

## **PRIVACY POLICY**

At WouldPay (“**WouldPay**” or “**we**”), we recognize the need to protect the privacy of the personal information you provide to us with respect to your access and use of WouldPay’s website (<https://wouldpay.ca>) (the “**Website**”) and applications (the “**Application**”) and our platform for communication and lead generation, WouldPay (the “**Service(s)**”).

Therefore, we have adopted this privacy policy (the “**Privacy Policy**”), which sets forth, among other things, the type of information that will be collected, the purpose and use of the collected information, and your rights with regard to the collected information. By accessing the Website or Application or using the Services, you are consenting to the collection and the use of your information by WouldPay, but only to the extent described herein. Should you wish to revoke your consent, you may do so in accordance with the provisions of Section 5 below.

We may make modifications, deletions and/or additions to this Privacy Policy (“**Changes**”) at any time. Changes will be effective: (i) thirty (30) days after WouldPay provides notice of the Changes, whether such notice is provided through the Website, Application or the Services, is sent to the email address associated with your account (if applicable) or otherwise; or (ii) when you opt-in or otherwise expressly agree to the Changes or a version of this Privacy Policy incorporating the Changes, whichever comes first. If the modified terms are not acceptable, please do not access or use the Website, Application or Services.

1. **Protection of Your Information.** We are accountable for the information in our custody. Therefore, when we collect or use your information, we will utilize commercially reasonable safeguards to ensure its protection. It should be noted that no security procedure is currently 100% effective. Should any breach of your personal information occur, we will inform you as soon as reasonably possible, as required by applicable law.
2. **Type and Purpose of Collection.** We collect information at various points in the Website, Application or provision of the Services to facilitate its use by our customers. Specifically, two types of information are collected:
  - a. *Non-Personal Information:* Upon accessing the Website, Application or Service, certain non-personal information will be automatically collected without your knowledge or consent, such as your IP address and the referring website (“**Non-Personal Information**”). We use Non-Personal Information to examine our traffic and to view how our customers use the Website, Application or Service. This type of information will not allow you to be personally identified. For example, we use “cookies”, which contains only certain statistical information. You can instruct your computer to inform you whenever a cookie is being sent, or you can disallow cookies through your web browser. If you do choose to disallow cookies, your experience on the Website or Application may be diminished, or your ability to choose some of the options on the Website or Application may be limited.

We also automatically collect certain information when you use the Website or Application, such as a device identifier, MAC address, Internet Protocol (IP) address (if using a browser), operating system, the browser type, the address of a referring site and your activity on the Website or Application. This information is not treated as Personal

Information unless we combine it with or link it to any of the personally identifiable information mentioned below.

- b. *Identifying Personal Information:* To utilize some portions of the Website, Application or Service, you must first provide personal information that will allow you to be identified ("**Personal Information**"). This type of information will not be collected without your consent. The purposes of the collection of Personal Information are the following:
- (i) To sign in to the Website, Application or Service;
  - (ii) To contact you;
  - (iii) To administer your account;
  - (iv) To establish a relationship with you;
  - (i) To facilitate your service through our Website;
  - (v) To facilitate your service with our affiliated service providers;
  - (ii) To allow you to post a picture on the Website, and to identify you as having posted a picture on the Website;
  - (vi) For job postings and applications;
  - (vii) To anticipate and resolve problems with your service;
  - (viii) To understand your needs and desires vis-à-vis the Website, Application or Service;
  - (ix) To update you on changes to our services or products, including new promotions.

We expressly acknowledge that we will not use your Personal Information for any other purposes without your consent. Further, we will only collect Personal Information to the extent necessary for the abovementioned purposes.

The Personal Information we collect will vary depending on how you are using the Website, Application or Service, but may include, without limitation: (i) your name, email address and photos; (ii) credit card information and charge history; (iii) unique identifiers such as user name, user ID, account number and password; (iv) preferences information such as product or content interests, communication or marketing preferences; (v) device information and data; (vi) Twitter, Google+ and Facebook identity; and (vii) age and gender.

Additionally, Personal Information may be used and disclosed to the extent WouldPay may deem reasonably necessary to enforce the terms of any agreement between you and WouldPay, or to protect the rights, property or safety of any person or entity.

3. **Third Party Integration**. Our Service allows you to integrate various third-party services ("**Third-Party Services**"). In order to take advantage of this feature, you may need to authenticate, register for or log into Third-Party Services through the Service or on the websites of their respective providers. When you enable linking between or log in to Third-Party Services through the Service, we will collect relevant information necessary to enable the Service to access that Third-Party Service and your data and content contained within that Third-Party Service ("**Login Credentials**"). We store your Login Credentials long enough to enable linking to the Third-Party Service.

When you enable the Service to link content and data between Third-Party Services, the Third-Party Services will provide us with access to certain information that you may have provided to

the Third-Party Services, and we will use, store and disclose such information in accordance with this Privacy Policy and the rules you set to govern the linking.

Your content and data from Third-Party Services is not permanently stored in unencrypted form by us, said content and data may be stored temporarily for troubleshooting purposes (e.g. in temporary logs). Furthermore, please remember that the manner in which Third-Party Services use, store and disclose your information is governed by the policies of such Third-Party Services, and we shall have no liability or responsibility for the privacy practices or other actions of any Third-Party Services that may be enabled within the Service.】

**[NOTE: TO BE CONFIRMED IF THIRD PARTY INTEGRATION]**

4. **Right to Examine Information.** You have the right to examine any of your Personal Information that we collect. Should you wish to examine such information, please send us a written request to: hello@wouldpay.ca. We reserve the right to charge you a reasonable administrative fee to access your information, as permitted by applicable law. In certain cases we may not be able to provide you with access to all of your Personal Information (eg: if the information also pertains to the Personal Information of another user).
5. **Withdrawal of Consent.** You may withdraw your consent to the collection of Personal Information at any time by sending a written request to hello@wouldpay.ca. Upon receiving notice that you have revoked your consent, we will stop using your Personal Information within a reasonable time, which will vary depending on what information we have collected and for what purpose. Please note that we will send you an email confirmation upon receipt of your request. Therefore, if you do not receive a confirmation email, please contact us again with your request. If you do choose to withdraw such consent, your experience on the Website or Application or use of the Service may be diminished, or your ability to choose some of the options on the Website, Application or Service may be limited.
6. **Sharing Information.** We will not sell, rent or disclose to outside parties the information we collect, save and except that we may share the collected information with other parties as follows:
  - a. *Affiliated Service Providers:* We have agreements with various affiliated service providers to facilitate the functioning of the Website, Application and Service, with whom we may share the information we have collected. For example, we may share your credit card information with the credit card service provider to process your purchase. All administrative service providers that we use are required to have the same level of privacy protection as we have, and therefore we expect that your information will be handled with the same level of care that we employ.
  - b. *Other Users:* Where you so select, we will share your information with other users on the Website, Application or Service (eg: if you share content or a community with another user or where information is displayed for other users to see).
  - c. *Social Sites:* With certain social networking services, if you allow such sharing through the Website, Application or Service.

- d. *Where required by law:* We may share the collected information where required by law, specifically in response to a demand from government authorities where such demand meets the legal requirements.
  - e. *Agents, Consultants and Related Third Parties:* WouldPay, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function.
  - f. *Statistical Analysis:* We may share Non-Personal Information and aggregated information with third parties for advertising or marketing purposes. No Personal Information will be shared in this manner.
  - g. *Transactions:* In connection with, or during negotiations of, any merger, sale of WouldPay's assets, financing or acquisition, or in any other situation where personal information may be disclosed or transferred as one of our business assets.
7. **External Links.** The Website and Application contain links and references to other websites. We are not responsible for the collection, use and disclosure of information, or the privacy practices of such websites, and we expressly disclaim any liability relating thereto.
  8. **International Transfer.** Your information may be transferred to and maintained on computers located outside of your jurisdiction, where privacy laws may not be as protective as your jurisdiction. Your consent to this Privacy Policy represents your consent to any such transfer.
  9. **Terms of Use.** This Privacy Policy is incorporated into and forms part of the Terms of Use, which outlines the terms and conditions you agree to when accessing and using the Website, Application and Service, and which can be found here: ●.
  10. **Persons Under 18.** The Website, Application and Service are not marketed toward persons under the age of 18. If WouldPay discovers that it has inadvertently collected Personal Information about individuals under the age 18, it may promptly delete such information.
  11. **Governing Law.** This Privacy Policy and any action related thereto will be governed by the laws of the Province of Quebec without regard to its conflict of laws provisions. Subject to the rest of this Section, the exclusive jurisdiction and venue of any action in relation to this Privacy Policy will be the District of Montreal and you hereby waive any objection to jurisdiction and venue in such courts. However, in the event of the actual or threatened infringement, misappropriation or violation of WouldPay's copyrights, trademarks, trade secrets, patents or other intellectual property rights, WouldPay may, at its discretion, institute legal proceedings in any jurisdiction(s) which is (are) deemed necessary or advisable.
  12. **Language.** You have requested and agreed that this Privacy Policy be drafted in English. Vous avez demandé et accepté que cette convention soit rédigée en anglais.

Should you have any questions or comments concerning this Privacy Policy, please do not hesitate to contact us at [hello@wouldpay.ca](mailto:hello@wouldpay.ca).