

Innovatank Privacy Policy

Effective September 14th, 2020

Introduction

We are an online case competition and challenge platform for professionals, organizers, innovators, and evaluators. People use our Services to find and be found for business challenges and for business opportunities, to connect with others and find information. Our Privacy Policy applies to any Member or Visitor to our Services

Our registered users (Organizers, Professionals, Innovators, Evaluators) (“**Members**”) share their professional identities, engage with their network, exchange knowledge and professional insights, post and view relevant content, learn and develop skills, and find business and career opportunities. Content and data on some of our Services is viewable to non-members (“**Visitors**”).

Services

This Privacy Policy, including our Cookie Policy applies to your use of our Services.

This Privacy Policy applies to Innovatank.com, Innovatank.ca, Innovatank-branded apps, and other Innovatank-related sites, apps, communications and services (“**Services**”), including off-site Services and plugins, but excluding services that state that they are offered under a different privacy policy.

Data Controllers and Contracting Parties

Académie Érudit Inc. will be the controller of your personal data provided to, or collected by or for, or processed in connection with, our Services.

As a Visitor or Member of our Services, the collection, use and sharing of your personal data is subject to this Privacy Policy and other documents referenced in this Privacy Policy, as well as updates.

Change

Changes to the Privacy Policy apply to your use of our Services after the “effective date.”

Innovatank (“we” or “us”) can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account.

You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy, as of its effective date.

1. Data We Collect

1.1 Data You Provide To Us

You provide data to create an account with us.

Registration

To create an account you need to provide data including your name, email address and/or mobile number, and a password. If you register for a paid Service, you will need to provide payment (e.g., credit card) and billing information.

You create your Innovatank profile (a complete profile helps you get the most from our Services).

Profile

You have choices about the information on your profile, such as your education, work experience, skills, photo, city or area and endorsements. You don't have to provide additional information on your profile; however, profile information helps you to get more from our Services, including helping other innovators, recruiters and business opportunities find you. It's your choice whether to include sensitive information on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.

Posting and Uploading

We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, (e.g., with demographic data), respond to a survey, subscribe or complete a challenge on our Services.

You don't have to post or upload personal data; though if you don't, it may limit your ability to grow and engage with your network over our Services.

1.2 Data From Others

Others may post or write about you.

Content and News

You and others may post content that includes information about you (as part of articles, posts, comments, videos) on our Services. We also may collect public information about you, such as professional-related news and accomplishments, and make it available as part of our Services, including, as permitted by your settings.

1.3 Service Use

We log your visits and use of our Services, including mobile apps.

We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology, such as when you view or click on content (e.g., learning video) or ads (on or off our sites and apps), perform a search, install or update one of our mobile apps, share articles or subscribe for and attempt challenges. We use log-ins, cookies, device information and internet protocol (“IP”) addresses to identify you and log your use.

1.4 Cookies and Similar Technologies

We collect data through cookies and similar technologies.

As further described in our Cookie Policy, we use cookies and similar technologies (e.g., pixels and ad tags) to collect data (e.g., device IDs) to recognize you and your device(s) on, off and across different services and devices where you have engaged with our Services. We also allow some others to use cookies as described in our Cookie Policy. We also collect (or rely on others who collect) information about your device where you have not engaged with our Services (e.g., ad ID, IP address, operating system and browser information) so we can provide our Members with relevant ads and better understand their effectiveness. You can opt-in to our use of data from cookies and similar technologies that track your behavior on the sites of others for ad targeting and other ad-related purposes.

1.5 Your Device and Location

We receive data from your devices and networks, including location data.

When you visit or leave our Services (including some plugins and our cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to and the time of your visit. We also get information about your network and device (e.g., IP address, proxy server, operating system, web browser and add-ons, device identifier and features, cookie IDs and/or ISP, or your mobile carrier). If you use our Services from a mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other *tools* to identify your precise location.

1.6 Messages

If you communicate through our Services, we learn about that.

We collect information about you when you send, receive, or engage with messages in connection with our Services. For example, if you get an Innovatank message, we track whether you have acted on it and may send you reminders. We also use automatic scanning technology on messages to support and protect our site. For example, we use this technology to suggest possible responses to messages and to manage or block content that violates our User Agreement or Community Policies from our Services.

1.7 Workplace and School Provided Information

When your organization (e.g., employer or school) buys a paid Service for you to use, they may give us data about you.

Others buying our Services for your use, such as your employer or your school, provide us with personal data about you and your eligibility to use the Services that they purchase for use by their workers, students or alumni.

1.8 Other

We are improving our Services, which means we get new data and create new ways to use data.

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we collect, use or share your data, we will notify you and may also modify this Privacy Policy.

2. How We Use Your Data

We use your data to provide, support, personalize and develop our Services.

How we use your personal data will depend on which Services you use, how you use those Services and the choices you make in your settings when and if available. We use the data that we have about you to provide and personalize our Services, including with the help of automated systems and inferences we make, so that our Services (including ads) can be more relevant and useful to you and others.

2.1 Services

Our Services help you compete in challenges, connect with others, find and be found for work and business opportunities, stay informed, get training and be more productive.

We use your data to authorize access to our Services and honor your settings.

Stay Connected

Our Services allow you to stay in touch and up to date with colleagues, partners, clients, and other professional contacts. To do so, you can “connect” with the professionals who you choose, and who also wish to “connect” with you. Subject to your and their settings, when you connect with other Members, you will be able to search each others’ connections in order to exchange professional opportunities.

We use data about you (such as your profile, profiles you have viewed or partner integrations) to help others find your profile, suggest challenges, suggest connections for you and others (e.g. Members who share your interests or experiences) and enable you to invite others to become a Member and connect with you. You can also opt-in to allow us to use your precise location or proximity to others for certain tasks (e.g. to suggest other nearby Members for you to connect with, and challenges for you to compete in, or notify your connections that you are competing on a challenge).

Stay Informed

Our Services allow you to stay informed about news, events and ideas regarding challenges and competitions you care about, and from professionals you respect. Our Services also allow you to improve your professional skills, or learn new ones. We use the data we have about you (e.g., data you provide, data we collect from your engagement with our Services and inferences we make from the data we have about you), to personalize our Services for you, such as by recommending or ranking relevant content and conversations on our Services. We also use the data we have about you to suggest skills you could add to your profile and skills that you might need to pursue your next opportunity. So, if you let us know that you are interested in a new skill (e.g., by competing in a certain challenge), we will use this information to personalize content in your feed, suggest that you follow certain members on our site, or suggest related learning content to help you towards that new skill. We use your content, activity and other data, including your name and photo, to provide notices to your network and others. For example, if allowed by your settings, we may notify others that you have updated your profile, posted content, competed in a challenge, used a feature, made new connections.

Challenges

Our Services allow you to explore challenges, evaluate educational opportunities, and seek out, and be found for, career opportunities. Your profile can be found by those looking to hire (for a job or a specific task) or be hired by you. We will use your data to recommend challenges, jobs or mentees, show you and others relevant professional contacts (e.g., who work at a company, in an industry, function or location or have certain skills and connections). You can signal that you are interested in challenges and share information with recruiters. We will use your data to recommend challenges to you and you to recruiters. We may use automated systems to provide content and recommendations to help make our Services more relevant to our Members, Visitors and customers. Keeping your profile accurate and up-to-date may help you better connect to others and to opportunities through our Services.

Productivity

Our Services allow you to collaborate with colleagues, search for potential clients, customers, partners and others to do business and to compete with. Our Services allow you to communicate with other Members and schedule and prepare meetings with them. If your settings allow, we scan messages to provide “bots” or similar tools that facilitate tasks such as scheduling meetings, drafting responses, summarizing messages or recommending next steps.

2.2 Paid Services

Our paid Services help paying users to search for and contact Members through our Services, such as searching for and contacting job candidates, sales leads and co-workers, manage talent and promote content through social media.

We sell paid Services that provide our customers and subscribers with customized-search functionality and tools (including messaging and activity alerts) as part of our talent, marketing and sales solutions. Customers can export limited information from your profile, such as name, headline, current company, current title, and general location (e.g., Montreal), such as to manage sales leads or talent, (only if you Opt-In). We do not provide contact information to customers as part of these paid Services without your consent. Paid Services customers can store information they have about you in our paid Services, such as a resume of challenges completed or contact information. The data stored about you by these customers is subject to the policies of those customers.

2.3 Communications

We contact you and enable communications between Members. We offer settings to control what messages you receive and how often you receive some types of messages.

We will contact you through email, mobile phone, notices posted on our websites or apps, messages to your Innovatank inbox, and other ways through our Services, including text messages and push notifications. We will send you messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use our Services, network updates, reminders, challenge suggestions and promotional messages from us and our partners. You may change your communication preferences at any time. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We also enable communications between you and others through our Services, including for example invitations, groups and messages between members.

2.4 Marketing

We promote our Services to you and others.

In addition to advertising our Services, we use Members’ data and content for invitations and communications promoting membership and network growth, engagement and our Services, such as by showing your connections that you have used a feature on our Services.

2.5 Developing Services and Research

We develop our Services and conduct research.

Service Development

We use data, including public feedback, to conduct research and development for our Services in order to provide you and others with a better, more intuitive and personalized experience, drive membership growth and engagement on our Services, and help connect innovators and professionals to each other and to economic opportunity.

Other Research

We seek to create economic opportunity for Members of the global workforce and to help them be more productive and successful. We use the personal data available to us to research social, economic and workplace trends, such as jobs availability and skills needed for these jobs and policies that help bridge the gap in various industries and geographic areas. In some cases, we work with trusted third parties to perform this research, under controls that are designed to protect your privacy. We publish or allow others to publish economic insights, presented as aggregated data rather than personal data.

Surveys

Polls and surveys are conducted by us and others through our Services. You are not obligated to respond to polls or surveys, and you have choices about the information you provide.

2.6 Customer Support

We use data to help you and fix problems.

We use data (which can include your communications) to investigate, respond to and resolve complaints and for Service issues (e.g., bugs).

2.7 Insights That Do Not Identify You

We use data to generate insights that do not identify you.

We use your data to produce and share insights that do not identify you. For example, we may use your *data* to generate statistics about our members, their profession or industry, to calculate ad impressions served or clicked on, or to publish visitor demographics for a Service or create demographic workforce insights.

2.8 Security and Investigations

We use data for security, fraud prevention and investigations.

We use your data (including your communications) for security purposes or to prevent or investigate possible fraud or other violations of our User Agreement and/or attempts to harm our Members, Visitors or others.

3. How We Share Information

3.1 Our Services

Any data that you include on your profile and any content you post or social action (e.g., likes, follows, comments, shares) you take on our Services will be seen by others, consistent with your settings.

Profile

Your profile is fully visible to all Members and customers of our Services.

Solution Submissions, Messages

Our Services allow viewing and sharing information including through posts, likes, follows and comments.

- Any information you share through companies' or other organizations' challenge pages on our Services will be viewable by it and by evaluators who have access to those pages.

A challenge creator "organizer" and "evaluators" who have been granted access by the organizer can see how you use Services relevant to the challenge they created and that you subscribed to. We will not show them personal messages or other challenge solutions.

Accounts Provided by Schools or Organizations

Your school or organization may offer you access to our Services such as Helper, Innovator, Evaluator. Your school or organization can review and manage your use of such Services. By accepting to use our services paid for by your school or organization, you agree to abide by our User Agreement and all other policies.

3.2 Others' Services

You may link your account with others' services so that they can look up your contacts' profiles, post your shares on such platforms, or enable you to start conversations with your connections on such platforms. Excerpts from your profile will also appear on the services of others.

When you opt to link your account with other services, personal data will become available to them. The sharing and use of that personal data will be described in, or linked to, a consent screen when you opt to link the accounts. For example, you may link your LinkedIn, Twitter or WeChat account to share content from our Services into these other services, or your email provider may give you the option to upload your Innovatank contacts into its own service. Third-

party services have their own privacy policies, and you may be giving them permission to use your data in ways we would not. You may revoke the link with such accounts.

Excerpts from your profile will appear on the services of others (e.g., search engine results, mail and calendar applications that show a user limited profile data of the person they are meeting or messaging, *social media aggregators*, talent and lead managers). “Old” profile information remains on these services until they update their data cache with changes you made to your profile.

3.3 Related Services

We share your data across our different Services and Innovatank affiliated entities.

We will share your personal data with our affiliates to provide and develop our Services. We may combine information internally across the different Services covered by this Privacy Policy to help our Services be more relevant and useful to you and others. For example, we may update Innovatank.ca with data from Innovatank.com.

3.4 Service Providers

We may use others to help us with our Services.

We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

3.5 Legal Disclosures

We may need to share your data when we believe it’s required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you; (3) investigate and defend ourselves against any third-party claims or allegations; (4) protect the security or integrity of our Services (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of Innovatank, our Members, personnel or others. We attempt to notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

3.6 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

4. Your Choices & Obligations

4.1 Data Retention

We keep most of your personal data for as long as your account is open.

We generally retain your personal data as long as you keep your account open or as needed to provide you Services. This includes data you or others provided to us and data generated or inferred from your use of our Services. Even if you only use our Services when looking for a new challenge every few years, we will retain your information and keep your profile open, unless you close your account. In some cases we choose to retain certain information (e.g., insights about Services use) in a depersonalized or aggregated form.

4.2 Rights to Access and Control Your Personal Data

You can access or delete your personal data. You have many choices about how your data is collected, used and shared.

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you, you can:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** *You can ask* us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

You may contact us using the contact information below, and we will consider your request in accordance with applicable laws.

4.3 Account Closure

We keep some of your data even after you close your account.

If you choose to close your Innovatank account, your personal data will generally stop being visible to others on our Services within 24 hours. We generally delete closed account information within 30 days of account closure, except as noted below.

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse (e.g., if we have restricted your account for breach of our Community Policies), enforce our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed.

We do not control data that other Members have copied out of our Services. Groups content, challenge solutions, and ratings or review content associated with closed accounts will continue to exist on the platform. Your profile may continue to be displayed in the services of others (e.g., search engine results) until they refresh their cache.

5. Other Important Information

5.1. Security

We monitor for and try to prevent security breaches. Please use the security features available through our Services.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

5.2. Cross-Border Data Transfers

We store and use your data outside your country.

We process data both inside and outside of Canada and rely on legally-provided mechanisms to lawfully transfer data across borders. Countries where we process data may have laws which are different from, and potentially not as protective as, the laws of your own country.

5.3 Lawful Bases for Processing

We have lawful bases to collect, use and share data about you. You have choices about our use of your data.

At any time, you can withdraw consent you have provided by going to settings.

We will only collect and process personal data about you where we have lawful bases. Lawful bases include *consent* (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g., to deliver the Innovatank Services you have requested) and “legitimate interests.”

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact us.

5.4. Direct Marketing and Do Not Track Signals

Our statements regarding direct marketing and “do not track” signals.

We currently do not share personal data with third parties for their direct marketing purposes without your permission.

5.5. Contact Information

You can contact us or use other options to resolve any complaints.

Please email us at support@innovatank.com or contact us through our website.