

PRIVACY POLICY

Absolute Software (“**Absolute**”, “**we**”, “**us**” or “**our**”) is committed to respecting and protecting your privacy and wants you to feel secure when visiting our website (the “**Website**”) and using our services (the “**Services**”). This Privacy Policy sets out our policies concerning the collection, use, and disclosure of personal information we receive from your use of the Website or the Services.

All personal information held or collected by Absolute is protected by either the Federal *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) or the British Columbia *Personal Information Protection Act* (the “**PIPA**”). “Personal information” means all information about an identifiable individual.

Unless otherwise agreed to in writing by Absolute, by using the Website or the Services you are consenting to the terms and conditions set forth in this Privacy Policy, including without limitation, the collection, use and disclosure of your personal information by Absolute as outlined below. **IF YOU ARE NOT IN AGREEMENT WITH THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, DO NOT SUBMIT ANY OF YOUR PERSONAL INFORMATION.**

Absolute may update this Privacy Policy from time to time without notice to you, therefore it is your responsibility to periodically review this Website for the most current version. If this Privacy Policy is updated, your continued use of this Website or the Services and any subsequent submission of personal information by you will be deemed your conclusive acceptance of the most recent version of this Privacy Policy.

Collection of Personal Information

Absolute will only collect personal information for the following reasons:

- to develop, manage and deliver our products and the Services to our customers;
- to contact our customers, either directly or through one of our resellers, to offer them the option to renew the Services;
- to contact our customers directly about products and services that may be of interest;
- to ensure high standards of service to customers;
- to contact customers with product and service updates, upgrades and enhancements;
- to meet regulatory requirements; and
- to verify a customer’s identity.

Absolute will try to collect personal information directly from the individual concerned unless authorized by that individual to collect it from a third party or as otherwise permitted by law. We will only collect personal information through lawful methods and we will not collect information indiscriminately.

The Services

Absolute’s products and services help keep assets safe and secure and our products are designed to help protect your privacy. Using a very small software agent, our products allow your computer to call into our confidential and secure monitoring center on a regular basis and transmit to our servers certain information relating to your computer (including IP address, computer name, user name, list of hardware and installed software). With your consent and participation, certain of our products may also collect additional asset-related information for certain other purposes designated by you, such as hardware/software inventory, lease management, PC migration and software license compliance.

If you report your computer as lost or stolen, with your consent we may collect further information from the lost or stolen computer in order to determine its location. Once we have gathered sufficient information to determine its location, we may compile such information and deliver it to a law enforcement agency having jurisdiction over the individual in possession of the lost or stolen computer. The law enforcement agency may then use this information to attempt to recover the lost or stolen computer.

The Website

Absolute may use cookies to enable you to more easily sign in to our website. "Cookies" are small data files created by a web server that recognize repeat visitors to a website. Cookies cannot be used to run programs or deliver viruses to your computer. You have the option of setting your internet browser settings to ensure that cookies are not placed on your hard drive.

Absolute may monitor Website usage and traffic patterns in order to optimize our Website design and content.

Absolute's website may contain links to third party sites and we recommend and encourage you to read the privacy policies posted on the third party sites. Absolute is not responsible for the privacy policies of any third party.

Consent

Absolute will obtain your consent before collecting, using or disclosing your personal information for any purpose other than as identified in this Privacy Policy. We will make reasonable efforts to ensure you understand how your personal information may be used or disclosed. Your consent may be provided to Absolute orally, in writing or electronically, either personally or through an authorized individual. You may withdraw or refuse to provide your consent to Absolute by giving reasonable notice. However, any such withdrawal or refusal of consent may prevent Absolute from providing you with the Services.

Use, Disclosure and Retention

Absolute will only use and disclose personal information for the purposes for which it was collected or as required or permitted by law. Before we use or disclose your personal information for any other purpose we will obtain your consent.

Absolute will retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required for legal or business purposes. Any personal information you provide to us will be destroyed, deleted or made anonymous once your account has been inactive for two years.

Safeguarding Personal Information

Absolute takes all reasonable precautions to ensure that all personal information under our control is properly safeguarded against unauthorized access, use, disclosure, duplication or modification. We use security safeguards that are appropriate to the sensitivity of the personal information, which may include physical security (in offices and data centers) and electronic security measures such as access control systems, passwords and encryption software. We also use secure data networks protected by firewalls meeting industry standards

Requests for Access to and Correction of Personal Information

You have the right to access and/or request the correction of errors or omissions in your personal information. Absolute's Privacy Officer will assist you with your request. This includes:

- Identification of personal information under Absolute's custody or control.
- Information about how your personal information may be or has been used by Absolute.
- The names of any individuals and organizations to which your personal information has been disclosed by Absolute.

We will respond to written requests (which may be made by fax or email) within thirty (30) days of receiving such request. If Absolute cannot provide a copy of your personal information, you will be provided with a response in writing that documents the reason for refusal.

Accountability and Responsibility

Absolute is accountable for the protection of all personal information under our control. The responsibility of ensuring compliance with policies and practices set forth in this Privacy Policy has been assigned to a "Privacy Officer". All questions, access to personal information, and complaints may be directed as follows: Privacy Officer, Absolute Software Corporation, Suite 1600, Four Bentall Centre 1055 Dunsmuir Street Vancouver B.C. V7X 1K8 Tel: 604.730.9851 Fax: 604.730.2621 E-mail: privacy@absolute.com.

If you are a corporate customer or any other type of organization, you are responsible for the legal collection and use of personal information of individuals within your organization in accordance with the principles set out in your privacy policy and the applicable laws in the countries in which you operate.

If the Absolute Privacy Officer is unable to address your concerns, the issue may be escalated to the office of the CEO. At any point, you may also contact the BC Privacy Commissioner.