may collect personal information through third party analytics and advertising firms who assist us in our marketing. These businesses may provide us with data about your online activities on other sites where we show our advertising and marketing material.

We collect the following types of personal information:

- Contact information, such as your name, title, role, employer, telephone, email address, and mailing address.
- Visitor information when you attend at our offices or events, such as your name, company, and persons you visited at our offices and events.
- Public profile information, such as information that you have made public on LinkedIn or your company's website.
- Communications, such as the content of your emails, voicemails, and other communications with us
- Communication preferences and interests, such as when you subscribe to receive our newsletters, updates, or other materials.
- Feedback, such as when you fill out client surveys or feedback forms at our events.
- Recruitment information, such as information contained in CVs and cover letters, references, and other information you may provide if you apply for employment or an internship, or that we collect as part of our recruitment activities.
- Background check information, such as credit checks, criminal records checks, economic, and other sanctions checks, credential checks and other background information.
- Portal/Vendor registration information, such as email address, password, and activities using our client portal, if applicable.
- Device and browser information when you use our website www.onxpress.ca, such as your IP address, browser type and version, time zone setting, operating system, device type, hardware model, MAC address, and network information.
- Browsing information when you visit our website, URL clickstream data about your visit to, through and from our website, page response times, downloads, and length of visits and interaction information.
- Marketing interaction information, such as whether you opened one of our electronic newsletters or clicked on an advertisement or otherwise interacted with our marketing materials.

The purposes of our collection, use, sharing and disclosure:

We may collect, use, share or disclose personal information for the following purposes:

- Vendor management, such as managing the services that third parties deliver to us or to client(s) on our behalf.
- Legal and regulatory compliance, such as conducting screening for conflicts, complying with anti-money laundering laws, conducting sanctions checks, and to maintain books and records that are required by law or that assist us in meeting our legal and regulatory obligations.

- Relationship management, such as establishing, maintaining, and administering our relationship with you or your employer, and which may include client account opening, accounting, invoicing, risk analysis, conflict checking, and customizing the services we offer to our client(s).
- Recruitment, such as processing your application for employment or an internship or when we proactively recruit new employees or co-op placements.
- Communications, such as responding to your inquiries, sending you newsletters, updates, or other material, and managing your preferences.
- Events management, such as reserving your place at our events, noting dietary restrictions or choices, and other event related purposes.
- Feedback, such as client surveys, event feedback, and addressing concerns that you might have attended and shared your information with ONxpress.
- Security, such as monitoring who has had access to our premises, and protecting our website from misuse.
- Website management, such as monitoring what visitors, visit our website, and whether there are problems with features and functionality.
- Improvement of our business, understanding what our visitors, prospective employees and vendors find interesting, improving our website, improving how we use vendors to provide services to us or to our clients.

Sharing Personal Information: We may disclose or share personal information in order to fulfill legal requirements or to operate, market, and improve our business.

The following are examples of entities that may receive personal information with from us. These entities will only use your personal information in accordance with our instructions or as otherwise required by law:

- ONxpress members, stakeholders and partners, when necessary to vet services or products across multiple business units, to make referrals, to assess potential conflicts.
- Service providers, who provide outsourced business services to us, who assist us in marketing and advertising or events, or who assist us in providing or managing our information technology and communications systems.
- Screening service providers, who perform credit checks, sanctions screening, crime or anti-money laundering checks, and other background checks.
- Clients, as part of work product, such as when we are retained to conduct an audit or investigation or prepare a report or advice, and your personal information is relevant to that work product.
- Analytics providers and advertising networks, who support our analysis of the performance of our website, microsites and mobile apps and your interests, or who assist us in placing advertising on other sites.
- The following are examples of entities that we may disclose personal information to. In situations involving such disclosure, ONxpress has no control over how these entities may use your personal information: Emergency responders, emergency contacts, or public health authorities, when necessary to respond to an emergency, or address an urgent occupational health and safety issue or outbreak of communicable diseases.
- Law enforcement bodies and regulators, when required under applicable laws, such as anti-money laundering reports, or where we are reporting a contravention of laws.
- Other third parties, in the course of a commercial transaction involving the acquisition of or transfer of any part of our business.

Consent and other legal bases

There may be several reasons why we might collect, use, share or otherwise handle your personal information. These include:

- Your explicit or implicit consent, such as when you provide the personal information as part of a request for services or a product, when you provide the personal information for a specific purpose or we ask you to consent to our use of your personal information for a purpose or for the purposes set out in this Privacy Statement.

- With the consent of someone with authority to provide the information to us, such as your employer or a third party to whom you provided the information and who has the legal right to share it with us.
- Where necessary to fulfill our legal obligations, such as where we need to conduct client screening, anti-money laundering checks, or for other legal and compliance purposes where the law permits us to handle personal information with your consent.
- For the purposes of responding to legal claims against us.
- To conduct investigations where the law permits us to handle personal information without your consent.

We may use your business contact information to contact you in your business, role, function, or occupation without your consent. If we send you commercial electronic messages, we will comply with Canada's Anti-Spam Legislation, subject to any exceptions permitting us to send unsolicited commercial electronic messages. You may unsubscribe from our communications at any time.

Security

We use physical, technical, and organizational security measures that are consistent with standards in our industry. These security measures are designed to protect the confidentiality and integrity of personal information in our custody. We use contractual or other means to require our service providers to protect the confidentiality and integrity of personal information we entrust to them. Unfortunately, no system of security measures can guarantee the security and privacy of personal information. If you are sharing highly sensitive information electronically with ONxpress, please speak with us about methods of secure file transfers.

Location and retention

Personal information is stored primarily in Canada. However, we may also use service providers or the assistance of partners, except where we are restricted by legal or contractual requirements. The laws of other jurisdictions may not be as protective as those in Canada and personal information held outside of Canada may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of these other countries in accordance with their laws.

We retain information for the purposes for as long as it is necessary to fulfill the purposes for which we collected it. We also retain personal information to meet obligations under applicable laws and regulatory requirements and to maintain records for possible litigation or investigations, where required.

Children and minors

We do not knowingly collect personal information from children or other persons who are under 14 years of age except as part of our engagements such as career exploration, bring your child to work days or where a child is brought into our office as a visitor and may require a visitor pass. Our website and marketing materials are only for use by individuals who have reached the age of majority in their province or country of residence.

Cookies

Below we provide information on how we may use website cookies on our website.

A cookie is a small data file of information offered to your computer or device by web servers to keep track of your browser as you navigate our websites. Using this information, we learn how you interact with our websites, how we can improve the design and content of our websites and improve your experiences. We do not use cookies to access personal files on your computer or device.

Our website, advertisements, and email communications may use pixel files. Pixel files keep track of your browser or your interaction with our advertisements and marketing material. We may also use pixel files to determine when you have opened a promotional communication from us.

Our ad management providers may use cookies and pixel files to populate an advertisement for us when you visit certain other websites.

Analytics

Our websites may use analytics services, including Google Analytics, a web analytics service provided by Google, Inc. These analytics providers use cookies to help the website analyze how users use the site. In some cases, the information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by analytics providers on servers outside of Canada. This information is used for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Your choices

If you would prefer not to accept cookies, most browsers will allow you to:

- (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it;
- (ii) disable existing cookies or delete cookies when you close your browser; or
- (iii) set your browser to automatically reject any cookies. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

You can opt-out of network advertising programs that track your activities across multiple websites to deliver personalized advertising content to you. Please visit [Digital Advertising Alliance](#) of Canada Opt-Out Page, [NAI Opt-Out Page](#) and the [Ad Choices Opt-Out Page](#). These websites provide tools that identify member companies that have placed cookies on your browser and provides mechanisms to opt-out of those cookies. You will still receive other types of advertising from participating companies; however, it will not be based on your interests. Deleting browser cookies can remove your opt-out preferences, so you should use these tools periodically to ensure that your preferences are up-to-date.

Your rights:

Canadian privacy laws provide you with certain rights, including those listed below. Please see “How to contact us” for the contact information of our Privacy Officer in order to exercise these rights.

- **Access**— you have the right to ask us if we have collected personal information about you and to obtain access to that information. Where you wish to exercise this right, we will ask you for information to confirm your identity and may ask you to assist us in describing your relationship with us so that we can locate the relevant personal information. Please note that we may withhold disclosure of personal information in certain cases under applicable laws.
- **Correction** – you have the right to ask us to correct any incorrect, incomplete or inaccurate personal information we hold about you.
- **Withdrawal of consent** – in some cases, you have the right to ask us to cease collecting, using, or sharing your personal information.
- **Complaints** – you have the right to make a complaint to about our compliance with this Privacy Statement or applicable privacy laws. **Changes**

We may change this Privacy Statement from time to time. Please refer to the date at the top of this Privacy Statement for the last date updated.

How to contact us:

To exercise your rights or to make a complaint, please contact:

Privacy Officer, ONxpress Transportation Partners

Via email: privacyofficer@onexpress.com

Or

Attn: Privacy Officer, ONxpress Transportation Partners

130 Adelaide Street West, 5th Floor

Toronto, ON M5H 0A1