

## IntelliCulture's Commitment to You - Privacy Policy

At IntelliCulture Inc. ("IntelliCulture"), your right to privacy is very important to us. During the course of providing you with our products and services, we may become exposed to your personal information. Because we are committed to protecting your privacy rights and the information you provide to us, we have developed this privacy policy. It explains how we will protect your information and describes how we will use and share it.

This policy is concerned with the protection of your personal information only. Personal information includes any data that can be used to identify you as an individual, including your name, income, personal opinion, interests, home contact information, identification numbers, user IDs, passwords, ethnic origin, and age. Under Canadian law, in a business context, personal information does not include the name, job title, business address, or business telephone number of any employee in an organization.

This policy describes the following practices:

- Collecting information
- Sharing your personal information
- Maintaining your personal information

This privacy policy may change from time to time to reflect IntelliCulture's internal needs, customer feedback, or changes in applicable privacy legislation. IntelliCulture will post all such changes on our website, so please visit this page regularly.

NOTE: IntelliCulture products are not intended to be sold to children under the age of 18. We do not knowingly collect or maintain any personal information or non-personally-identifiable information from anyone under the age of 18 nor is any part of our website directed to children under the age of 18. We will not accept product orders from individuals that we know to be children and will remove and/or delete any personal information we believe was submitted by any child under the age of 18.

### Collecting information

In order to order products from IntelliCulture or to obtain services from IntelliCulture relating to such products, you may be required to provide specific information about yourself, such as your name, address, telephone number and e-mail address. We will inform you when we need information that

personally identifies you, and we will keep this information in strict confidence. Additionally, you may, on occasion, voluntarily provide IntelliCulture with information that can be classified as personal information – all such personal information will be stored and maintained in accordance with this privacy policy.

We collect information about you in the following ways:

#### **As part of your purchase of IntelliCulture's products and/or services**

We may require your name, address, telephone number, certain financial account or credit card information, and potentially other information of which we will inform you in advance, for billing, shipping and payment purposes. This information is kept confidential and stored securely by IntelliCulture and/or its payment provider.

#### **Automatically by IntelliCulture's products and services**

IntelliCulture's products and services contain features that automatically collect information from users, such as usage statistics and other tracking information. Although this information will not identify you personally, it nevertheless provides certain information about you, and we therefore treat it as confidential information. Additionally, use of IntelliCulture's website, products and services may result in the collection of technical information such as the GPS location of the products, vehicle statistics and data collected by IntelliCulture's products and services, computer's IP address, operating system, browser name/version, the referring web page, requested page, date/time, and sometimes a "cookie" (which can be disabled using your browser preferences); such information is used to help us understand the overall usage pattern of our website, products and services.

#### **As part of your use of IntelliCulture's website**

You may have the ability to post information on IntelliCulture's website, such as comments and opinions. Please be advised that any personal information that you voluntarily post to any public forum or to any area where third parties may legally access it, will NOT be considered confidential in any way, and IntelliCulture will not have any obligation to protect it in a secured system or obtain your consent to its disclosure, as you will have made the decision to publicly post it. However, at your request, IntelliCulture will be happy to change it, remove it, or restrict access to it (subject to technical feasibility) in order to protect the integrity of the personal information.

#### **You contact IntelliCulture directly**

Customers and business partners often contact us directly. When you contact any IntelliCulture employee by telephone, e-mail, in person, or through our website, you will be asked to provide consent

to the collection of personal information if your personal information will help us deliver the information, products, or services you require.

### **You respond to communications from IntelliCulture**

From time to time, IntelliCulture may invite you to provide us with information for specific purposes. We may ask for this information through feedback features on our website or software; we may send out e-mail inviting feedback or offering products and services; or we may ask you for information concerning support of our products or services. Your response to these communications may require you to submit personal information and opinions.

### **Your information is obtained through a third party**

Occasionally, IntelliCulture will obtain information about you from third parties, such as mailing list providers, third party service providers, ISPs, or third party application or account providers. Third-party providers are responsible for obtaining consent for the release of personal information to us from those individuals identified on mailing lists, surveys, or through other collection methods.

### **Third party collection of your information**

As IntelliCulture's products are intended to be used in conjunction with third party hardware and software, third parties may collect information from you through the use of websites or other methods while you are using IntelliCulture's products. Third party hardware and software products or services accessed by using, or used in conjunction with, IntelliCulture's products are not owned or controlled by IntelliCulture, and are governed by the third party's terms and conditions and/or privacy policy. You are encouraged to read the terms and other policies published by such third parties on their websites or otherwise.

### **Sharing your personal information**

Subject to any exceptions stated above in the collection of information section, should IntelliCulture collect any of your personal information, we will follow these practices regarding the distribution of that information.

### **Your personal information is protected**

IntelliCulture uses reasonable precautions to protect your personal information and store it securely. Access to your personal information is restricted to those persons who need it, and IntelliCulture takes reasonable steps to prevent the unauthorized use or disclosure of your personal information.

IntelliCulture only uses and discloses your personal information if it helps us facilitate your needs, improve our products and services, meet legal and regulatory requirements, or — to the limited extent possible — manage our internal business operations. Additionally, if there are any disclosure or use restrictions in your consent to the collection of your personal information, IntelliCulture will abide by those restrictions (subject to the consent exceptions listed below). For example, your credit card or financial information will only be used to bill you for the products and services that you have ordered and/or authorized, as applicable.

IntelliCulture may combine your information with other information into an aggregate form, so your information no longer personally identifies you. We may then disclose the aggregate information to third parties, so they can obtain an overall picture of IntelliCulture's products, services, customer sectors and/or usage patterns.

### **We only share your information with your consent**

IntelliCulture provides your information to third parties only for purposes to which you have consented, and we require such third parties to keep your information confidential.

In a few situations, IntelliCulture may be required to disclose your information without your prior consent. For example, IntelliCulture may disclose your information if we are required to do so by law, or if we believe in good faith that such disclosure is necessary to:

- comply with law or legal process
- protect and defend our rights and property, or the rights and property of a third party
- protect against misuse or unauthorized use of any of IntelliCulture's products, services, or other proprietary materials
- protect the personal safety of any person
- allow for a change of ownership of IntelliCulture and associated transfer of all personal information to the new owner of IntelliCulture – this does not affect the protection of your information under this Privacy Policy

IntelliCulture will always try to provide you with prior notice of such disclosure; however, such notice may not always be possible or reasonable given the circumstances.

Additionally, the nature of IntelliCulture's products provided may require the use of certain information to aid in interoperability with third party products and services. Your personal information will only be used to the limited extent necessary to facilitate such interoperability, and may include the following uses:

- to allow third party suppliers, vendors, contractors and other parties to provide products and services to us or to you, or to act on our behalf (this may include, without limitation, our authorization of such third parties to email our users regarding updates, surveys and other inquiries regarding their experience with our products); and
- to allow for audits and surveys to, among other things, validate the size and composition of the users of IntelliCulture's products and services, and understand their experience with IntelliCulture's products.

### Maintaining your personal information

IntelliCulture has established the following practices regarding the maintenance of your personal information.

#### **You can request access to your personal information at any time**

If, for any reason, you wish to review your personal information that IntelliCulture has in its possession, you can contact our Privacy Officer, who will be pleased to provide you with all your personal information that IntelliCulture has on file.

#### **You can request changes to your personal information at any time**

Sometimes, it will be necessary for you to update your personal information IntelliCulture has on file; for instance, up-to-date information is required if you wish to continue to obtain notifications of product recalls or warranty changes. If you wish to make any changes or corrections to your personal information that cannot be done yourself through your personal settings, please contact our Privacy Officer who will implement the changes. This will help us ensure our records are always up-to-date.

#### **You can opt out of communications at any time**

Additionally, you always have the choice of whether you wish to receive information – such as e-mail updates – from IntelliCulture. In some cases, you may do so simply by changing the preferences in the software application provided by IntelliCulture as part of its product.

If you do choose to opt out of communications respecting products and services provided by IntelliCulture, you may not obtain all the benefits we could otherwise provide, such as updates or warnings. IntelliCulture will not have any liability to you for your loss of those benefits or any negative effects respecting your use of IntelliCulture's products or services.

### **You can request that your personal information be destroyed at any time**

A situation may arise where you desire to have all of your personal information that is contained in IntelliCulture's records deleted or destroyed. If this is what you wish, please contact our Privacy Officer, who will take care of removing your personal information from all of IntelliCulture's records. However, there may be situations where we are obligated to retain one archival copy of your information to allow us to comply with laws or respond to legal processes. We will inform you of all such situations, and will only use your retained personal information to the limited extent necessary to comply with such laws or respond to legal processes.

### Contacting our Privacy Officer

IntelliCulture welcomes your comments about this privacy policy, and we would be happy to provide any additional information you require. Please contact our Privacy Officer at:

**Cole Powers**

[cpowers@intelliculture.ca](mailto:cpowers@intelliculture.ca)

**289-404-2653**

*This privacy policy supplements any agreements you already have with IntelliCulture Inc., such as the product terms and conditions, website terms and conditions, and any other agreement. Our privacy policy does not replace the terms of those agreements. By agreeing to those terms and using IntelliCulture's website, products, software and services, you are consenting to the collection and use of your personal information by IntelliCulture Inc. in accordance with this privacy policy. This policy was written in accordance with the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA).*