

# Stannp Privacy and Cookies Policy

This Privacy and Cookies Policy (the "**Policy**") applies to **Stannp Direct Mail SaaS Incorporated**, an Ontario corporation with its principal office at **2727 Steeles Avenue West, Suite 1032, North York, Ontario, M3J3G9** ("**Stannp**," "**we**," "**us**," or "**our**"). This Policy describes how we collect, use, share, and protect personal information when you visit our website at [stannp.com](https://stannp.com) (the "**Website**") or use our direct mail platform and services (the "**Platform**" or "**Services**").

## About Our Services

Stannp provides a direct mail platform that enables businesses to create, manage, and send physical mail campaigns through a fully digital, integrated solution. We collect and process personal information as necessary to deliver these direct mail services to our business customers and their recipients.

## Your Acceptance of This Policy

Please read this Policy carefully to understand our policies and practices for collecting, processing, storing, using and disclosing information. By creating an account, accessing or using our Website, Platform, or Services in any manner, or otherwise providing us with personal information, you acknowledge that you have read and understood this Policy and agree to the collection, use, and disclosure of personal information as described herein.

As a condition of registering for and using the Platform, users are required to review and accept the Terms of Service and acknowledge this Policy prior to account creation. If you do not agree with this Policy, you must not access or use our Website, Platform, or Services or otherwise provide us with personal information.

We will only collect, use, and disclose personal information in accordance with this Policy and applicable Canadian privacy legislation. We take reasonable steps to ensure that the personal information we collect is accurate, complete, and not excessive for the purposes for which it is used.

**This Policy was last updated on: 12<sup>th</sup> July 2026**

## 1. Application and Accountability

This Policy applies to all individuals who interact with Stannp in any capacity, including through our Website, Platform, Services or otherwise in the course of our commercial activities.

This Policy is incorporated into, and subject to, our terms of service (the "**Terms of Service**") which can be found at [www.stannp.com/ca/terms-of-service](https://www.stannp.com/ca/terms-of-service). Any capitalized terms used but not defined in this Policy take the meaning ascribed in our Terms of Service.

This Policy does not apply to information collected by means other than through our Website, Platform, Services or otherwise in the course of our commercial activities, including on other company or third-party websites (even those of our affiliates or subsidiaries), or information that you provide to, or that is collected by, any third party (including our affiliates or subsidiaries) through applications or content that may link to or be accessible from our Website, Platform, or Services.

For the purposes of Canadian privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws (Alberta's Personal Information Protection Act, British Columbia's Personal Information Protection Act), Stannp acts as an Organization collecting, using, and disclosing personal information about its own customers, prospective customers, and employees in the course of commercial activities. Where Stannp processes personal information on behalf of its business customers in connection with their mailing campaigns, Stannp acts solely as a service provider and is not an Organization in respect of that personal information. In those circumstances, Stannp's customers remain the Organizations responsible for compliance with applicable privacy laws.

### **Notice at Collection**

At or before the time personal information is collected, we make available information to individuals regarding:

- the purposes for which personal information is collected;
- the means by which it is collected;
- the rights of access, correction, and withdrawal of consent available to them;
- the possibility that personal information may be communicated outside Canada; and
- the categories of persons who may have access to the information.

This information is provided through this Policy and related privacy notices made available at the time of collection. Additional information about our privacy practices may be obtained by contacting our Privacy Officer.

We have designated a Privacy Officer, whose contact information is listed below, and who is accountable for our compliance with Canadian privacy laws.

### **Legal Basis for Collection**

We collect, use, and disclose personal information with consent, except where otherwise permitted or required by law. We obtain express consent for sensitive information and for non-essential cookies. You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

When you provide us with personal information about others, you represent that you have obtained necessary consents to share it with us.

## 2. Information We Collect and Use

We collect and process the following information from you via the Platform:

| Category of Information                      | Examples                                                                                                                                                                 | Sources                                                                                                                                                                   | Business/ Commercial Purpose                                                                                                                                                                                          | Disclosed to                                                                                                                                                                                      |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identifiers &amp; Contact Information</b> | First name, last name, email address, business address, phone number, company name, job title                                                                            | <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Third party data providers</li> </ul>                                                               | <ul style="list-style-type: none"> <li>• Account creation and management</li> <li>• Customer service</li> <li>• Billing and payments</li> <li>• Marketing communications</li> <li>• Legal compliance</li> </ul>       | <ul style="list-style-type: none"> <li>• Service providers</li> <li>• Payment processors</li> <li>• Marketing partners (with consent)</li> <li>• Legal authorities (if required)</li> </ul>       |
| <b>Financial Information</b>                 | Credit card details, billing address, payment history                                                                                                                    | <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Payment processors</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>• Payment processing</li> <li>• Fraud prevention</li> <li>• Account administration</li> <li>• Legal and tax compliance</li> </ul>                                              | <ul style="list-style-type: none"> <li>• Payment processors</li> <li>• Financial institutions</li> <li>• Legal authorities (if required)</li> </ul>                                               |
| <b>Commercial Information</b>                | Purchase history, account usage, service preferences                                                                                                                     | <ul style="list-style-type: none"> <li>• Your use of our Platform</li> </ul>                                                                                              | <ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Account personalization</li> <li>• Product improvement</li> <li>• Analytics</li> </ul>                                                           | <ul style="list-style-type: none"> <li>• Service providers</li> <li>• Analytics providers</li> </ul>                                                                                              |
| <b>Internet/ Network Activity</b>            | IP address, browser type, device information, operating system, cookies, usage data                                                                                      | <ul style="list-style-type: none"> <li>• Automatically collected via Website/Platform</li> </ul>                                                                          | <ul style="list-style-type: none"> <li>• Platform functionality</li> <li>• Security and fraud prevention</li> <li>• Analytics and improvement</li> <li>• Troubleshooting</li> </ul>                                   | <ul style="list-style-type: none"> <li>• Hosting providers</li> <li>• Security services</li> <li>• Analytics providers</li> </ul>                                                                 |
| <b>Professional Information</b>              | Company name, job title, business contact details                                                                                                                        | <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Third party data providers</li> </ul>                                                               | <ul style="list-style-type: none"> <li>• B2B communications</li> <li>• Service customization</li> <li>• Marketing (where permitted)</li> </ul>                                                                        | <ul style="list-style-type: none"> <li>• Service providers</li> <li>• Marketing partners (with consent)</li> </ul>                                                                                |
| <b>Customer Support Data</b>                 | Support tickets, issue descriptions, communications with support team                                                                                                    | <ul style="list-style-type: none"> <li>• Directly from you</li> </ul>                                                                                                     | <ul style="list-style-type: none"> <li>• Issue resolution</li> <li>• Service improvement</li> <li>• Training and quality assurance</li> </ul>                                                                         | <ul style="list-style-type: none"> <li>• Customer support platforms</li> <li>• Service providers</li> </ul>                                                                                       |
| <b>Preferences &amp; Settings</b>            | Dashboard configuration, communication preferences, marketing opt-in/opt-out choices                                                                                     | <ul style="list-style-type: none"> <li>• Directly from you</li> </ul>                                                                                                     | <ul style="list-style-type: none"> <li>• Service customization</li> <li>• Compliance with preferences</li> <li>• User experience improvement</li> </ul>                                                               | <ul style="list-style-type: none"> <li>• Service providers</li> </ul>                                                                                                                             |
| <b>Employment Application Data</b>           | Name, contact details, resume, education history, employment history, references, interview notes, background check results (where permitted), work authorization status | <ul style="list-style-type: none"> <li>• Directly from applicants</li> <li>• Recruitment platforms</li> <li>• Background check providers</li> <li>• References</li> </ul> | <ul style="list-style-type: none"> <li>• Evaluating qualifications</li> <li>• Conducting interviews</li> <li>• Background verification</li> <li>• Legal compliance</li> <li>• Equal opportunity monitoring</li> </ul> | <ul style="list-style-type: none"> <li>• HR service providers</li> <li>• Background check services</li> <li>• Payroll processors (if hired)</li> <li>• Legal authorities (if required)</li> </ul> |



### Limiting Collection

We limit our collection of personal information to what is reasonably necessary to fulfil the identified purposes. We collect personal information by fair and lawful means.

### Sensitive Information

We do not intentionally collect sensitive personal information unless required for a specific lawful purpose and with express consent. Sensitive information may include government-issued identification numbers, financial account access credentials, precise geolocation data, or other information that could reasonably create a higher risk of harm if misused.

### Profiling and Personalization

We may use personal information to analyze preferences, usage patterns, and interactions with our Website or Platform in order to improve functionality, personalize user experience, and optimize our Services. Such activities may constitute profiling under applicable privacy legislation.

Individuals may object to certain uses of their personal information or withdraw consent where permitted by law by contacting our Privacy Officer.

### Marketing Communications and CASL Compliance

For commercial electronic messages, we comply with Canada's Anti-Spam Legislation (CASL):

- We only send commercial messages with your express or implied consent
- All marketing communications include our identity and contact information
- Every message includes an unsubscribe mechanism
- Unsubscribe requests are processed within 10 business days

To opt out of marketing emails, click the unsubscribe link in any email or contact us.

### Use of Aggregated or Anonymized Customer Data

We may use aggregated, anonymized data for purposes such as improving the Website, Platform, Services, analytics, benchmarking, and reporting on trends. This data does not identify individual recipients or disclose personal information. We do not use customer-provided personal information for product training, marketing to third parties, or any other purposes outside of the agreed Services without explicit consent.



### 3. Data Processing for our Customers

When you use our Platform to send mailings to your customers, you remain the organization responsible for complying with applicable privacy laws in respect of that personal information. In those circumstances, Stannp acts as a service provider and processes personal information solely on your instructions and in accordance with applicable law.

#### Data We Process on Your Behalf

| Category of Information        | Examples                                                                            | Sources                                                                           | Business/ Commercial Purpose                                                                                                              |
|--------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Recipient Data</b>          | Names, addresses, email addresses, phone numbers, and other identifiers you provide | To fulfil your mailing campaigns through printing, mailing, and delivery tracking | You must ensure compliance with CASL (for electronic messages), PIPEDA, applicable provincial privacy laws, and obtain necessary consents |
| <b>Campaign Content</b>        | Marketing materials, letters, personalization fields, images, and variable data     | To produce and deliver your mailings                                              | You are responsible for content compliance and accuracy                                                                                   |
| <b>Your Uploaded Databases</b> | CRM exports, suppression lists, custom data fields                                  | To store for future campaigns and apply suppressions                              | You control retention and must ensure data accuracy                                                                                       |
| <b>Campaign Analytics</b>      | Delivery confirmations, response tracking, QR code scans (if enabled)               | To provide performance reports                                                    | You determine how to use analytics for future targeting                                                                                   |

#### Your Obligations as the Organization

As the organization/controller, you are responsible for:

- Obtaining and maintaining valid consent from all recipients
- Providing privacy notices to your recipients
- Responding to access requests and complaints from your recipients
- Ensuring CASL compliance for all electronic communications
- Maintaining accurate suppression lists
- Ensuring compliance with PIPEDA and applicable provincial privacy laws
- Verifying lawful authority to use any third-party data

You are responsible for maintaining suppression lists for your mailing campaigns. Stannp does not maintain or share a global suppression list across its clients. You must ensure that all suppression data uploaded to the Platform is accurate and that recipients have provided valid consent, in accordance with PIPEDA and applicable provincial privacy laws. Stannp does not independently verify the legality or accuracy of recipient data; you are solely responsible for ensuring that all personal information provided for mailing campaigns is lawfully obtained and used.



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## 4. Use, Disclosure, and Retention of Personal Information

### Use of Information

We only use personal information for the purposes for which it was collected, unless:

- We obtain your consent for a new use
- The new use is required by law
- The new use is clearly related to the original purpose

### Disclosure to Third Parties

We may disclose your personal information to:

- Service providers who assist us in operating our business (under strict confidentiality agreements)
- Payment processors for billing purposes
- Canada Post and delivery partners for mail fulfilment
- Professional advisors (lawyers, accountants, auditors)
- Government authorities when required by law
- Potential purchasers in connection with a business transaction
- Other parties with your consent

### Sub-Processors

We engage certain trusted third parties to assist in delivering our Services (“**sub-processors**”). These sub-processors may process personal information on our behalf for limited and specific purposes such as hosting, printing and mailing, payment processing, analytics, customer support, and security.

A current list of our sub-processors, including their names, locations of processing, and the nature of the services they provide, is available [here](#) (“**Sub-Processor List**”). We update this list whenever we add, replace, or remove a sub-processor.

Before engaging any new sub-processor, we perform due diligence and ensure that the sub-processor is bound by contractual terms that require it to protect personal information to standards comparable to those required under Canadian privacy laws (including PIPEDA and applicable provincial laws).

Where required by law, we will provide advance notice of new sub-processors and give you an opportunity to object to their engagement if you are a business customer.

We take contractual steps to ensure sub-processors protect personal information to standards comparable to those required under applicable Canadian privacy legislation. We are not responsible for the acts or omissions of sub-processors beyond our reasonable contractual oversight obligations.

### International Transfers

**Important Notice:** We primarily store personal information on servers located in Canada. However, certain processing activities may occur outside Canada, including access by our UK-based personnel for support and operational purposes. In such cases, your information:

[www.stannp.com](http://www.stannp.com)



**Stannp Inc.**

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- Will be subject to UK and US privacy laws include safeguards that are generally aligned with internationally recognized privacy standards
- May be accessible to UK government authorities under UK laws or the US government authorities under US laws
- Will continue to be protected by our security measures and contractual agreements
- Remains subject to Canadian privacy law and your rights under PIPEDA and applicable provincial legislation

**Comparable Level of Protection:** We ensure that all personal information transferred outside of Canada receives a comparable level of protection to that required under Canadian privacy laws through appropriate contractual safeguards, security measures, and oversight. Our service providers and partners are contractually required to protect personal information to standards consistent with PIPEDA requirements.

## Retention

We retain your data for no longer than is reasonable in line with the purposes for which it was originally collected. Retention periods are determined based on the nature of the information, the purposes for which it was collected, legal requirements, and legitimate business needs.

### Specific Retention Periods:

- Account information: Retained while your account is active and for 3 years after account closure
- Payment records and invoices: 7 years (tax and legal compliance)
- Marketing communications data: Until you unsubscribe or 3 years of inactivity
- Customer campaign data (as processor): Retained according to your instructions and settings
- Customer support tickets: 3 years after resolution
- Employment application data: 1 year after hiring decision

You may request deletion of personal information, subject to legal retention obligations and our legitimate business requirements, however, please note that any personal data appearing on sales invoices will be retained by Stannp for at least 7 years for legal compliance.

Personal information is securely destroyed, erased, or anonymized when no longer needed.

## 5. Safeguarding Personal Information

We protect personal information with security safeguards appropriate to the sensitivity of the information.

### Technical Safeguards

Our technical security measures include encryption of personal data both in transit and at rest. We implement access controls to restrict data access to authorized personnel only. Our systems undergo regular security monitoring, supported by network security infrastructure including firewalls and intrusion detection systems.

### Physical Safeguards

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Physical security protections encompass secure data centers with restricted access controls and secure procedures for disposal of physical media containing personal information. Access to facilities housing personal data is controlled and monitored.

#### Administrative Safeguards

Administrative safeguards include employee security training, regular reviews and updates of security policies and procedures, established incident response and breach notification procedures, and security assessments of vendors and contractors who may access personal information.

We maintain these security measures in accordance with applicable Canadian privacy laws and industry standards. However, while we use commercially reasonable safeguards, no method of transmission over the Internet or method of electronic storage is completely secure. We cannot guarantee absolute security. Individuals seeking additional information about our specific safeguards may contact us using the information in Section 14 below.

#### Payment Card Security

We do not directly store or process full payment card numbers on our systems. All payment transactions are handled securely by PCI DSS-compliant payment processors. These processors are contractually required to maintain strict safeguards in accordance with the Payment Card Industry Data Security Standard (PCI DSS) to protect your financial information.

#### Data Breach Notification

In the event of a breach of security safeguards involving personal information that creates a real risk of significant harm, we will notify affected individuals without unreasonable delay, report to the Privacy Commissioner of Canada, and maintain records of all breaches as required by law.

*“Real risk of significant harm” includes situations that could reasonably result in identity theft, fraud, financial loss, damage to reputation, or damage to employment prospects.*

Breach notifications will include:

- Description of the breach and affected information
- Date or time period of the breach
- Steps we have taken to reduce risk of harm
- Steps you can take to protect yourself
- Our contact information for questions



## 6. Cookies and Similar Technologies

### What are Cookies?

Cookies are small text files that are placed on your device when you use the Website or Platform. Session cookies enable you to move from page to page within the Website and Platform and any information you enter will be remembered but is deleted when you close the page or after a short time. Persistent cookies allow us to remember your preferences and settings when you use the Website or Platform in the future.

### Types of Cookies We Use

| Cookie Type                                     | Purposes                                                                                                                                                                                                                                     | Examples                                                                                                                            |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <b>Strictly Necessary Cookies</b>               | <ul style="list-style-type: none"> <li>• Authentication tokens to keep you logged in</li> <li>• Dashboard configuration preferences</li> <li>• Security and fraud prevention</li> <li>• Load balancing and platform functionality</li> </ul> | Essential for Platform operation                                                                                                    |
| <b>Analytics Cookies</b><br>(with your consent) | <ul style="list-style-type: none"> <li>• Understanding how visitors use our site</li> <li>• Tracking if advertising or referral links were effective</li> <li>• Analyzing user behavior to improve Platform functionality</li> </ul>         | <ul style="list-style-type: none"> <li>• Google Analytics</li> <li>• Referrer tracking</li> <li>• User behavior tracking</li> </ul> |
| <b>Marketing Cookies</b><br>(with your consent) | <ul style="list-style-type: none"> <li>• Advertising optimization</li> <li>• Marketing campaign effectiveness</li> <li>• Showing relevant advertisements</li> </ul>                                                                          | <ul style="list-style-type: none"> <li>• Google Adwords</li> <li>• Hubspot</li> <li>• Retargeting cookies</li> </ul>                |

### Managing Your Cookie Preferences

You can control cookie settings through our cookie consent banner when you first visit our website, your account settings if you're a logged-in user, or directly through your browser settings. If you do not want cookies to be served on your device, you can disable them through these settings; however, please note that disabling necessary cookies may prevent you from accessing some Platform features.

### Third Party Cookies

Third party advertisers may place or read cookies on your browser when you use our website or Platform. This Policy applies only to Stannp's use of cookies and does not cover third party cookies. For more information about managing cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

At this time, our Website does not respond to browser-based "Do Not Track" signals.

## 7. Your Privacy Rights

Under PIPEDA and applicable provincial laws, you have the following rights:

### Access Rights

You have the right to request access to your personal information and receive information about how we use and disclose your data. You can also request to know what third parties have received your information.



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## Correction Rights

You can request correction of inaccurate or incomplete information. If we refuse a correction, you may add a statement of disagreement to your file.

## Consent Rights

You may withdraw consent for collection, use, or disclosure at any time, subject to legal or contractual restrictions. You can opt out of marketing communications at any time. You also have the right to refuse to provide personal information, though this may affect service delivery.

## How to Exercise Your Rights

Submit requests to our Privacy Officer at [privacy@stannp.com](mailto:privacy@stannp.com), by phone at 647-475-2099, or by mail to Privacy Officer, Stannp Direct Mail SaaS Incorporated, 2727 Steeles Avenue West, Suite 1032, North York, Ontario, Canada M3J3G9.

## Our Response Timeline

We will provide a substantive response within 30 days as required by Canadian privacy law. For complex requests, we may extend this timeline by an additional 30 days with written notice explaining the reason for the extension. There is no fee unless your request is repetitive or manifestly unfounded.

## Verification Process

We verify identity before processing requests by matching information against our records and requesting additional verification if needed. We use appropriate verification based on the sensitivity of the request.

## Authorized Representatives

To designate someone to act on your behalf, provide written authorization signed by you and proof of the representative's identity.

## 8. Automated Decision-Making

We do not make significant decisions about you based solely on automated processing of your personal information. If we implement automated decision-making that produces legal or similarly significant effects, individuals will be informed at or before the time such processing occurs and will have an opportunity to request human review. If we implement automated decision-making that produces legal effects or similarly significant effects, we will notify you and provide an opportunity for human review of the decision.

## 9. Children's Privacy

Our services are not directed to individuals under 13 years of age. We do not knowingly collect personal information from children under these ages. If we discover we have collected such information, we will promptly delete it. Parents or guardians who believe we have collected information from their child should contact us immediately.

[www.stannp.com](http://www.stannp.com)



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## 10. Links to Third Party Websites

Stannp is not responsible for privacy policies of other sites accessed via our Website or Platform. We do not control these third parties and are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party websites you visit.

## 11. Questions and Complaints

If you have questions or concerns about our privacy practices:

### Step 1: Contact Our Privacy Officer:

Name: Laura Manning

Email: [privacy@stannp.com](mailto:privacy@stannp.com)

Phone: 647-475-2099

Mail: Stannp Direct Mail SaaS Incorporated, 2727 Steeles Avenue West, Suite 1032, North York, Ontario, M3J3G9

### Step 2: File a Complaint with Privacy Authorities

If you're not satisfied with our response, you may contact:

#### Office of the Privacy Commissioner of Canada

- Website: [priv.gc.ca](http://priv.gc.ca)
- Phone: 1-800-282-1376
- Email: [info@priv.gc.ca](mailto:info@priv.gc.ca)

#### Provincial Privacy Commissioners:

- **Alberta:** [oipc.ab.ca](http://oipc.ab.ca) | 1-888-878-4044
- **British Columbia:** [oipc.bc.ca](http://oipc.bc.ca) | 1-250-387-5629

We have established internal procedures to receive, investigate, and respond to complaints or inquiries regarding our handling of personal information and our compliance with applicable privacy laws.

## 12. Changes to This Policy

This Policy may change from time to time. Modifications to this Policy will be made available through the Website with the date of the latest version and will comply with applicable laws. Where a change is material, we will notify you by email at least 30 days before it takes effect and, where required by applicable law, obtain your consent. Your continued use of the Website after we make non-material changes indicates that you accept and consent to those changes, so please check periodically for updates. We may also communicate changes through the Website or by other means.

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## 13. Contact Information

For all privacy-related matters, please contact:

### Privacy Officer

Laura Manning  
Stannp Direct Mail SaaS Incorporated,  
2727 Steeles Avenue West, Suite 1032  
North York, Ontario  
Canada M3J3G9

Phone: 647-475-2099

Email: [privacy@stannp.com](mailto:privacy@stannp.com)

We respond to privacy inquiries promptly and resolve requests within 30 days as required by Canadian law. If you are not satisfied with our response to a privacy inquiry or complaint, you may contact the Office of the Privacy Commissioner of Canada ([www.priv.gc.ca](http://www.priv.gc.ca)) or, where applicable, your provincial privacy regulator.

[www.stannp.com](http://www.stannp.com)



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