

Privacy Policy

Last Updated: February 5, 2020

IRefer Inc. (“SUPERVISA”) provides this Privacy Policy to inform you about our practices concerning the collection, use and disclosure of your information. By using the website located at www.supervisa.ai (including all subdomains) (the “Site”) or the services provided by SUPERVISA (the “Services”), you agree to the information practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you may not access or use the Site or Services. This Privacy Policy is incorporated into and subject to the SUPERVISA Terms of Use. If you purchase Services that include representation by independent licensed representative, your relationship with the independent licensed representative will be governed by the Representation Agreement.

SUPERVISA.AI IS NOT A LAW FIRM, DOES NOT PROVIDE LEGAL ADVICE AND IS NOT A SUBSTITUTE FOR THE ADVICE OF AN INDEPENDENT LICENSED REPRESENTATIVE. YOUR USE OF THE SITE AND SERVICES, AND YOUR COMMUNICATION WITH SUPERVISA.AI, DOES NOT CREATE AN ATTORNEY-CLIENT RELATIONSHIP. YOUR COMMUNICATIONS WITH SUPERVISA.AI ARE NOT PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE. YOUR COMMUNICATIONS WITH THE INDEPENDENT LICENSED REPRESENTATIVE ARE GOVERNED BY THE REPRESENTATION AGREEMENT.

Information We Collect

1.1. Personal Information

When you use the Site or Services, we collect certain information from you which can be used to contact or identify you, including, but not limited to, your name, gender, date of birth, telephone number, postal address, and email address (“Identity Information”). If you place an order for Services and/or pay a fee, we will collect additional payment and billing information from you, including, but not limited to, your credit/debit card information or bank account information (“Billing Information”). If you place an order for Services, you may also be required to provide information or documents necessary for preparation or filing of forms or applications to be submitted to government agencies, and if you file an application, we may receive from the government a unique receipt number assigned to your application

(“Application Information”). Together, your Identity Information, Billing Information and Application Information are referred to as “Personal Information.”

1.2. Usage Data

We also automatically collect certain information regarding your access to and use of the Site and Services. This information includes, but is not limited to, your IP address, browser type, referring website URLs, log files, pages on the Site that you visit, and links you click on (“Usage Data”).

1.3. Cookies

Like many websites, we utilize devices to recognize you when you visit the Site, track your interactions with the Site, and personalize your experience. These include devices such as cookies, web beacons, pixels and similar devices. Cookies are small data files we transfer to your computer hard drive. We utilize some cookies that remain on your computer after you leave the Site so that we can recognize you when you return and provide a more personalized and helpful experience. We also utilize session cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor use of the Site by SUPERVISA users and web traffic routing on the Site. Session cookies are deleted from your computer when you log off from the Site and close your browser. You maintain control over some of the information we collect through the use of cookies, and you can set your preferences regarding the use of cookies through your browser settings. If you choose not to accept cookies, you may not be able to access portions of the Site or all functionality of the Services.

1.4. EU Lawful Grounds

If you reside in the European Economic Area or Switzerland (collectively the “EU”), we rely on the following lawful grounds under the General Data Protection Regulation (“GDPR”) to process (collect, store, and use) your personal data contained in Personal Information and Usage Data: (a) it is necessary for the performance of a contract with you; (b) our legitimate interests; and (c) your consent. If you are a customer, the lawful ground for processing your personal data is necessity in performing our contract to provide the Services to you; our legitimate interest in understanding, improving, and promoting our services; and your consent. If you visit or use our website, the lawful ground for processing your personal data is our legitimate interest in understanding how users interact with our website to improve our website and Services, and your consent.

Use of Information We Collect

2.1. Account Creation

We use information you submit to us at the time of account registration, such as your name and email address, and any updated information you subsequently submit, such as a new email address, to create and maintain your account.

2.2. Operation and Improvement of Our Business

We use your information, including Personal Information, primarily to operate our business and provide the Services to you, including the completion of immigration forms. We use such information to personalize the Services we provide to you. We may use your information to verify your identity, for fraud prevention, to enforce the Terms of Service and to protect the integrity of the Site. We may also use your information to develop new features or Services and to improve the quality of our Services.

2.3. Customer Service and Technical Support

We may use your information, including Personal Information, to respond to questions you have regarding use of our Services or to provide technical assistance.

2.4. Communications with You

We may contact you using the contact information you provide in order to respond to inquiries you send to us, to communicate with you regarding our Services and the services of our partners, and to market our Services, or those of our partners, to you. If you are in the EU, we will only use your contact information to communicate with you regarding our partners' services with your prior consent. We may send you emails advertising or promoting our Services or those of our partners. If you do not wish to receive such emails, you can choose to opt-out of receipt using the unsubscribe link within each email, or by sending an unsubscribe request to support@supervisa.ai.

2.5. Internal Research

We may use information about you and other users, in aggregate form, for our own internal research and analytical purposes. For example, we may use certain types of your information to understand which features of our Services are being used most frequently.

2.6. Application Status

We may use your government receipt number from time to time to check your application status, so that we may provide you with pertinent general information about the steps in the application process. If, at any time, you do not want SUPERVISA to retain your government

receipt number or to check your application status, let us know by contacting our customer service department at support@supervisa.ai.

Information Sharing and Disclosure

3.1. Your Privacy Rights

SUPERVISA does not share your Personal Information with third parties for their marketing purposes without your consent.

3.2. Upon Consent

We may share your information, including Personal Information, with third parties if you provide us with authorization to do so.

3.3. Service Providers

We may share your Personal Information with third-party service providers, but only to the extent necessary for them to assist us in providing our Services. For example, if you purchase Services, we will share your Billing Information with third-party payment processors to the extent necessary to process your payment. We require all third-party service providers to protect the security of your Personal Information, to keep your Personal Information confidential, and to use such information for no other purposes.

3.4. Responses to Legal Process, Subpoenas or Court Orders

We will not voluntarily disclose your Personal Information. However, we may disclose your Personal Information as required by law, such as in response to a court order, subpoena, or similar legal process legally requiring us to produce the information. If legally permitted and feasible, we will give you notice of our receipt of a demand for your Personal Information and provide you a reasonable time in which to seek to quash such demand in court, or otherwise obtain a withdrawal or modification of the demand, before complying with the demand.

3.5. Business Transfers

Your Personal Information may be included in the event that some or all of our assets are sold, assigned or transferred in connection with a merger, acquisition, reorganization or sale of assets, or in the event of bankruptcy. As a general matter, however, an acquiring party cannot retroactively change the Privacy Policy that was in place when SUPERVISA collected your Personal Information.

3.6. Academic Research

We may share non-personally identifiable and non-privileged information about you and other users, in aggregate form, to third-party academic researchers. We require all third-party researchers to use such anonymized information for no purposes other than academic research. For example, we may use certain types of non-personally identifiable and non-privileged information to help researchers study factors that reduce barriers facing applicants navigating the immigration system. If you are in the EU, we will only share your non-privileged information with such academic researchers with your consent.

Policy Regarding Children

Our Site and Services are not intended for persons under 18 years of age, and we do not knowingly collect Personal Information from persons under 18 years of age. If you are a parent or guardian and believe that your child has provided us with Personal Information without your consent, please contact us at support@supervisa.ai. If we become aware that a person under 18 years of age has provided us with Personal Information, we will delete such information from our files.

EU Data Transfer and Individual Rights

5.1. Data Transfer Notice

We are located in Canada and transfer your personal data for processing in Canada. We make the transfer to Canada in the absence of an adequacy decision because it is necessary for the performance of a contract with you, or with your explicit consent.

5.2. Individual Rights

If you are located in the EU, you may use your account to access, correct, or change Personal Information that you have provided to us. You may also email us at support@supervisa.ai to request access to, transfer of, and rectification or erasure of your Personal Information or restriction of processing; and to object to processing. In the email, specify the nature of your request and the information that is the subject of your request. We will respond to your request within 30 days.

If we are processing your personal data based upon the lawful ground of your consent, you have the right to withdraw your consent for such processing at any time without affecting the lawfulness of the processing based on consent before it is withdrawn. To withdraw consent, email us at support@supervisa.ai.

Security

We have put in place physical, electronic and managerial procedures to protect the security of the information we collect, both during transmission and once received. This includes, but is not limited to, encryption, access control and audit logging on Personal Information. However, no method of transmission over the internet or method of storage is 100% secure. We cannot guarantee that our security measures will prevent our computer systems from being accessed illegally, nor can we guarantee that the information on our computer systems will not be viewed or stolen. ACCORDINGLY, SUPERVISA.AI DISCLAIMS ALL LIABILITY FOR THE THEFT, INTERCEPTION, LOSS, OR UNAUTHORIZED ACCESS TO DAMAGE TO YOUR INFORMATION. YOU ACKNOWLEDGE THAT USE OF THE SITE AND SERVICES IS AT YOUR OWN RISK.

Google Analytics

We use Google Analytics to collect information about use of the Site. Google Analytics collects information such as how often users visit the Site, what pages they visit when they do so, and what other websites they used prior to coming to the Site. We use the information we get from Google Analytics to improve the Site and Services. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other Personal Information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

Changes to Privacy Policy

SUPERVISA may make changes to this Privacy Policy at any time. If we make any material changes we will notify you via email (sent to the e-mail address specified in your account) or by posting the revised Privacy Policy on the Site prior to any changes becoming effective. You should review our Privacy Policy each time you access the Site or use the Services. Your continued use of the Site or Services following the posting of any changes or notice to you of the changes constitutes your agreement to such changes.

Retention of Personal Information

At a minimum, we will retain your Personal Information for as long as it may be needed to provide you Service and as needed to comply with our legal obligations. Unless you request deletion of your Personal Information sooner, we may hold any of your Personal Information which may be used to provide future Services for up to ten years. Upon request, SUPERVISA will inform you about whether we hold any of your Personal Information. You may terminate your account and request deletion of your Personal Information by contacting us at support@supervisa.ai. In some situations, we may be legally required to retain your Personal Information or for other reasons will not be able to comply with a request to delete data.