# **Privacy Policy**

Effective Date: September 13, 2019

ruby Corp. (collectively, "**ruby**", "**we**", "**our**") pride ourselves on our privacy practices. We are committed to being transparent about the personal information we collect, the manner in which such personal information is used by us and the limited circumstances in which some personal information may be disclosed. This Privacy Policy describes how we collect, use, disclose and secure the personal information you provide to us through www.rubylife.com (the "Site"). It also describes your choices regarding use, access and correction of your personal information. Please note that this Privacy Policy only governs personal information collected through the Site and does not apply to any of ruby's dating sites including Ashley Madison, Established Men or CougarLife.

#### Meaning of Personal Information

For the purposes of this Privacy Policy, "personal information" means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization when collected, used or disclosed solely for the purpose of communicating or facilitating communication with the individual in relation to their employment, business or profession.

#### The Personal Information We Collect

Except as otherwise provided in this Privacy Policy, the personal information we collect from you is comprised entirely of the information you provide to us through the Site. Specifically, we may collect your name and email address when you submit a question or comment to us ("Query PI"). In addition, we may collect your name, address and any other information you submit to us when applying for a job with us (including your employment history and any other information contained on your resume or CV which you submit to us) (collectively, "Applicant PI").

We may collect personal information through use of cookies and other tracking devices - for further details see Annex A.

### How We Use Your Personal Information

We may use your personal information for the following purposes:

- (a) with respect to Query PI, we will only use your personal information to respond to your question(s) or comment(s) and as otherwise required by applicable law; and
- (b) with respect to Applicant PI, we will only use your personal information: (i) in connection with assessing your application, (ii) for communicating with you about your application, (iii) for administering the application process, and (iv) as required

by applicable law. In the event you are hired by ruby as an employee, any personal information collected in connection with your application will be subject to our employee privacy policy.

## How We Disclose Your Personal Information

We will not disclose any personal information we collect from you to any third parties except as follows:

- (a) Affiliates within our Corporate Group. Many of the services we offer are provided in conjunction with our affiliates ruby Life Inc. and Praecellens Limited. As such, we may disclose your personal information to our affiliates.
- (b) **Service Providers and Partners.** We may disclose your personal information to our service providers which perform certain services necessary to run our business (for example, data hosting).
- (c) **Legal Request.** We may disclose your personal information to respond to law enforcement requests; or where required by applicable laws, court orders, or government regulations.

## **Protecting Your Personal Information**

We take the protection of your personal information seriously. We make reasonable efforts to prevent unauthorized use, disclosure, loss or theft of your personal information. Employees who have access to your personal information are made aware of the importance of keeping it confidential.

Where we use service providers who might have access to your personal information, we select them carefully and require them to have privacy and security standards that are comparable to ours. We use contracts and other measures with our service providers to maintain the confidentiality and security of your personal information and to prevent such information from being used for any other purpose.

Our operations are global. As a result, your personal information may be used, stored and/ or accessed in countries outside of Canada, including the United States. However, all such information will be protected in accordance with this Privacy Policy. Please note that when your personal information is located outside of Canada it will be subject to the laws of the country in which it is situated.

### **Retaining Your Personal Information**

We will only retain your personal information as long as is necessary for the fulfillment of the purposes for which it was collected or as required by law.

# **Keeping Your Information Updated**

We do not update any personal information we collect from you unless necessary for the purposes for which it was collected. In the event it is necessary to update your personal information for the purposes for which it was collected, we will contact you to provide such updated information. You may also contact us to update your personal information.

### Accessing Your Information and Addressing Your Privacy Concerns

Subject to certain exceptions prescribed by applicable law, you may have the right to access personal information we hold about you and to have any concerns you may have over our policies and practices addressed. In addition, you may have the right to obtain information regarding our policies and practices with respect to our use of service providers outside Canada. To access your information, discuss your concerns or learn more about our policies and practices please see our contact information in the "How to Contact Us" section below.

# **Updates to this Privacy Policy**

This Privacy Policy or our other privacy related documents will be updated from time to time. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes to this Privacy Policy.

## How to Contact Us

If you have any questions related to our practices with respect to the collection, use or disclosure of personal information, if you wish complain to us in writing about how we have handled your personal information, please feel free to contact our Privacy Officer at privacyofficer@rubylife.com.

# Annex A – Information Collected by the Site through Cookies and other Tracking Devices

The Site may use cookies and other tracking devices, as described below, to collect information automatically. We and our third-party partners and vendors use these devices to facilitate access and use of the Site, improve the performance of the Site, understand the activities of Site visitors, identify patterns in Site usage, remember you as a previous user and your previously set preferences, and gain information about your internet browsing habits. We may also use cookies to associate you with your account profile.

**Cookies.** Cookies are small pieces of information that a website transfers to your computer. Our Site may use session ID cookies (expire when you close the browser) and persistent cookies (persist even after you close the browser), which help our Site run more smoothly and tailor content for you. Most web browsers have options that allow you to control whether or not to accept cookies and give you the option to delete all cookies. However, please note that disabling cookies in your browser may prevent access to some parts of our Site.

**Do Not Track Signals:** Our Site is not currently configured to respond to a browser's Do Not Track signals.

**Google Analytics.** The information generated by the cookie about your use of the Site will be transmitted to and stored by Google on servers in the United States. Google's Privacy Notice is located at http://www.google.com/analytics/learn/privacy.html. Google Analytics is used with the expansion '\_anonymizeIp()'; therefore, only abbreviated IP addresses will be processed to prevent a direct connection to the individual user. You may prevent the use of Google Analytics by disabling cookies in the browser's set up screen. You may prevent Google from recording the data generated by the cookie and pertaining to your use of the website (including your IP address), or processing these data by downloading and installing the following browser plug-in available through Google at the following link: http://tools.google.com/dlpage/gaoptout?hl=en.

**Device IDs.** We may collect and store a unique device ID associated with your particular device to track the number of unique visitors using our Site and to enable you to interact with and use our Site. We link your device ID with the technical information accessed through your use of our Site for the uses described in this Privacy Policy.

**Clear Gifs (Web Beacons/Web Bugs).** Our Site may employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), which helps us to better manage content on our Site by informing us what content is viewed or clicked on. Clear gifs are tiny graphics with a unique identifier.

By using the Site, you agree to the use of cookies and other tracking devices as described above. You may configure your Internet browser to notify you when a cookie is sent (giving you the option to decide whether to accept it or not) and to reject or remove cookies. To remove cookies, please follow your browser's instructions or contact your browser provider for more information. By removing or refusing to accept cookies, you may be unable to use or access some features of our Site.