



# Privacy Policy

## Document Purpose

Protecting the privacy and confidentiality of personal information is an important aspect of the way SolutionInc Limited conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to SolutionInc Limited's daily operations.

SolutionInc Limited strives to protect and respect the personal information of its customers, employees, business partners, and so on, in accordance with all applicable regional and federal laws.

This Privacy Policy informs everyone of SolutionInc Limited's commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within SolutionInc Limited's possession and control.

## Personal Information

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, MAC social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information refers to: business name, business address, and business telephone number, name of owner, executive officer, and director, job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

## Who is SolutionInc Limited?

Over the last 20 years SolutionInc Limited has serviced kings, queens, prime ministers and presidents who have stayed in some of the most prestigious hotels in the world. The experience we have gained servicing these customers has best positioned us to serve customers and partners in today's explosive world of Wi-Fi.

Building on this experience, we have branched into markets beyond just hospitality. Our products & services have grown through experience and innovation to encompass all industries where people traverse and seek to get online. Working with our partners, including service providers, property owners and brand specialists, we collaboratively design, build, implement, manage, and support our customers business objectives and user experience expectations. By working together, we clearly understand their business and technical objectives, and we deliver.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- [support@solutioninc.com](mailto:support@solutioninc.com)
- 902-420-0077

The personal data we would like to collect from/process on you are:

<b>Personal data type:</b>	<b>Source</b>
Device MAC address	The SolutionInc Limited service will capture the data subject's "Device MAC address" as part of the authentication process and/or the data subject's MAC address may* be captured by the network infrastructure and processed to determine the data subject's network device's proximity to a network access point.
Device Assigned IP address	The SolutionInc Limited service will capture the data subject's Internet device "Device Assigned IP address" during the authentication process.
Device Bandwidth Usage	The SolutionInc Limited service records the amount of bandwidth the data subject's Internet device consumes during the duration they are using the service.
First Name	Data subject may* be requested to enter this information to verify they are a registered guest at a hotel property.
Last Name	Data subject may* be requested to enter this information to verify they are a registered guest at a hotel property.
Room Number	Data subject may* be requested to enter this information to verify they are a registered guest at a hotel property.
Email Address	Data subject may* be requested to enter an email address (non-verified) as a field in the registration process.
Facebook Token	Data subject may* be requested to enter Facebook credentials as a field in the registration process.

\*may – Depending on the venues business and authentication rules, the service may be configured to request and record this information.

The personal data we collect will be used for the following purposes:

- End user validation and authentication prior to being granted Internet access (in a hotel service, the data subjects name and room number may\* be used to grant them Internet service.
- Device Bandwidth usage is used to calculate how much bandwidth the data subject's device consumes while connected to the service.
- Email Addresses can be used by SolutionInc Limited's Customers for potential marketing campaigns.
- Facebook tokens can be used by SolutionInc Limited's Customers to grant access to the service using their Facebook profile information.

Our legal basis for processing for the personal data:

- Authentication and validating access to the service.
- Customer business models that wish to engage with the data subject.
- Usage patterns and performance metrics.

## Consent

Consent occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing SolutionInc Limited to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

Implied consent is granted by the individual when he/she signs an application form or agrees to the terms of use on a website or a welcome screen. This allows SolutionInc Limited to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

### 1.1 Consent

The consent of the data subject is one of the conditions for the processing of his or her personal data and is within the scope of this procedure. SolutionInc Limited needs to obtain consent when no other lawful basis applies.

Consent of the data subject is defined by the GDPR as "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".

Explicit consent is required for the processing of sensitive personal data. Specific conditions apply to the validity of consent given by children in relation to information society services, with requirements to obtain and verify parental consent below certain age limits.

By accepting the terms and conditions and connecting to the service you are consenting to this privacy notice and you are giving SolutionInc Limited permission to process your personal data specifically for the purposes identified.

You may withdraw consent at any time by emailing [support@solutioninc.com](mailto:support@solutioninc.com) with the subject line: "Request to withdraw consent". You will have to provide SolutionInc Limited with means of contacting you to verify your identity prior to executing your request.

## Collection of Information

SolutionInc Limited collects and uses personal information solely for the purpose of conducting business and developing an understanding of its customers. Information is collected in the following manners:

- Certain networks using our Service may require users to use login credentials. In connection with supporting this function, we may collect information such as MAC address and email address.
- SolutionInc Limited collects information for its clients and has no direct relationship with those individuals. If you no longer want to receive information from a SolutionInc Limited venue, please contact the venue that has sent you the information. The service may include having some information from your device collected. This information could include your browsers Internet Protocol (IP) address, MAC address, your browser type, the nature of the device you are using to connect.
- SolutionInc Limited obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how SolutionInc Limited uses personal information and will limit the use of any personal information collected only to what is needed for those stated purposes.

## Retention Period

SolutionInc Limited will process personal data for an indefinite period and will store the personal data for an indefinite period.

## Protection of Personal Information

- SolutionInc Limited vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. SolutionInc Limited maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.
- Access to personal information will be authorized only for the employees and other agents of SolutionInc Limited who require the information to perform their job duties, and to those otherwise authorized by law.
- SolutionInc Limited's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.
- Routers and servers connected to the Internet are protected by a firewall and are further protected by virus attacks or "snooping" by sufficient software solutions.
- SolutionInc Limited's Web site will include our privacy policy and disclose our personal information practices.
- While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information.

- Any registration or order form asking site visitors to enter personal or financial information will be protected by SSL encryption.
- Site visitors are given the choice to opt out of having their personal information used at the point where the information is gathered.

## Use of Information

SolutionInc Limited and its clients may use personal information without the individual's consent under particular circumstances. These situations may include, but are not limited to:

- SolutionInc Limited is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal law, under the purview of the appropriate authorities.
- An emergency exists that threatens an individual's life, health, or personal information.
- The personal information is for in-house statistical study or research.
- The personal information is already publicly available.
- Disclosure is required to investigate a breach of contract.
- SolutionInc Limited may share compiled demographic information with its business partners and/or advertisers.
- SolutionInc Limited will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

If you receive commercial emails direct from SolutionInc Limited, you may unsubscribe at any time by following the instructions in the email. If you receive commercial emails from one of our clients, they are responsible for adhering to privacy law requirements.

## Contact Information

Any questions or concerns regarding this Privacy Policy can be addressed by contacting us at [info@solutioninc.com](mailto:info@solutioninc.com). SolutionInc Limited will investigate and respond to concerns about any aspect of the handling of personal information.

This Website and/or Welcome screen may contain links to other websites; SolutionInc Limited is not responsible for the privacy practices of other organizations' sites.

### 1.2 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by SolutionInc Limited or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and SolutionInc Limited's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>[Data Protection Officer (DPO)] / [GDPR Owner] contact details</b>
<b>Contact Name:</b>	Manager of Support	Manager of Support
<b>Address line 1:</b>	5692 Bloomfield Street	5692 Bloomfield Street
<b>Address line 2:</b>	Halifax, Nova Scotia	Halifax, Nova Scotia
<b>Address line 3:</b>	Canada, B3K 1T2	Canada, B3K 1T2
<b>Email:</b>	support@solutioninc.com	support@solutioninc.com
<b>Telephone:</b>	902-420-0077	902-420-0077

### 1.3 Your rights as a data subject

At any point while SolutionInc Limited is in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review – in the event that SolutionInc Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

## 2. Online privacy statement

Personal data Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### How we use your information

This privacy notice tells you how we, SolutionInc Limited, will collect and use your personal data for cookies, profiling, validating access to the service, and some customers (third party) may use this data for marketing purposes.

### Why does SolutionInc Limited need to collect and store personal data?

In order for us to provide you with public Wi-Fi services, we need to collect personal data for authentication to access the service and maintain system metrics]. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes SolutionInc Limited would contact you for additional consent or explicit consent would be requested as part of registering to use the service.

### Will SolutionInc Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to SolutionInc Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with SolutionInc Limited's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will SolutionInc Limited use the personal data it collects about me?

SolutionInc Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. SolutionInc Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will SolutionInc Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organization holds about me?

SolutionInc Limited at your request, can confirm what information we hold about you and how it is processed. If SolutionInc Limited does hold personal data about you, you can request the following information, this information will be provided to you within 30 days of your request:

- Identity and the contact details of the person or organization that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of SolutionInc Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organization information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

SolutionInc Limited accepts the following forms of ID when information on your personal data is requested: The data subject will be required to provide their name, email address, device MAC address, dates/times when they accessed the service.

SolutionInc Limited will verify this data and communicate with the data subject prior to releasing any information. [Passport, driving license, birth certificate, utility bill (from last 3 months), etc.]

Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Dave Graham
Address line 1:	5692 Bloomfield Street
Address line 2:	Halifax, NS
Address line 3:	Canada, B3K 1T2
Email:	<a href="mailto:support@solutioninc.com">support@solutioninc.com</a>
Telephone:	902-420-0077

Document Owner and Approval

The Manager of Support is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the [SolutionInc Limited intranet] and is published August 2018.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Karen Saunders	September 2018
2	Review and Approval	Karen Saunders	October 2018

