

Privacy Policy and Consent

Key information

- Providing your information is entirely optional, and is not related to, or required for, any other TMX product or service.
- The survey will ask you questions about your background and demographic traits, which some people consider sensitive. If you are not comfortable providing this information, do not proceed.
- In the future, the information you choose to provide and display on your profile may be viewed by businesses using TMX DOOR.

Introduction

This Privacy Policy and Consent (“Notice”) describes how and why TSX Inc. (“TMX”, “we”, “us”, or “our”) handles your personal information when you participate in, use, or otherwise interact with us connection with the TMX Director & Officer Open Registry (“TMX DOOR”).

This Notice specifically covers our handling of personal information and does not apply to anonymous or business information. In this Notice, “personal information” (sometimes referred to in some jurisdictions as “personal data”) means information about an identifiable individual.

TMX DOOR only seeks to comply with Canadian privacy law. Residents of the European Economic Area, the United Kingdom, Switzerland and California should review the specific sections for their region listed below.

When you participate in, use, or otherwise interact with TMX DOOR, you consent to the information handling practices described in this Privacy Policy.

Collection of personal information

Much of the personal information we collect comes directly from you, such as when you create an account or answer our survey questions. In rare cases, we may collect your personal information from a third party.

We may collect the following types of personal information:

- Contact information, such as your name, email, phone number, and address
- Demographic information voluntarily provided by you, such as age, gender, sexual orientation, race/ethnicity, visible minority status, Indigenous status, and neurodivergences or disabilities you may have
- Work, education, and professional experience information
- An image of government identification, which we use to verify your identity

- Usage information, such as when and how often you log onto your TMX DOOR account
- Online activity information collected from cookies and similar technologies, and device information, including hardware model, operating system version, preferred language, and unique identifiers
- Any other information you choose to provide us

Use of personal information

TMX is developing TMX DOOR as a database of current and potential (i.e. candidate) directors and officers. In the future, business users may be able to search for potential job candidates based on the information our individual users provide on their profiles. Individual names will not be made available on DOOR profiles.

In addition, we collect and use the information set out above to:

- Operate, monitor, and improve TMX DOOR, including by allowing business users to search for or browse individual user profiles
- Communicate with you and keep you updated on TMX DOOR and potential job opportunities (for example, we may notify you if a business user views your profile)
- Identify and authenticate you
- Personalize your experience
- Produce diversity- and demographic-related aggregated reports and statistics that do not directly identify individuals
- Provide you with information that you request from us, and to receive feedback from you
- Research and study demographic and diversity trends in corporate leadership
- To understand how you use TMX DOOR, including for data analytics, statistical analysis, internal business purposes, and product development purposes
- To manage our business and day-to-day business and operational needs
- Comply with any legal requirements, or protect our property, rights, or other interests

Cookies

We use cookies on our website. Cookies are essentially small packages of data stored on your internet browser that tell us about your browsing behaviour. We use that information to monitor usage of our website and improve it. We may also use this information to improve our marketing.

For more information on cookies and how to manage them, check the support pages for your browser, such as Firefox, Safari, Chrome or Internet Explorer.

Because of the rapidly changing state of technology, we cannot make any guarantees that our systems will be able to honour Do-Not-Track requests sent by your browser.

Sharing of personal information

We may share your information for four main reasons: (a) third party use of TMX DOOR (b) use by our affiliates and service providers; (c) legal purposes; and (d) for business purposes.

(a) Third party use of TMX DOOR

In the future, our business users may be able to search for the information individual users make available on their profiles for the purpose of identifying potential job candidates. Business users will not be provided with the individual user's name. We may permit business users to contact individual users through TMX DOOR. All users are solely responsible for their actions in connection with TMX DOOR, including their compliance with applicable privacy law.

(b) Affiliates and service providers

We may share your information with our affiliates and business partners to assist us in providing you services, perform functions on our behalf or for our internal business purposes. We may share diversity- and demographic-related aggregated reports and statistics with our affiliates for the purpose of operating, studying, and improving TMX DOOR. These reports do not directly identify any individual user.

We may also share your information with other organizations (e.g. service providers) that assist us in operating TMX DOOR or that provide us with other services. When we share information with service providers, we require them to commit to protecting your personal information in line with our standards, and limit use and disclosure of the information for the specific purposes for which we supplied it.

(c) Legal reasons

In rare circumstances, we may share your information about you if we reasonably believe that it is needed to:

- Comply with any valid legal process, governmental request, or applicable law, rule, or regulation
- Investigate, remedy, or enforce potential Terms of Service violations; protect the rights, property, and safety of us, our users, or others; or detect and resolve any fraud or security concerns

(d) Business reasons

We may share personal information with business partners where it is relevant to a business transaction, such as the sale of TMX or TMX DOOR to another company, as part of a corporate reorganization, or to pursue a partnership or investment opportunity.

Personal information handling practices

International transfers of information

TMX, service providers, and other third parties with whom we share information under this Notice may perform activities outside of the country, province, or other jurisdiction in which you reside. As a result, your information may be securely used, stored or accessed in other jurisdictions, including the United States, and may be subject to the laws of those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries.

Getting and withdrawing your consent

We only collect information by lawful means. As part of using TMX DOOR or interacting with us, we may collect and process some details about you. When we do so, we will collect, use or share your personal information with your consent for the purposes identified or as otherwise permitted or required by law. In compliance with our privacy obligations, we may obtain your permission based on implied consent (including through this Notice) or through other means (such as express consent). However, in some situations, the law allows us to collect, use or disclose personal information without your consent.

You can withdraw your consent to the collection, use or disclosure of your information at any time. However, in some cases withdrawing consent will mean that we can no longer provide you with certain services or perform certain tasks where the information is required to do so.

You may withdraw your consent to the collection, use or disclosure of your personal information at any time by contacting the Privacy Officer (see “Contact” below) and, subject to any legal constraints, we will comply with your request.

Data security

We protect your information by limiting access to it on a strict “need-to-know” basis, and we implement reasonable physical, organizational and technological safeguards as appropriate.

Retention

Except as otherwise permitted or required by applicable law, we will only retain your personal information as long as it is needed for one of the purposes identified above. We may de-identify or anonymize your information in accordance with applicable law, for example by removing identifiable information such as your name or email address. This information may be aggregated with other information and used for internal business purposes such as analytics and reporting.

Your rights and options

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if there are any changes to your personal information.

Depending on applicable law and the circumstances, you have the right to request:

- Access to, or transfer, your personal information accordance with applicable law
- Corrections or updates to your personal information

If you wish to update, correct, or access your personal information on your DOOR profile, you can do so at any time by logging onto the TMX DOOR portal and clicking “View and Edit your TMX DOOR Profile”.

If you wish to update, correct, or request access to your personal information that is unavailable on your DOOR profile, please contact us using the information under “Contact” below. Any such request must be provided to us in writing and may be subject to identity verification.

Additional information for European residents

If you are a European, in addition to the access and correction rights outlined above, you may be entitled, subject to certain conditions, to exercise some or all of the following additional rights:

- **Deletion.** The right to request that we delete your information.
- **Restrict processing.** The right to request that we limit or cease the processing of your information.
- **Portability.** The right to request that we transfer your information that we have collected to another organization or directly to you.

In order to exercise these rights, contact our Privacy Officer using the contact information outlined below.

Additional information for California residents

If you are a California resident, you can make certain requests regarding your personal information. We will fulfill each of these requests to the extent required by law.

- You can ask us what personal information we have about you, including a list of categories of your personal information that we have sold and a list of categories of your personal information that we have shared with another company for a business purpose.
- You can ask us to delete your personal information.
- You can ask that we stop selling your personal information.

In order to exercise these rights, contact our Privacy Officer using the contact information outlined below.

Contact

If you have any questions or concerns about this Notice or our handling of your personal information, including the bases for handling your personal information, please contact our Privacy Officer in writing, with the subject line “Privacy Request” at:

Email: tmxdoor@tmx.com

Please note that we may need to confirm your identity or request additional details in order to process your request.

Changes to this Notice

We may modify this Notice from time to time and will post the most current version online. If our privacy practices change in such a way that requires us to obtain consent, we will ask for it. If you disagree, we will tell you about any alternatives, including closing your account.