

Kwistech Privacy Policy

Version 2.0 | Effective August 8, 2026 | Approved by John Kwisses, Owner | Supersedes the Kwistech Privacy Policy dated 27 February 2024

1. About this policy

Kwistech ("Kwistech", "we", "us", "our") is a sole proprietorship owned and operated by John Kwisses, based in Alberta, Canada. We provide web development, application development, custom solution development, and technology advisory services.

This policy explains what personal information we collect, why we collect it, how we use and protect it, and the rights you have over it. It applies to personal information we handle in the course of our commercial activities, including through our website at kwistech.ca, through our services, and through direct correspondence.

Which privacy laws apply to us

Because we are established in Alberta, our handling of personal information within Alberta is governed by Alberta's Personal Information Protection Act (PIPA), which has been declared substantially similar to Canada's federal legislation.

Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) applies to personal information we collect, use or disclose in the course of commercial activity that crosses provincial or national borders — which includes work we do for clients outside Alberta.

Where more than one law applies to a given interaction, we apply the standard most protective of the individual. This policy is organised around the fair information principles common to both statutes.

2. Accountability

John Kwisses is accountable for Kwistech's compliance with this policy and acts as our Privacy Officer. Kwistech is a single-operator business, so all handling of personal information is performed by, or under the direct control of, the Privacy Officer.

Privacy Officer: John Kwisses, Owner, Kwistech

Contact: privacy@kwistech.ca

This is also the person you may contact with any question about our use of service providers outside Canada, as described in section 6.

We maintain an internal privacy policy, a documented privacy control framework, and written procedures for responding to privacy requests, complaints and consent withdrawals. Where we engage third-party service providers that handle personal information on our behalf, we remain accountable for that information and use contractual and technical means to require comparable protection.

3. Why we collect personal information

We collect personal information only for purposes a reasonable person would consider appropriate in the circumstances. Those purposes are:

- **To provide our services** — to deliver the work you have engaged us for and to communicate with you about it
- **To manage the client relationship** — quoting, contracting, scheduling, invoicing and support
- **To respond to enquiries** — when you email us or otherwise get in touch
- **To meet legal obligations** — including tax, accounting and records-retention requirements
- **To protect our systems and information** — security monitoring, fraud prevention and incident investigation

We do not sell personal information. We do not trade, rent, or otherwise make personal information available to third parties for their own marketing purposes. We do not use personal information for automated decision-making that produces legal or similarly significant effects.

If we ever need to use personal information for a purpose not identified above, we will identify that purpose and obtain your consent before doing so, unless the law permits or requires otherwise.

4. Consent

We obtain consent before collecting, using or disclosing personal information, except where the law permits otherwise.

- **Express consent** is obtained for sensitive information and for uses beyond those you would reasonably expect.
- **Implied consent** applies where the purpose is obvious and you voluntarily provide the information — for example, emailing us your contact details to request a quote.

We do not require you to consent to collection, use or disclosure beyond what is necessary to provide a service as a condition of supplying that service.

Withdrawing consent

You may withdraw consent at any time, subject to legal or contractual restrictions and on reasonable notice. Email privacy@kwistech.ca. We will explain the consequences before acting — withdrawing consent may mean we can no longer provide some or all of our services. Withdrawals are recorded in our privacy withdrawal register.

5. What we collect

We limit collection to what is necessary for the purposes above, and we collect by fair and lawful means.

Information you give us directly

- **Identity and contact details** — name, business name, email address, telephone number
- **Business relationship information** — correspondence, service requirements and project details
- **Billing information** — billing details and payment records

Our website does not collect personal information

Our website at kwistech.ca is an informational site. It does not use cookies, it does not run analytics or tracking technologies, and it contains no forms. We do not collect IP addresses, browsing behaviour, device information, or any other personal information through the website.

If you wish to contact us, the website directs you to email info@kwistech.ca. At that point we receive only the information you choose to put in your email.

Payments

Card payments are processed by Stripe, Inc. We do not collect or store full payment card numbers. Stripe processes card details directly and provides us only with transaction confirmation information such as the amount, date, and the last digits of the card. Stripe handles that information as an independent controller under its own privacy policy.

Information we do not collect

- We do not knowingly collect personal information from children. Our services are directed at businesses and are not intended for individuals under the age of majority in their province of residence.
- We do not collect health information or biometric information.
- We do not collect government identification numbers, except that you may choose to supply government photo identification solely to verify your identity in connection with a privacy request (see section 10). It is used only to confirm identity and is destroyed once verification is complete.
- We do not conduct video or audio surveillance.

6. Use, disclosure and retention

Use

We use personal information only for the purposes identified in section 3, for a purpose you later consent to, or as required by law.

Disclosure

We disclose personal information only in these circumstances:

- **Service providers** — providers that operate our business, including cloud productivity and storage, email delivery and security, payment processing, and accounting. They may access personal information only to perform services for us and are required to protect it and not use it for their own purposes.
- **Professional advisors** — lawyers, accountants and insurers, where necessary and bound by confidentiality.
- **Legal requirements** — where required by law, subpoena, court order or lawful government request, or to establish or defend a legal claim.
- **Business transfer** — in connection with a sale or reorganisation of the business, subject to the acquirer being bound to use the information consistently with this policy.
- **With your consent** — in any other case.

We do not disclose personal information to other users of our services, to business partners for their own purposes, or to advertisers.

Storage and service providers outside Canada

Alberta's Personal Information Protection Act requires us to tell you when we use service providers outside Canada, what they do, and who you can ask about it. We do use such providers.

Kwistech uses Microsoft 365 as its primary business platform for email, file storage and collaboration. Personal information we hold on that platform is stored in Microsoft datacentres located in the United

States. Payment processing is performed by Stripe, Inc., also in the United States. Other providers we use may store or process information outside Canada.

These providers are used for the ordinary operation of our business — hosting our email and files, securing our systems, and processing payments — and only for the purposes described in section 3.

While personal information is outside Canada it is subject to the laws of that country, and courts, law enforcement and national security authorities there may be able to obtain access to it under those laws. We use contractual and technical safeguards to require comparable protection, but we cannot exclude the operation of foreign law.

You may direct any question about our use of service providers outside Canada to John Kwisses, Owner and Privacy Officer, at privacy@kwistech.ca.

Use of artificial intelligence tools

We use third-party artificial intelligence tools to support our work. Our internal artificial intelligence policy governs their use and requires:

- Approval of each AI tool before use, assessed for security, functionality and cost
- Tracking of every approved AI tool, and the classes of data used with it, in our asset register
- Explicit approval by the Privacy Officer before any confidential information is entered into an AI tool
- Operation of AI tools under access controls including multi-factor authentication

We do not enter client personal information into AI tools except where necessary to perform the services you have engaged us for and where our internal approval requirements have been met. Our approach to artificial intelligence follows the NIST AI Risk Management Framework.

Retention

We keep personal information only as long as necessary to fulfil the purposes it was collected for, or as required by law. Our standard retention period for business records is seven (7) years, after which information is securely deleted. Some information may be kept longer where a tax, legal or contractual obligation requires it. Information no longer needed is destroyed, erased or made anonymous.

7. Accuracy

We take reasonable steps to keep personal information accurate, complete and up to date to the extent necessary for the purposes it is used for. We do not routinely update information unless necessary to fulfil those purposes. If your information changes, or you believe it is inaccurate, email privacy@kwistech.ca and we will correct it.

8. How we protect personal information

We protect personal information with safeguards appropriate to its sensitivity. Our security program is aligned to the NIST Cybersecurity Framework and is documented in our Cyber Security Policy and supporting standards. Our safeguards include:

- **Encryption** of information in transit and at rest
- **Information classification and labelling**, with encryption and access restrictions applied to information classified as confidential or higher

- **Data loss prevention** controls that detect and act on sensitive information — including personal, financial, health and government-issued identifiers — across email, file storage and collaboration tools
- **Access control** on the principle of least privilege, with multi-factor authentication required
- **Endpoint protection** including managed device configuration, disk encryption, antivirus, attack surface reduction and endpoint detection and response
- **Email authentication** using SPF, DKIM and DMARC to protect against spoofing of our domain
- **Security monitoring** of accounts, systems and networks for unauthorised or malicious activity
- **A documented incident response plan** with defined severity levels and response procedures
- **Secure disposal** of information and media at end of life

No safeguard is perfect, and we do not represent that our systems are immune from compromise.

If a breach occurs

Where a breach involving personal information under our control creates a real risk of significant harm to an individual, we will report the breach to the Information and Privacy Commissioner of Alberta without unreasonable delay, as required by Alberta's Personal Information Protection Act, and notify affected individuals where the Commissioner requires it or where we determine notification is appropriate.

Where the federal Personal Information Protection and Electronic Documents Act applies to the affected information, we will report the breach to the Office of the Privacy Commissioner of Canada, notify affected individuals as soon as feasible, notify any organisation that may be able to reduce the risk of harm, and maintain a record of the breach as required by law.

In either case, a notification will describe what happened, what information was involved, what we are doing about it, and what you can do.

9. Openness

This policy is published at kwistech.ca/privacy-policy.pdf. We will provide further information about our privacy practices on request, including the means of accessing your personal information, a description of the types of personal information we hold and how it is used, and the contact details of our Privacy Officer.

10. Your rights and how to exercise them

You have the right to:

- **Access** the personal information we hold about you, and be told how it has been used and to whom it has been disclosed
- **Correct** information that is inaccurate or incomplete
- **Withdraw consent**, subject to legal and contractual restrictions
- **Request deletion** of your personal information, subject to our legal retention obligations
- **Complain** about our handling of your personal information (see section 11)

How to make a request

Email privacy@kwistech.ca. We will provide the appropriate request form.

Identity verification. To protect your information we verify identity before acting on a request. We will ask for government-issued photo identification such as a driver's licence, passport or national identification card. It is used only to verify identity and is destroyed once verification is complete.

Timeline. We respond within 30 days of receiving a complete request. If we need more time we will tell you before the 30 days expire, explain why, and give you a new date. There is no charge for a routine request; if a request would involve unusual cost we will tell you the estimated cost and obtain your agreement before proceeding.

Secure delivery. Where a request results in us providing information to you, we deliver it through a secure channel rather than ordinary email. Access is removed and the channel archived once the request is closed.

If we refuse. We will explain why in writing, cite the provision we rely on, and tell you how to challenge the decision. We may refuse where the law requires or permits — for example where disclosure would reveal another individual's personal information, is subject to solicitor-client privilege, or relates to an ongoing investigation.

11. Complaints

If you have a concern about how we handle personal information, email privacy@kwistech.ca. We will acknowledge your complaint, investigate it, and respond in writing. All complaints are recorded in our privacy complaints register and investigated by the Privacy Officer. Where a complaint is justified we take corrective action, including amending our policies and practices.

If you are not satisfied with our response, you may contact the applicable regulator:

Office of the Information and Privacy Commissioner of Alberta

410, 9925 – 109 Street NW, Edmonton, Alberta T5K 2J8

Telephone 780-422-6860 | Toll free 1-888-878-4044 | oipc.ab.ca

Office of the Privacy Commissioner of Canada

30 Victoria Street, Gatineau, Quebec K1A 1H3

Toll free 1-800-282-1376 | priv.gc.ca

12. Changes to this policy

We review this policy at least annually and update it when our practices change. The version number and effective date appear at the top of this document, and the current version is always published at kwistech.ca/privacy-policy.pdf.

We do not individually notify visitors of changes. By visiting our website or continuing to use our services after a revised policy is published, you accept the revised policy. We encourage you to review it periodically.

13. Contact us

Privacy matters: privacy@kwistech.ca

Kwistech is a sole proprietorship operating in Alberta, Canada. We do not publish a mailing address; please contact us by email and we will provide correspondence details where required.