

## PRIVACY NOTICE

Last update May 14, 2021

Thank you for choosing to be part of our community at IOT Pay Technologies Inc. (the “**Company**”, “**we**” and “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [info@iotpay.ca](mailto:info@iotpay.ca).

When you apply for our product, visit our website, use our mobile application (the “**App**”) or any of our services (collectively the “**Services**”), we appreciate that you are trusting us with your personal information. We take privacy of your personal data very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through this important notice carefully as it helps you understand what we do with the information collected from you or elsewhere. If you do not agree any of the terms contained herein, you may discontinue use of our Services in accordance with the relevant terms and conditions.

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1. What information do we collect?

### **Personal information you disclose to us**

We collect personal information that you voluntarily provide to us when you apply for or otherwise use the Services, express an interest in obtaining information about us or our Services, when you participate in activities on the Services or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the feature of the Services you use.

We collect names, phone numbers, identity document type and number, gender, date of birth, ownership of certain company, email addresses, residential addresses, job titles, passwords, contact preferences, contact or authentication data, billing addresses, debit/credit card numbers and other similar information.

All personal information that you provide to us must be true, complete and accurate. You must also notify us of any changes to such personal information as soon as practicable.

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## 2. How do we use your information?

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you with your consent and/or for compliance with our legal and regulatory obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:-

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and login process for the performance of the contract. See the section below headed “How do we handle your social logins?” for further information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Services.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user’s consent.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions and policies.

- **To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **Fulfill and manage your orders.** We may use your information to fulfill and manage your orders, payments, returns and exchanges made through the Services.
- **Administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Services, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the “What are your privacy rights?” below).
- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not

associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

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### 3. Will your information be shared with anyone?

We may process or share your data that we hold based on the following legal basis:-

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected, fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically we may need to process your data or share your personal information in the following situations:-

- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis,

email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with our Services. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit or use the Services. These companies may use information about your visits to our website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

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#### 4. Who will your information be shared with?

We only share and disclose your information with the following categories of third parties. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled “How can you contact us about this notice?”.

- Website Hosting Service Providers
- User Account Registration & Authentication Services
- Testing Tools
- Social Networks
- Sales & Marketing Tools
- Retargeting Platforms
- Product Engineering & Design Tools
- Performance Monitoring Tools
- Payment Processors
- Order Fulfillment Service Providers

- Data Storage Service Providers
- Data Analytics Services
- Communication & Collaboration Tools
- Cloud Computing Services
- Affiliate Marketing Programs
- Ad Networks

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5. Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies like web beacons, pixels, tags, scripts and HTML5 as well as log files to access or store information. We or our service providers may combine this information with other information such as your personal information we collect about you to record your preferences, analyse the use of our Services, personalize content and ads and track information about the performance of our advertisement. Please refer to our Cookie Policy for detail.

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6. How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by laws (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than seventy-two (72) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information or, if this is not possible (for example, because your personal information has been stored in backup archives), securely store your personal information and isolate it from any further processing until deletion is possible.

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7. How do we keep your information safe?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information

storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

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## 8. Do we collect information from minors?

We do not knowingly solicit data from or market to children under 19 years of age. By using the Services, you represent that you are at least 19 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 19 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 19, please contact us at [info@iotpay.ca](mailto:info@iotpay.ca).

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## 9. What are your privacy rights?

You may review, change or terminate your account at any time.

### **Account Information**

If you would at anytime time like to review or change the information in your account or terminate your account, you can:-

- log in to your account settings and update your user account; and
- contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our rights against you and/or comply with applicable legal requirements.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your

account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- access your account settings and update your preferences; or
- contact us using the contact information provided.

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## 10. Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“**DNT**”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

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## 11. Do we make updates to this notice?

We may update this privacy notice from time to time. The updated version will be indicated by an updated date and will become effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

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## 12. How can you contact us about this notice?

If you have any questions or comments about this notice, you may contact our Data Protection Officer by email at [info@iotpay.ca](mailto:info@iotpay.ca), by phone at +1(604)283-3268, or by post to:-

IOT Pay Technologies Inc.  
Data Protection Officer  
205-7440 Fraser Park Drive  
Burnaby BC  
V5J 5B9  
Canada

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### 13. How can you review, update or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information or delete it in some circumstances. To request to review, update or delete your personal information, please contact us through the channels mentioned in this notice.

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