

SABA SOFTWARE (CANADA) INC. PRIVACY STATEMENT

Saba Software (Canada) Inc. (“Saba”), is committed to the protection of the personal information that it hosts as part of its Halogen TalentSpace cloud-based talent management services offerings (“Halogen TalentSpace”). As part of this commitment, we have set out this Privacy Statement to describe the manner in which we treat our customers’ employee (and prospective employee) personal information when hosted on Halogen TalentSpace. As used in this Privacy Statement, “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.

Collection and Use of Information

Halogen TalentSpace allows our customers to upload information about their organization’s employees and prospective employees (collectively, “Employees”), including names, addresses, resumes, performance reviews and competencies, and compensation information. Our customers choose the types of Employee information they upload into Halogen TalentSpace. We do not collect or use the Employee information of our customers for any purpose other than as described in this Privacy Statement, to provide the talent management services our customers request or as otherwise described in the agreement between us and our customer.

Consent

Implied consent is obtained through your use of Halogen TalentSpace or other Saba services. We will indicate when your consent is a condition of obtaining a service.

Transfers and Disclosures of Personal Information

As a matter of practice, Saba does not disclose, trade, rent, sell or otherwise transfer personal information provided to us, except in accordance with our agreement between Saba and our customer, or as set out in this Privacy Statement, as follows:

- **Service Providers:** We may disclose or transfer personal information to our partners, consultants and suppliers who provide services on our behalf (collectively, our “service providers”). Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own purposes.
- **Sale of Business:** Saba may disclose or transfer personal information to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of Saba or its divisions, or of any of the business or assets or shares of Saba.
- **Legal obligations:** We and our service providers may provide personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspect loss or harm to persons, data or property.

Safeguarding

We understand that data security is an important issue and we are committed to safeguarding the personal information provided to us through Halogen TalentSpace. In addition, with respect to the personal information provided to us by way of Halogen TalentSpace, Saba has implemented information security program that includes written policies and procedures, and security controls, as further described at <https://files.saba.com/saas/halogen-saas-security-services.pdf>.

Retention

Saba retains such information for such periods as it believes is useful, or as may be required by contract, law or regulation.

Storage

Personal information provided to Saba by way of Halogen TalentSpace is stored in Canada. However, in the course of providing services, it may be transferred to and processed by staff or service providers operating outside of Canada. Such staff may be engaged in, among other things, order fulfillment, payment processing and the provision of professional and support services.

Accuracy and Access

Saba's Customers, not Saba, control what personal information is contained in Halogen TalentSpace. Accordingly, if we receive a request from an individual to access or update personal information we maintain on behalf of a particular customer as part of our cloud-based talent management services offerings, we will direct that individual to the relevant Saba customer for assistance.

Changes to this Privacy Statement

This Privacy Statement may be updated periodically to reflect changes to our personal information practices. We encourage you to periodically check this Privacy Statement to ensure that you are aware of the most recent version.

Contact Us

Please contact us at legal@saba.com with any questions or concerns that you may have about this Privacy Statement or our personal information practices.

This Privacy Statement was last updated on March 6, 2018.