

## Privacy Policy

Diskloz Technologies Corp.

Updated: May 1, 2024

This policy is instituted by Diskloz Technologies Corp., a company registered at #304, 12408 108 Ave NW, Edmonton, AB Canada (“we”, “us”, “our”). The policy outlines our commitment to safeguarding the privacy of our service users by detailing our role as the data controller for the personal data of such service users. As a data controller, we dictate the aims and methods of processing personal data.

The term “Personal Data” as used in this policy refers to any information that is directly connected to a living individual who is identified or identifiable. In essence, it includes various pieces of information that, when amalgamated, could result in the identification of a particular individual. Our website employs cookies. However, we will only use cookies that are not strictly required for the operation of our website and services upon obtaining your explicit consent during your initial visit to our website.

It is important to note that despite the fact that all personal data we collect is stored on our secure servers, the transmission of data across the internet is never entirely secure. Therefore, while we will deploy commercially reasonable measures to safeguard your personal data, we cannot ensure total security of your data during transmission to our website. Consequently, any data transmission is done at your own risk. Upon receipt of your information, we will implement stringent procedures and security features to counter unauthorised access.

### ***How We Will Process and Collect Your Data***

#### **Account Data**

We may process your account data (**“Account Data”**). The account data may include your name, phone number, and email address. The source of the account data is you, your employer, or alternate data service. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent **OR** our legitimate interests, namely the proper administration of our website and business **OR** the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract **OR** refine our Service through automated data processing.

#### **Profile Data**

We may process your information included in your personal or corporate profile on our website (**“Profile Data”**). The profile data may include your company name, name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, confidential business information, marketing targets, educational details and employment details. We process this data to enable and monitor your use of our website and services. The legal basis for this processing is consent **OR** our legitimate interests, namely the proper administration of

our website and business **OR** the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

### **Service Data**

We may process your personal data that are provided in the course of the use of our services (“**Service Data**”) The service data may include business information, both confidential and non-confidential, and confidential Customer Relationship Manager (“**CRM**”) information. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, service accuracy, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent **OR** our legitimate interests, namely the proper administration and utilisation of our website and business **OR** the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

### **Inquiry Data**

We may process Information contained in any inquiry you submit to us regarding services (“**Inquiry Data**”). The Inquiry Data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent. We may process information relating to our client relationships, including client contact information (“**Client Relationship Data**”). The Client Relationship Data may include your name, your employer or company name, your job title or role, industry, location, marketing targets, your contact details, and information contained in communications between us and you or your employer. The source of the client relationship data is you or your employer. The Client Relationship Data may be processed for the purposes of managing our relationships with clients, communicating with clients, keeping records of those communications and our services to clients.

The legal basis for this processing is consent **OR** our legitimate interests, namely the proper management of our client relationships.

### **Correspondence Data**

We may process information contained in or relating to any communication that you send to us and any information contained in any linked e-mail accounts (“**Correspondence Data**”). The Correspondence Data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms and any other automated means. The Correspondence Data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with clients **OR** improving our services.

### **Process of Data**

We may process any of your personal data identified in this policy if necessary for legal claims. This processing is based on our legitimate interests, which includes protecting and asserting our legal

rights, your legal rights, and the legal rights of others. This could include court proceedings, administrative procedures, or out-of-court methods such as mediation or arbitration.

We may process any of your personal data identified in this policy to obtain or maintain insurance coverage, manage risks, or receive professional advice. This processing is based on our legitimate interests to protect our business from risks. In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal or business data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

**Please do not supply any other person's personal data to us, unless we prompt you to do so within our platform.**

### ***Corporate Users***

The information provided by corporate users ("Corporate Information") in the context of a corporate account shall be governed by the contractual agreements in place between our company and the corporate entity owning such accounts ("Corporate Entity"), as detailed in a separate Master Service Agreement, which will be explicitly agreed upon by both parties.

### **Ownership and Proprietary Rights**

All Corporate Information provided in the context of a corporate account shall be considered the property of the Corporate Entity. Our company does not claim any ownership rights to such information. However, by providing such Corporate Information, the Corporate Entity grants our company a worldwide, non-exclusive, royalty-free license (with the right to sublicense) to use, copy, reproduce, process, adapt, modify, publish, transmit, display, and distribute such Corporate Information in accordance with the terms of this Privacy Policy and the separate Master Service Agreement.

### **Lower Expectation of Privacy**

The Corporate Entity understands and agrees that the Corporate Information provided in the context of a corporate account may have a lower expectation of privacy compared to personal user data. While our company is committed to maintaining the confidentiality, integrity, and security of all Corporate Information received, the Corporate Entity acknowledges that certain data may be accessed or disclosed in order to:

- Comply with applicable law or regulations;
- Comply with legal process or governmental request;
- Enforce this Privacy Policy and the separate Master Service Agreement, including investigation of potential violations thereof;
- Detect, prevent, or otherwise address fraud, security, or technical issues;
- Respond to user support requests; or

- Protect the rights, property, or safety of our company, its users, or the public as required or permitted by law.

Please refer to the separate Master Service Agreement for more detailed provisions regarding the handling of Corporate Information.

### ***Third Party Disclosure***

**Third-Party Disclosure.** Our platform may need to disclose your personal data to third-party sellers registered with us. This is necessary to facilitate the provision of services or goods that you request. Such third-party sellers encompass, but are not limited to, service providers, vendors, contractors, and other entities offering goods or services through our platform. By using our services, you expressly acknowledge and consent to this potential sharing of your personal data with these third-party sellers.

**Scope of Sharing.** The sharing of your personal data with these third-party sellers will be confined to the minimum necessary to enable them to fulfil their contractual obligations to you and provide the requested services or goods. This could include sharing details such as your name, contact details, transaction history, and any other information deemed necessary to facilitate the successful completion of a transaction or service. **Third-Party Privacy Practices.** We make an effort to ensure that these third-party sellers handle your personal data in accordance with applicable privacy laws and regulations. However, we do not exert control over their individual privacy practices. Consequently, we strongly recommend that you familiarise yourself with the privacy policies of these third-party sellers before initiating any transactions or services with them.

**Liability Limitation.** Please note that upon sharing your personal data with a third-party seller, the use, storage, and disclosure of your data will be governed by their respective privacy policies and practices. We cannot be held liable for the actions or omissions of these third-party sellers with respect to your personal data.

**User Discretion.** If you have reservations or concerns about the potential sharing of your personal data with third-party sellers, we advise you to abstain from using our platform to interact with these entities. Your use of our services signifies your acceptance of this Privacy Policy. Please refrain from using our services if you do not agree with any part of this Privacy Policy.

### ***Data Use by Diskloz***

We may use the Personal Information collected by us in the following manner:

- Monitor the use of the Website for technical administration;
- Use cookies to better understand how You interact with the Website, to monitor aggregate usage by the users and web traffic routing on the Website, and to improve the Website and the Website; and
- Use Personal Information, to conduct research and for further development of our services in order to provide You with a better, more intuitive and personalized experience.

## **Location and Jurisdiction of Data Storage**

**Data Storage and Transfer.** Personal data collected by Diskloz Technologies Corp. from our users is predominantly stored and processed within the United States of America. However, certain data may also be stored and processed within Canada. By using our services and submitting your personal information, you consent to such transfer, storage, and processing within the United States and, where applicable, Canada.

**International Transfers.** For users accessing our services outside the United States or Canada, please note that the information you provide may predominantly be transferred to, stored, and processed in the United States where our primary servers and central database are located. However, a portion of this data may also be handled within Canada. Data protection laws in the United States and Canada may not be as comprehensive as those in your country. By using our services, you consent to your information being transferred to our facilities in both the United States and, where applicable, Canada, as described in this Privacy Policy.

## ***Disclosure of Personal Information***

We do not disclose your personal and business data to any third-party other than what is stated in this Section.

● We may disclose your personal, marketing, and business data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

● We may disclose personal, marketing, and business data to our IT suppliers or subcontractors insofar as reasonably necessary for the services provided by Diskloz Technologies Corp., The service providers we use, in addition to their privacy policy is below:

● In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

In case that we will be under a duty to disclose or share Your personal data with or without Your consent, and with or without notice in order to comply with any legal obligation including without limitation a subpoena, court order, or search warrant.

## ***Retention and Use of Personal Data***

This section outlines our data retention policies and procedures. They are designed to ensure we meet our legal obligations to retain and delete personal data.

Personal data that we process may be stored for a period of time after you no longer use our website. The personal data stored for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted.

For further clarity, we may also retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **Amendments to this Policy**

We may update this policy from time to time for any reason by publishing a new version on our website. **Each version will apply to information collected while it was in place.** You should check this page occasionally to ensure you are happy with any changes to this policy.

### ***User Rights***

In this section, we summarise your rights under data protection law. Some of the rights can be complicated, so we haven't included all the details in our summaries. For a full explanation, read the relevant laws and guidance from regulatory authorities.

Your principal rights under data protection law are:

1. the right to access;
2. the right to rectification;
3. the right to erasure;
4. the right to restrict processing;
5. the right to object to processing;
6. the right to data portability;
7. the right to complain to a supervisory authority; and,
8. the right to withdraw consent.

### **Personal Data Request**

You have the right to confirm whether or not we process your personal data, and if so, to access it. This includes information about the purpose of the processing, the categories of data, and who receives it. If it does not affect the rights and freedoms of others, we will provide you with a free copy of your personal data. Additional copies may require a reasonable fee.

### **Personal Data Rectification**

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

## **Personal Data Erasure**

In some circumstances you have the right to the erasure of your personal data without undue delay.

Those circumstances include:

1. The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
2. you withdraw consent to consent-based processing;
3. you object to the processing under certain rules of applicable data protection law;
4. the processing is for direct marketing purposes;
5. and the personal data have been unlawfully processed.

## **Exceptions to Right of Erasure**

However, it's important to note that the right to erasure is not absolute and certain exceptions do apply. These exceptions include circumstances where the processing of data is necessary for exercising the right to freedom of expression and information, complying with a legal obligation, or establishing, exercising or defending legal claims.

## ***Right to Restrict Processing of Personal Data***

**Limitation on Use of Personal Data.** In certain situations, you have the right to limit the use of your personal data. These situations include instances where you dispute the accuracy of the personal data; when the processing is illegal, yet you are against its deletion; when we no longer require the personal data for our processing purposes, but you need it for initiating, asserting, or defending legal claims; and when you have objected to the processing of your data, and verification of this objection is pending.

**Use of Restricted Information.** In cases where we've restricted the use of your personal data, we will continue to store the information. However, any further utilisation of your data will strictly adhere to the following stipulations: firstly, with your explicit consent; secondly, for the initiation, exercise, or protection of legal rights; thirdly, in order to protect the rights of another individual or entity; or finally, when there are important public interest concerns necessitating the use of the data.

**Specific Objections for Use of Personal Information.** You are entitled to object to the processing of your personal data based on your specific circumstances, provided that the legal justification for such processing is either the performance of a task carried out in the public interest or the exercise of official authority vested in us, or the pursuit of legitimate interests by us or a third party. Should you raise such an objection, we will cease processing your personal information unless we can

demonstrate compelling legitimate reasons that supersede your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defence of legal claims.

**Direct Marketing.** You possess the right to object to the processing of your personal data, including profiling for direct marketing purposes targeted at you. In the event that you raise such an objection, we will discontinue the processing of your personal data for this specific purpose. Nonetheless, it is important to acknowledge and consent that if this objection hinders the quality of our services provided to you, it may result in a decrease in the effectiveness of our services and potentially necessitate the discontinuation of your use of our service.

**Scientific Research.** You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### **Legal Basis for Processing of Personal Data**

To the extent that the legal basis for our processing of your personal data is:

1. Consent;
2. or, that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

### **Relevant Regulatory Authority**

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with relevant supervisory authority responsible for data protection. Specifically,

- If you are a resident of Canada, you may file a complaint with the Canadian Office of the Privacy Commissioner or any other relevant Federal or Provincial body;
- If you are a resident of the United States, you may file a complaint with the Federal Trade Commission (FTC) or any other relevant Federal or State body; or,
- If you are a resident of the European Union or European Economic Area, you may do so in the EU/EEA member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by written notice to us.



## **Cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies can be either “persistent” or “session”. A persistent cookie is stored by a web browser and remains valid until its expiry date, unless the user deletes it before then. A session cookie, however, expires when the user session ends and the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **Cookie Types**

We use cookies for the following purposes:

- Authentication - We use cookies to identify you when you visit our website and as you navigate our website;
- Status - We use cookies to help us to determine if you are logged into our website;
- Personalization - We use cookies to store information about your preferences and to personalise our website for you;
- Security - We use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- Analysis - We use cookies to help us to analyse the use and performance of our website and services; and,
- Cookie Consent - We use cookies to store your preferences in relation to the use of cookies more generally.

## **The Cookies Used by our Service Providers**

Our service providers use cookies and those cookies may be stored on your computer when you visit our website. We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy>

Our service also uses trusted service providers **that may use cookies with respect to their services.**

## **Management of Cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Google Chrome);
- <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Mozilla Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://help.gnome.org/users/epiphany/stable/data-cookies.html> (Gnome Web/Epiphany);
- <https://support.apple.com/en-ca/guide/safari/sfri11471/mac> (Apple Safari); and,
- <https://support.microsoft.com/en-gb/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d> (Microsoft Edge)

Blocking all cookies will have a negative impact upon the usability of many websites.

#### Modern Browser Carveout

If you block cookies, you will not be able to use all the features on our website.

#### **Cookie Preferences**

You can manage your preferences relating to the use of cookies on our website by visiting:

INSERT.

#### **Corporate Details**

This website is owned and operated by Diskloz Technologies Corp.

We are a Canadian Federal Corporation with business number 767333263RC0001 with Corporation Number 1288864-5. Our registered address and principal place of business is located at:

Diskloz Technologies Corp.

304 – 12408 108 Ave NW

Edmonton AB T5M0H3

Canada

You can contact us in the following ways:

1. Website contact form. You can fill out our website contact form and submit it to us. We will receive your message and respond to you as soon as possible.
2. Telephone. You can call us at the phone number that is published on our website. We are available to answer your calls during regular business hours.
3. Email. You can send us an email at the email address that is published on our website. We will receive your email and respond to you as soon as possible.

Data Protection Officer

Our data protection officer's contact details are:

Alexander Jonathan Hardy Steffen

Barrister and Solicitor

32 Britain Street, Suite 100

Toronto, ON, M5A 1R6

Canada