

# Privacy Policy

## 1. About Us

This platform: <https://platform.subtraid.com> (the "Subtraid Platform") is operated by Subtraid Inc. We are located in Toronto, Canada.

We have appointed a Chief Privacy Officer who is accountable for our personal information handling practices. Our Chief Privacy Officer is Daniel Dampf. If you have a question or complaint about our personal information handling practices, please contact us by using the following email: [support@subtraid.com](mailto:support@subtraid.com).

In this Privacy Policy, the terms "we", "our" and "us" mean Subtraid Inc..

## 2. Effective Date and Scope

This Privacy Policy is effective as of May 12th, 2022.

This Privacy Policy governs our practices with respect to personal information we collect through the Subtraid Platform: [Subtraid](#).

## 3. What Personal Information Do We Collect?

Personal information is information that identifies you or could be combined by us or our service providers and affiliates with other information to identify you. This information includes your personal e-mail address, your home address, your home telephone number, your personal cellphone number, your image, and may include your age, your income and other similar information when associated with you. Personal information may also be information containing details as to whether you have opened our promotional e-mails or how you have used the Subtraid Platform, if we can associate that personal information with you. If you are a business customer or prospective business customer, personal information does not include your title, business address and business telephone number when we use that information to contact you in your business capacity.

We collect personal information from you when you create an account, make a purchase, communicate with us using our web forms to make a request or ask a question, submit a product review, take a survey or otherwise submit personal information to us with your communication. We will also ask you for contact information in order to deliver a product or service to you or the recipient that you designate.

We receive personal information about you from other sources. For example, we will receive information from credit card processors regarding whether the credit card details you gave us have been accepted or declined. We may also acquire information about you from other promotional or marketing companies with whom you shared your information and whom you have allowed to provide information to us.

#### **4. How Do We Use Your Personal Information?**

We use your information to provide products and services and to manage our business operations. Some examples include:

- (a) to register your account;
- (b) to authenticate you when you log into your account;
- (c) to fulfill your requests for products and services;
- (d) to communicate with you about your requests;
- (e) to recommend or to offer you other products and services based on your inferred interests;
- (f) to post your product reviews;
- (g) to communicate with you regarding customer service issues and any product recalls or warranty service; and
- (h) to protect the security or integrity of the Subtraid Platform, websites and our business.

We retain your information for as long as necessary to fulfill the purposes for which we collected the information or as required by law. We maintain a records retention and destruction program to destroy information when it is no longer needed or required.

#### **5. Personalized Experience and Web Analytics**

We also automatically collect information when you visit the Subtraid Platform in order to customize your experience. For example, we collect information about what site referred you to the Subtraid Platform, your browser type, operating system type and version, language, and your Internet Protocol ("IP") address. We also collect information about how you browse through the Subtraid Platform, including logging the pages you visit and the amount of time you spend on certain pages. We use this information for a number of technical purposes to ensure that our pages load correctly in your browser, as well as to personalize our offers to you. We also use this information to improve the Subtraid Platform. For example:

- (a) we use IP addresses to correct pages for your geographical location;
- (b) we log the frequency of visits to certain pages on the Subtraid Platform and how visitors navigate through the Subtraid Platform in order to detect problems, improve the Subtraid Platform and learn about what products and services are of interest to our customers;
- (c) we use information about products or services that you have clicked on to make suggestions about other products or services that you might be interested in viewing; and

(d) we track whether certain types of promotional e-mails were opened by you and whether you sought information about a particular product or service in order to make inferences about other products and services you might be interested in.

In addition, if you create an account, we will use your purchase history with us and our affiliates to show you products or services based on your purchasing characteristics. This means that you may not see offers that other visitors to our site will see.

## **6. Regarding Children and Minors**

the Subtraid Platform and the services offered on the Subtraid Platform are not directed to children under the age of 13 years. We will not knowingly collect personal information about a child under the age of 13.

We do not allow minors (persons who are under the age of majority in their place of residence) to create accounts or make purchases.

## **7. Do We Disclose Your Personal Information to Others?**

We may share your personal information with our service providers and our corporate affiliates that help us with our business operations. We share information with service providers or our affiliates who provide us with marketing and promotional services. We require our service providers and our affiliates to keep your personal information secure. In addition, our service providers may not use or disclose personal information for any purpose other than providing the services on our behalf unless we or they have obtained your consent.

For a list of our affiliates and service providers who have access to your personal information, please contact us.

We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of our business or as part of a corporate reorganization or stock sale or other change in corporate control.

We may also disclose your personal information if it is necessary for us to collect a debt from you or where we have reason to believe that it is relevant to the investigation or decision to investigate a breach of the laws of Canada, a province or territory of Canada, or a foreign jurisdiction, and we are legally permitted to do so.

## **8. Law Enforcement Requests**

We will disclose personal information without your knowledge or consent if we receive an order, subpoena, warrant or other legal requirement issued by a court, tribunal, regulator or other person with jurisdiction to compel disclosure of your personal information.

## **9. Storage Outside of Canada**

Your personal information may be used or stored by us or our service providers and our corporate affiliates outside of Canada. We require that our service providers and our corporate affiliates safeguard your personal information. However, if your personal information is used or stored outside of Canada, it will also be subject to the laws of the country in which it is used or stored.

## **10. Preference Centre**

If you register for an account, you will have the option to choose what marketing and promotional e-mails and communications you receive from us.

You can modify your information by logging into your account and making the requested changes. You cannot modify a product review once it has been submitted. However, you can delete your product review.

You may also choose "close my account" and we will remove your account information from active use.

If you do not re-activate your account within 3 months, we will permanently delete your account. You may also contact us to make a deletion request. Please note that we still maintain information that you provided to us for audit purposes or to comply with our legal obligations. We may also de-identify your information in order to continue to use it for research and analytics purposes to understand our business, to make product improvements and to make available to third parties. We prohibit our employees and third parties from attempting to re-identify information that we have de-identified.

## **11. How Do You Access and Modify Your Personal Information or Make a Complaint?**

If you have an account, log in to access and to modify the personal information stored with your account. If you have questions or concerns about other personal information collected by us and would like assistance accessing that information, please contact our Chief Privacy Officer at [support@subtraid.com](mailto:support@subtraid.com).

## **12. How Do We Protect Your Personal Information?**

We take administrative, technical and physical measures to safeguard your personal information against unauthorized access, unauthorized disclosure, theft and misuse. This includes limiting access of employees to, and the use of, your personal information through the use of passwords and graduated levels of clearance. We do not publish all of our security measures online because this may reduce their effectiveness. We take physical precautions to ensure that the computer servers and

third-party cloud providers on which your personal information is stored and archived, are secure and that access is protected. We educate our employees with respect to their obligations to protect your personal information and we require our affiliates and any third-party service providers to take comparable steps to ensure the protection of any of your personal information that is shared with them.

Although we take precautions against possible breaches of our security systems, no company can fully eliminate the risks of unauthorized access to your personal information and no web portal is completely secure. We cannot guarantee that unauthorized access, hacking, data loss or breaches of our security systems will never occur. Accordingly, you should not transmit personal information to us using the Subtraid Platform if you consider that information to be highly sensitive.

### **13. Links to Third-Party Websites**

You may be able to access third-party websites and services through the Subtraid Platform. This access is provided for your convenience. We do not have any control over those third-party websites and services and we do not provide any guarantee that the privacy practices of the hosts of those websites meet our standards. Your use of such third-party websites is at your own risk and will be governed by the privacy policies of those websites and not by this Privacy Policy. Do not transmit personal information using those websites without reading the privacy policies governing those websites.

### **14. Notice to Persons Outside of Canada**

This Privacy Policy is governed by the laws of Canada and applicable provincial laws. By submitting personal information to us, you understand that your personal information will be subject to the laws of Canada and applicable provincial laws.

### **15. Changes to our Privacy Policy**

We may amend this Privacy Policy from time to time. Use of Personal Information we collect is subject to the Privacy Policy in effect at the time such information is collected, used or disclosed. If we make material changes or changes in the way we use Personal Information, we will notify you by posting an announcement on the Subtraid Platform or sending you an email prior to the change becoming effective. You are bound by any changes to the Privacy Policy when you use the Subtraid Platform after such changes have been first posted.

Contact us at Subtraid Inc.

If you have any questions or concerns regarding our collection, use or storage of your personal information, please contact us at [support@subtraid.com](mailto:support@subtraid.com).

Daniel Dampf  
Chief Technology Officer  
Privacy Officer and Compliance Officer

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