

SECURE RETAIL POS DATA PRIVACY POLICY

1. Introduction

This data privacy policy (“**Privacy Policy**”) describes: (i) how and for what purposes **SECURE RETAIL POS INC.** (indistinctively, “**Secure Retail**”, “**we**”, “**us**” or “**our**”) collects, uses, processes, and/or discloses your Personal Information; and (ii) your privacy rights and how you can exercise them with us. It is important that you read this Privacy Policy together with any other notice that we may provide when we are collecting or processing your Personal Information so that you are fully aware of how and why we are using such data.

By visiting our website, using our services, or otherwise indicating that you agree to this Privacy Policy, you agree to, and authorize our use of your Personal Information as described in this Privacy Policy.

From time to time, we may modify this Privacy Policy. The Privacy Policy is effective as of the “last update” which appears at the top of this page. We will treat your Personal Information in a manner consistent with this Privacy Policy, as it may be amended from time to time, unless we have your express and written consent to treat it differently.

This Privacy Policy is designed to comply with the Personal Information Protection and Electronic Documents Act of Canada (“**PIPEDA**”).

2. What does this Privacy Policy cover?

This Privacy Policy applies to all your Personal Information that we collect or receive, from any source. For purposes of this Privacy Policy, “**Personal Information**” means any information that on its own or combined with other pieces of data can identify you as an individual. Personal Information does not include data where your identity cannot be ascertained from it.

Depending on the nature of your interaction with us, the following table summarizes the major categories of Personal Information that we may collect or process. Please note that the table is not intended to be a precise or comprehensive list of every data point we collect or use, but rather a reasonably representation of this information to assist you in understanding our collection and use of Personal Information practices.

Categories of Personal Information	Examples of Personal Information
Identity Data	• Full name • Username or similar identifier • Title • Date of birth • Gender • Biometric information • Photograph • Tax identification number or similar identifier • Passports, driver’s licenses, or other forms of Government-issued identification • Contact data • Occupation
Contact Data	• Billing, delivery, home, and work addresses • Email address • Telephone numbers
Financial Data	• Bank account • Payment card details • Cryptocurrencies
Transaction Data	• Details about payments to and from you

Categories of Personal Information	Examples of Personal Information
Technical Data	• Internet protocol (IP) address • Your login data • Browser type and version • Time zone setting and location data • Browser plugin types and versions • Operating system and platform • Other technology or information stored on the devices you allow us access to when you visit our website
Profile Data	• Your username and password • Your requests for products or services • Your interests, preferences, feedback, and survey responses
Usage Data	• Information about how you use: – Our website – Products and services
Marketing & Communications Data	• Your preferences in receiving marketing from: – Us – Third parties • Your communication preferences

We also collect, use, and share information that has been anonymized or de-identified, including statistical or demographic data, for any purpose (“**Aggregate Consumer Information**”). Aggregate Consumer Information may be derived from your Personal Information but is not treated as Personal Information because it does not reveal your identity in a reasonable manner. Please note that business contact information—including an employee’s name, title, business address, telephone number, facsimile number, or email addresses—which we collect, use, process, or disclose solely for the purpose of communicating with a person in relation to their employment, business, or profession does not qualify as Personal Information under PIPEDA.

3. **Collection of your Personal Information**

We generally do not collect, use, and/or process your Personal Information unless:

- It is provided to us voluntarily by you or by organizations which have engaged us to provide the services to you (each of them, an “**Organization**”) or through a third party who has been duly authorized by you to disclose your Personal Information to us (“**Authorized Representative**”) after you, your Authorized Representative, or an Organization: (i) have/has been notified of the purposes for which the Personal Information is collected or processed; and (ii) have/has provided express or implied consent to the collection, processing, and usage of your Personal Information for those purposes, or
- Collection, processing, and use of Personal Information without consent is permitted or required by PIPEDA, or other applicable privacy legislation and regulations.

We collect or receive information in several different ways—and in many cases you choose what information to provide—:

Directly from you

You may give us your Personal Information by filling in forms, by email, or otherwise. This includes Personal Information you provide when you:

- Request, purchase, and/or use our products and/or services.
- Request us to create an account.

- Fill out and submit a “Contact Us” form.
- Fill out and submit a “Get Support Now” form.
- Book a free demo.
- Give us feedback or communicate with us.

Third-party service providers and partners

We engage third-party service providers and partners to provide us with products, services, and information (“**Partners**”). We may collect, obtain, or supplement your Personal Information from third parties who license it to us or otherwise provide it to us. This may include information provided through telephone, mailings, or events, from customers, vendors, suppliers, third parties, or other commercially available sources —e.g., data brokers, data aggregators, public databases, etc.—, and from Partners running co-branded campaigns or membership initiatives.

Automated technologies

We use cookies, clear GIFs, Web Beacons, Tracking Technologies, or other similar solutions (“**Tracking Technologies**”) to collect or receive certain information when you visit or use our, read an email, or otherwise interact with content from us. These Tracking Technologies may include first party cookies —i.e., those placed by the website being visited— and third-party cookies —i.e., those placed by a website other than the one being visited—, local shared objects —commonly referred to as “Flash Cookies” or “HTML 5 Cookies”— and tracking pixels —including transparent or clear gifs—.

Cookies are small data files which are placed on your computer or mobile device when you visit a website or use an online service. Cookies enable us to identify and authenticate you and remember your preferences so we can enhance your experience on our website. They also help us serve you ads relevant to your professional interests and to provide aggregated auditing, research, and reporting for advertisers, understand and improve our service, and know when content has been shown to you. Because your web browser may request advertisements and beacons directly from third-party ad network servers, these networks can view, edit, or set third-party cookies, just as if you had requested a web page from their site. Links to Partners’ websites served by Secure Retail may also set third-party cookies. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent.

If you leave the cookies activated, you will be able to take advantage of some of Secure Retail’s website features. If you decline or delete the cookies, then parts of our website may not work properly. Even if you decline or delete cookies, you will continue to be served with advertisements; however, they will not be tailored to your preferences, usage patterns or professional interests. Where legally permitted, we will assume that you have agreed to receive all cookies on our website through your continued use; otherwise, your acceptance of such cookies by way of your browser settings or our consent management tool shall be deemed your acceptance of the use of such Tracking Technologies.

Secure Retail and its Partners use several different types of cookies on their websites, including the following:

- Strictly necessary cookies: These cookies facilitate the operation of our website. Without the use of strictly necessary cookies, portions of our website would not function properly.
- Functional cookies: These cookies are used to remember your preferences on our website and to authenticate your identity.
- Performance cookies: These cookies help us monitor the performance of our website and how users interact with them. Performance cookies collect information such as how often users visit our website, what pages they visit when they do so, and what other website they used prior to coming to our website and provide us with information that allows us to improve our website and services.
- Targeting cookies: Secure Retail and its Partners may use targeting or behavioral advertising cookies to provide you with advertising which is tailored to your interests when you visit our and their websites. Targeting cookies analyze information about your interests and your browsing history and provide you with advertisements that match these interests. Behavioral advertising is a type of advertising that is based upon your web browsing activity over a period of time so it is different than advertising you may see when you are looking for something online using a search engine —e.g., Google, Bing, Yahoo— or on a website you may be visiting at a particular time. For example, you may be doing research on products and services related to data center virtualization. If a data center virtualization provider is conducting an advertising campaign on our network, as you browse the relevant portions of our website, then we may serve you with an advertisement of one of their solutions.

- **Flash Cookies:** When you use our website, which employs Macromedia Flash Player, a small Flash Cookie may be used. The purpose of using these cookies is to store your Flash Player preferences and enhance your browsing experience.

In addition to the foregoing, we use Google reCAPTCHA provided by Google Inc. (“reCAPTCHA”) to: (i) protect our registration forms and other website features; and (ii) check whether data is entered into our forms by a person or by an automated program, script, or bot. reCAPTCHA analyzes the behavior of the person entering the data using various features. This analysis starts automatically as soon as the website is accessed. For analysis, reCAPTCHA evaluates various information —e.g., IP address, browser type, settings, plugins, URL of the referring website, time spent on the respective website, mouse movements, and input characteristics of the data entry, including speed, sequence, and selection of inputs, etc.—. The data collected during the analysis is forwarded to a Google Server in the United States of America, where it is stored and evaluated. We carry this processing out based on our legitimate interest in preventing the misuse of our website through automated means.

You can find Google’s current privacy policy at: <https://policies.google.com/privacy>.

Detailed information about Google reCAPTCHA can be found at: <https://www.google.com/recaptcha>.

You can limit tracking through third-party programs and by taking the other steps indicated in this Section. You may opt-out of Secure Retail’s Internet-based advertising by removing cookies or by setting your web browser to refuse cookies and similar Tracking Technologies. Please note that web browsers operate using different identifiers. As such, you must adjust your settings in each web browser and for each computer or device that you would like to opt-out on. Further, if you simply delete your cookies, you will need to remove cookies from your device after every visit to a website.

Please note that the use of online tracking mechanisms by third parties, such as our Partners, is subject to those third parties’ own privacy policies, and not this Privacy Policy.

4. How is your Personal Information used?

We use, aggregate, and retain your Personal Information as needed to provide you with access to content, products, and services catered to your professional interests and for other legitimate business reasons directly related to our products and/or services. At a high level, we use the Personal Information that has been provided by you directly or indirectly:

- To communicate with you.
- To respond to your product or service inquiries or support requests and comments.
- To deliver or display content and other materials that match your professional interests and responsibilities.
- To contact you for direct marketing purposes regarding information about, and invitations for, products, services, and events relevant to your professional interests and responsibilities.
- To operate our website and improve our products and services.
- To understand trends, usage statistics, and purchase-intent data.
- To diagnose and resolve problems, analyze trends, and monitor usage and resource needs.
- For any other purpose that we inform you about when you give us your Personal Information.

By way of example, we analyze information collected from you to: (i) help us recognize your computer as a previous visitor, and save and remember any preferences that you may have while you were visiting our website; (ii) track, accumulate, and report information on our website and content usage to our Partners so that they can measure the effectiveness of advertisements and content viewed on the website; (iii) help us customize the content on our website; (iv) help us improve the quality and presentation of our content and website; (v) personalize your user experience; and (vi) identify market sensitivities and relative market interest in specific product categories.

In addition to providing you with our own content, we offer you the opportunity to access the content and expertise of our Partners. When you choose to take advantage of our Partner’s content or expertise, you choose to have your Personal Information shared with them as well. Secure Retail and its Partners may use information collected from you directly to provide you with access to content related to your interests based on your activity on our website and other information that you have shared with us. Secure Retail and its Partners may, subject to applicable law, also send you emails on topics of interest and direct marketing offers for products and services.

5. Obtaining your consent

Wherever possible, we seek for your consent to collect, process, use, and disclose your Personal Information before we collect your Personal Information. The form of consent may vary depending on the circumstances and the type of information being requested. Consent can be express or implied and can be provided directly by the individual or by an Authorized Representative. Express consent can be given orally, electronically, or in writing. Implied consent may be reasonably inferred from a person's action or inaction. For example, providing a name and address to answer an inquiry to receive a product demonstration or to receive a response to a support request is construed as implied consent to collect, process, use, and disclose Personal Information. When determining the appropriate form of consent, we consider the sensitivity of the Personal Information involved and the reasons we are collecting it. When using Personal Information for a new purpose, we will document that new purpose and ask for consent again.

6. Ensuring your privacy

We constantly observe and comply with this Privacy Policy, our privacy practices, and all applicable laws—including PIPEDA and other applicable provincial privacy legislation and regulations—.

Third-Party Sites: Because some of our services are provided through digital means, our website may from time to time include links to other third-party websites, plugins, and applications ("**Third-Party Sites**"). These links are meant for your convenience only. Links to Third-Party Sites do not constitute sponsorship, endorsement, or approval of such Third-Party Sites. Clicking on those links or enabling those connections may allow third parties to collect or disclose data about you. Please be aware that we do not control these Third-Party Sites and are not responsible for their privacy statements and practices. Any interaction with Third-Party Sites is between you and that Third-Party Site. We encourage you to read and be aware of the privacy policies of each and every Third-Party Site you visit or use.

7. Use, disclosure, and retention of your Personal Information

We will use, disclose, and/or retain your Personal Information as necessary to comply with our legal obligations, resolve disputes, meet regulatory requirements, prevent fraud and/or abuse, and/or enforce our agreements. We will also retain your Personal Information: (i) for so long as your account with us remains in existence; (ii) as needed to provide our services, and/or fulfill the purposes for which that Personal Information was collected; and/or (iii) as otherwise permitted or required by law.

8. How do we safeguard your Personal Information?

Secure Retail takes the security of the Personal Information that it collects very seriously. While no online or electronic system is guaranteed to be secure, we have implemented a myriad of reasonable technical, organizational, and administrative measures which are generally accepted as industry best practices to protect the Personal Information in our possession. These measures include, but are not limited to, the implementation of current security technologies and processes to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and/or destruction. Our security systems include authenticated access to internal databases, regular audits of processes and procedures, and the use of restrictions designed to limit access to Personal Information in our possession to those employees, agents, contractors, and other third parties who have a specific business reason to know such information. Additionally, we use encryption (HTTPS/TLS) to protect data transmitted to and from our website.

9. Disclosures of your Personal Information

We may disclose your Personal Information and other information we collect to our employees, officers, third-party service providers, agents, subcontractors, and Partners (each of them, a "**Receiving Party**") so far as reasonably necessary for the purposes set out herein including to complete tasks, provide the services, and otherwise fulfill our obligations. If we do disclose your Personal Information, we will require the relevant Receiving Party to respect the security and confidentiality of your Personal Information and to treat it in accordance with the applicable law.

Additionally, we may disclose your Personal Information and other data you provide to us to:

- Verify your identity.
- Detect, protect against, and prevent actual or potential fraud, money laundering, terrorist financing, unauthorized transactions, claims, liabilities, and other financial crimes and illicit activities.
- Facilitate the provision of services and relevant business operations.
- Improve our information, technology, and security systems including websites and applications.

- Provide customer service and technical support.
- Transfer our rights and duties under the relevant terms and conditions governing the use of any service, to the extent allowed.
- Comply with a legal request or to protect or enforce our rights, including to comply with an applicable law or regulation, or in response to a request for information if we believe, in our sole discretion, disclosure is in accordance with any applicable law, regulation, or legal process.
- Protect the rights, property, and safety of us and/or others.

We do not rent, sell, or trade your Personal Information. Our use of Personal Information is limited to the purposes described in this Privacy Policy.

10. Requesting information about your Personal Information

If you make a written request to access certain details of your Personal Information that we have collected, used, and/or disclosed, in accordance with PIPEDA and other applicable privacy legislation and regulations, we will make such Personal Information available to you in a form that is generally understandable and will explain any abbreviations or codes. If you would like to make a written request to access your Personal Information, please email us at: privacy@secureretail.ca.

We understand that there are times whereby we may be requested to speed up our response and in the event we receive such request from you, please be informed that we may contact you to find out further details pertaining to your request.

Please note that applicable law may require or permit us to refrain from providing you with Personal Information that we hold about you with or without notice.

11. Accuracy of your Personal Information

It is important that the Personal Information we hold about you is accurate, complete, and up to date as possible. Please keep us informed if your Personal Information changes during your relationship with us. If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact our Compliance Manager.

12. Responding time

We will attempt to respond to each of your written requests not later than 30 (thirty) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. While we strive to respond to written requests within the timeframe permitted, you have the right to make a complaint to the federal Privacy Commissioner under applicable law.

13. No hidden costs for requesting information

We will not charge any costs for you to access to your Personal Information in our records or to access our privacy practices without first providing you with an estimate of the approximate costs, if any.

14. Verifying your request for information

To protect your Personal Information and to prevent any unauthorized disclosure of your Personal Information, we may request that you provide sufficient identification prior to providing the access to your Personal Information. Any such identifying information will be used only for this purpose, unless previously provided for another purpose.

15. Your California Privacy Rights

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information to third parties for their direct marketing purposes. To request a list of the names and addresses of third parties to whom we disclosed such information during the preceding calendar year along with a list of the categories of information disclosed, please send an email to privacy@secureretail.ca or write to us at the address listed in [Section 17](#) below.

16. Children's privacy

Our products, services, events, and offerings are directed to professionals. Our business is not directed at children, and we do not solicit or knowingly collect any Personal Information from children under the age of 18 without verifiable parental consent. If you are not 18 or older, you are not authorized to use our website or services. Parents should be aware that there are parental control tools available online that they can use to prevent children from submitting information online without parental permission or from accessing material that is harmful to minors. If you learn that a child under 18 has provided us with Personal Information without parental consent, please contact our Compliance Manager.

17. How to contact us

If you wish to exercise any rights that you may have in or in relation to your Personal Information, you can contact our Compliance Manager by:

- a. Email at privacy@secureretail.ca
- b. Writing a letter addressed to our corporate office at 1768 St. James Street, Winnipeg, MB, Canada R3H 0L3, Attn. Secure Retail POS Compliance Manager
- c. Phone at 1-888-927-2399 Ext. 227 or 1-204-927-2399 Ext. 227

We take all comments, questions, concerns, and complaints seriously and will respond as soon as reasonably practicable upon receiving the same.