

# PRIVACY POLICY

*Last updated on March 20, 2020.*

Flash Romeo Inc. (hereinafter, “**we**” or “**us**”) respects your privacy and commits to keep your trust and confidence at all costs. Hence, this privacy policy defines the rights granted to you in terms of privacy, in particular when it comes to Flash Romeo collecting, storing, protecting, using, and sharing your personal data and information through the *Voilà! – Schedule Management* application (hereinafter “**Voilà**” or the “**Application**”). By using Voilà, you agree to the terms and conditions of this privacy policy and explicitly consent to your personal data and information being handled hereunder.

**For the purpose of this privacy policy, the term “*personal information*” refers to information that relates to an individual who is identifiable.**

## 1. Privacy Officer

The contact details of the data controller under this policy are as follows:

Flash Romeo Inc.  
5600 des Galeries blvd. (suite 535)  
Québec (Québec)  
G2K 2B4

c/o : Privacy Officer  
[vieprivee@voila.app](mailto:vieprivee@voila.app)

## 2. Basis for Data Processing

In order to enable you to use the Application and all its features, we might have to collect and process personal information about you. Our processing of personal information is mainly based on the following principles:

- We must collect and process some personal information in order to provide you with access to the Application. In doing so, we hope to intervene as a working tool enhancing the quality of the relationship established between you and your employer. Under no circumstances whatsoever shall the Application be conceived as an employment contract.
- Your personal information will be processed on account of the consent you have expressed by agreeing to our terms and conditions of use.
- We may process certain personal data because you have given specific consent. You may withdraw your consent at any time, and we will stop the personal data processing that is based on your consent.

## 3. Data We Collect

We collect the information you provide to us through your use of Voilà. This information may include:

- At the time you create a Voilà account, we can collect personal information such as your last name, first name, email address, phone number, social network ID, a profile picture, and

other relevant information. Such information can be modified at any time by accessing the Application's "Settings" menu of your account.

- We may store any information provided any time you access Voilà through a mobile device, such as the type of device, its exclusive ID, its IP address, its operating system, and its precise physical location (by means of a locator beacon). You may deactivate some of the localization data provided by your device, for instance, by turning off the Voilà localization service which appears in iOS's and Android's privacy settings. We may also keep some historical data such as the date and time at which your device accesses our servers.
- We collect mobile identifiers such as Apple IDFA's and Google Android IDs. Such identifiers are shared only with branch.io, for the sole purpose of providing a "deep" link from an external link via Voilà.
- We collect information in connection with your place of work, schedule, positions, work shifts, hourly rate, and clock-in/clock-out time (the Application can act as a time meter for your employer).

#### **4. Use of your personal information**

We may use your personal information in order to:

- Offer services provided by Voilà;
- Provide you with administrative updates on (for instance) our services or changes we have made to our terms, conditions, and policies;
- Provide you with marketing documents we believe could be of interest to you, such as newsletters;
- Send *push*-type notifications to your mobile device. In the event where you had previously agreed to receive such notification but no longer wanted to, you may disable them directly on your device or by accessing the "Notifications" screen after clicking on the "Profile" tab.
- Send email and SMS notifications to the address and phone number you provided to us. Should you wish not to receive such notifications anymore, you must contact the Application's manager and request a deactivation.
- Fulfill business objectives such as data analysis, audits, fraud monitoring and prevention, developing new products and services, modifications and improvements, identifying trends of use, and performance of promotional activities and campaigns.
- (i) Satisfy requests based on applicable law (including law in force outside of your country of residence); (ii) comply with legal procedures; (iii) fulfill engagements towards public and government authorities (including authorities operating outside of your country of residence); (iv) enforce our terms and conditions; (v) protect our operations and those of our affiliates; (vi) protect our rights, privacy, safety, and property (and/or the property of affiliates, of yourself, or of third parties); and (vii) exercise remedies at our disposal and/or mitigate damages we could incur.
- Monitor global use of the Application by users, prevent any misuse of the Application, identify problems or bugs, and pinpoint features in need of improvement.

## **5. Preservation of Personal Information**

Your personal information will be stored until you require it to be destroyed or it is no longer useful to our activities and operations. We do not commit to keeping your personal information for any specific period of time.

All personal information we collect shall be stored on an electronic medium, namely on servers maintained by our service providers. Such servers, which may be located anywhere in the world, are currently located in Canada.

## **6. Safety of your Information**

The safety of your personal information being one of Voilà's prime objectives, all our services come with technical, physical, and administrative guarantees aimed at protecting you against the loss, destruction, unauthorized access, misuse, modification, and unwarranted disclosure of your personal information. On the other hand, and for obvious reasons, no data transmission or storage system is 100% infallible.

All your personal information is hosted by our service providers, who are firmly committed to deploying adequate security measures aimed at ensuring data integrity and privacy.

Our employees and suppliers, being well aware of the confidential aspect of the personal information we collect, have been familiarized with all security measures aimed at preventing any unauthorized access.

Should you have any questions regarding the security of your relationship with us (i.e. if, for instance, you believe that the integrity of any account you may have with us may be compromised), don't hesitate to contact us at [info@voila.app](mailto:info@voila.app).

## **7. How Personal Information is Disclosed**

None of your personal information shall ever be shared with, or sold to third parties, unless such initiative has been provided for herein.

Some of your personal information may, however, be disclosed to the individuals or entities defined in this section 7, for the sole purposes explicitly stated.

### **Employees of Voilà**

The personal information we collect may be accessed directly by those of our directors and employees who need it in order to enforce this policy privacy.

### **Service Providers**

We may disclose some personal information to our service providers, if doing so allows us to serve our clients more efficiently. We do not sell any personal information and do not allow any service provider to use it themselves. In fact, all our service providers have committed in writing to protect the privacy of personal information, and never to use it outside the scope of the services they supply.

## **Your Employer**

Some of your personal information may be disclosed to your employer whenever he/it uses the Application. In fact, all the information you record to your personal file, as it is stored on the Application, may be consulted by your employer. The latter shall, however, commit to never market such information in any way, and to never use it outside the scope of the contractual relationship it has entered into with us.

## **Legal Obligations**

We may disclose some of your personal information to third parties if we are allowed or required to by law or forced to do so by any competent authority. In any event, we might disclose personal information in the course of judicial proceedings, should that prove necessary in order to protect our rights or the rights of our users.

## **Business Transfer**

Should the sale or the restructuration of any part of our business be contemplated, we shall have the right to disclose personal information to the individuals or entities involved in the transaction (whether before or after, and whether said transaction is finalized or not). In such a case, all involved individuals or entities shall commit to preserving the confidentiality of the personal information, and to use it, in compliance with this privacy policy, for the sole purpose of assessing the potential of the proposed transaction.

## **8. Your Rights regarding your Personal Information**

You can review, correct, update, modify, or delete personal information you have provided by logging on to your account, or by sending us an e-mail request at [vieprivee@voila.app](mailto:vieprivee@voila.app). Please indicate clearly which personal information you wish to modify or delete from our databases. For your own protection, we may only modify information which is directly related to the email address you are sending your request through, and may need to confirm your identity before processing said request. We commit to fulfill your demand in the shortest delay possible.

Should you wish to delete personal information we have collected by means of the Application, we shall notify your employer, who will be given ten (10) days to record the information they believe is necessary in order to maintain a comprehensive employment file.

Please note that we might need to keep certain information for recording purposes and/or to fulfill the transactions you had initiated before requesting the changes (for instances, whenever you confirm a purchase, you cannot modify or delete the information related to said purchase). In any event, some residual information or records may remain in our databases without being deleted.

## **9. Choices you can make when it comes to the Use and Disclosure of your Personal Information**

The personal information you provide to Voilà may be used for marketing purposes, including (but not limited to) exclusive promotional emails, direct mail advertising, and business contacts. In fact, we offer several choices when it comes to using and disclosing your personal information for marketing purposes. You may, at any time, unsubscribe from:

- **Electronic communications** : You may, at any time, refuse to receive any further marketing-oriented emails by asking us to unsubscribe you from our mailing list, at [vieprivee@voila.app](mailto:vieprivee@voila.app). From that point on, we shall not retain your coordinates for marketing purposes. We commit to fulfill your demand in the shortest delay possible.

Please note that should you ever refuse to receive marketing-oriented emails from Voilà, we may still send you messages in connection with your use of the Application. Such messages, as they are administrative in nature, cannot be blocked in any way, except if you stop using the Application.

## **10. Specifics Rights of Residents of the European Union**

Notwithstanding the foregoing, residents of the European Union are granted the following rights:

### **Right to access**

You may have access to some personal information that you have personally provided to us by means of the Application.

To access the personal information that we hold about you, you may make a request in writing to the following address: [vieprivee@voila.app](mailto:vieprivee@voila.app) or to the address of the data controller at the beginning of this policy.

We will respond to your request promptly, allowing you to access your personal information that is under our control. When required by law, we will provide your information in a portable machine-readable format.

We may ask you to confirm your identity before granting access to your personal information.

### **Right to rectification**

You have the right to request the rectification of your personal information if it is incorrect, including the right to have incomplete personal information completed: you may make a request in writing to the following address: [vieprivee@voila.app](mailto:vieprivee@voila.app) or to the address of the data controller at the beginning of this policy.

We will respond to your request promptly, allowing you to access your personal information that is under our control. When required by law, we will provide your information in a portable machine-readable format.

### **Right to portability**

Whenever Voilà processes your personal information by automated means based on your consent, or at any time you use the services we provide, you may obtain a copy of your data in a comprehensive, clear, and machine-readable format. This only includes the personal information you have submitted to us.

We will respond to your request promptly, by allowing you to access the personal information that is under our control. When required by law, we will provide your information in a portable machine-readable format.

## **Withdrawal of Consent**

You may withdraw your consent to the collection and processing of some personal information, for example, by withdrawing your consent to receive our commercial emails.

The Application allows you to withdraw your consent to certain processing of your personal information, including by opting in or out of promotional offers.

Should you wish to withdraw your consent to the processing of personal information beyond what is allowed on the Application, you must send us a written request at [vieprivee@voila.app](mailto:vieprivee@voila.app). It is not materially possible to prevent the use of any personal information while still using the Application. The only way you can prevent *any* personal information from being used is by *not* using the Application at all.

## **Right to object**

You may, in specific circumstances and by sending us a written request at [vieprivee@voila.app](mailto:vieprivee@voila.app), refuse that your personal information be processed by Voilà in the pursuit of legitimate business interests. The exercise of such a right will depend on several factors – including your place of residence.

## **Right to erasure**

You may, at any time and by sending us an email at [vieprivee@voila.app](mailto:vieprivee@voila.app), request that we delete the personal information we have on file. We commit to fulfill your demand in the shortest delay possible.

Please note that if you continue to use the Application in any way, personal information will be collected.

## **Right to complain to a Supervisory Authority**

If you reside in the European Union, you have the right to lodge a complaint about the processing of your personal information with a supervisory authority responsible for the protection of privacy. The competent authority may vary depending on your country of residence.

If you reside outside of the European Union, this policy shall be governed by the laws applicable in Canada and the Canadian authorities shall have exclusive jurisdiction to hear any complaint or proceedings based on this policy or the processing of your personal data by Voilà.

## **Right to restriction**

You have the right to request that Voilà restricts the processing of your personal information under the following circumstances:

- a) if you object to the processing based on Voilà's legitimate interests, we shall restrict all processing of such information pending the verification of the legitimate interests;
- b) if you claim that your personal information is incorrect, we must restrict all processing of such information pending the verification of the accuracy of the personal information;

- c) if the processing is unlawful, you can oppose the erasure of personal information and instead request the restriction of the use of your personal information.

## **Response**

Our main objective is to respond to all legitimate concerns within a month. That being said, complex requests (as well as demands involving several separate issues) may take longer to process.

## **11. Cross-border Transfer**

Subject to applicable laws and regulations, Voilà remains under the control and operation of a Canadian corporation, and as such will not comply to the law or jurisdiction of any other country, state, or territory. Please understand that your personal information may be stored and processed in any country where Voilà operates installations or hires service providers. By using Voilà, you explicitly consent to the transfer of information to countries (including Canada) other than your country of residence, which might apply specific privacy rules and policies that differ from the ones you are familiar with.

## **12. Sensitive Information**

We require that you do not entrust us with (and do not disclose) any personal information of a sensitive nature (such as social security number, details about your race or ethnic origins, political or religious allegiance or beliefs, health condition, biometrics, union involvement, or criminal record) – unless such information has been requested specifically.

## **13. Modifications**

This privacy policy may be amended or otherwise modified from time to time. Consequently, ensure to always refer to the *Last updated* mention at the top of this page to see the most recent date of revision of this policy. Any and all modifications shall come into force and effect at the date at which the revised privacy policy is published through the Application. You will be prompted to acknowledge such modifications by means of a notification which will appear on your screen the next time you log on. By continuing to use Voilà from that point on, you will be deemed having accepted the terms and conditions of the revised privacy policy.

## **14. Technical Support**

Any questions about your personal file (as it is stored on the Application) or to matters relating to your employment contract or relationship (name, address, phone number, availability, work shifts, etc.) should be addressed to your employer directly.

Any and all enquiries pertaining to technical issues (i.e. access or use of the Application's features) should be referred to Voilà, at the following email address: [support@voila.app](mailto:support@voila.app).

## **15. Governing Law**

The interpretation and execution of this privacy policy and of all operations carried out hereunder shall be governed by the laws and regulations of the province of Québec, and, alternatively, by the laws and regulations of Canada which may find application.

## **16. Contact Us**

For any enquiries related to this privacy policy, please contact us at the coordinates provided at the beginning of this policy.