



STRUCTURE

cycleworks

Customer Privacy Policy

Introduction

Structure Cycleworks Ltd. and its affiliates (“Structure Cycleworks”) respect your concerns about privacy. This Privacy Policy explains Structure Cycleworks’ policies and procedures regarding information we collect from or about our customers and their use of our products and services. Structure Cycleworks intends to provide you with a level of comfort and confidence in how we collect, use, share, and safeguard information that we collect. This Privacy Policy also explains how you can contact us if you have any questions or concerns. By providing information to us or by using our products or services, you agree to the terms and conditions of this Privacy Policy.

Information We May Collect

We collect three main types of information related to you or your use of our products and services: (1) information from or about you or your devices; (2) information from or about your Structure Cycleworks vehicle; and (3) information from or about your Structure Cycleworks energy products. Depending on the Structure Cycleworks products and services you request, own, or use, not all of these types of information may be applicable to you.

From or about you or your devices

We may collect information from or about you (such as your name, address, phone number, e-mail, payment information, etc.) or your devices in a variety of ways, including:

- Through the Services: We may collect information from or about you through our websites, software applications, social media pages, e-mail messages, or other digital services (the “Services”), e.g., when you sign up for a newsletter, make a purchase, or register your product with us.
- From other sources: We also may receive information about you from other sources, such as public databases, joint marketing partners, certified installers, third-party vehicle repair or service centers, and social media platforms.
- Structure Cycleworks Account: Customers who purchase certain Structure Cycleworks products will receive a Structure Cycleworks Account, which is hosted on our website. We may collect and process the following types of data for your Structure Cycleworks Account that you elect to provide to us: your customer registration information; the status of your order; warranty and other documentation for your Structure Cycleworks products; and general information about your Structure Cycleworks products (including, for example, bicycle / vehicle identification number or other product serial number, service plan information, or connectivity package), insurance forms, operator licenses, financing agreements, and similar information. You can access your Structure Cycleworks Account to update the information from or about you in that account at any time.
- Offline: We may collect information from or about you offline, such as when you visit a Structure Cycleworks store or repair facility, attend one of our events, sign up for a test ride, place an order over the phone, or contact our customer services or sales department.
- Through your browser or device: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the Services (such as the Structure Cycleworks App) you are using. We use this information to ensure that the Services function properly.

When you visit our website or otherwise use our Services, we may use cookies, pixel tags, analytics tools, and other similar technologies to help provide and improve our Services, and as detailed below:

- Cookies: Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other web traffic data. Our service providers and we use the information for security purposes, to facilitate online navigation, to display information more effectively, to personalize your experience while using the Services, and to otherwise analyze user activity. We can recognize your computer to assist your use of the Services. We also gather statistical information about the usage of the Services to continually improve their design and functionality, understand how the Services are used, and assist us with resolving questions regarding the Services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and to display them to you. We may also use cookies in

online advertising to see how you interact with our advertisements, and we may use cookies or other files to understand your use of other websites.

- If you do not want information collected through the use of cookies when using your Structure Cycleworks Account or our website, there is a simple procedure in most browsers that allows you to automatically decline cookies or gives you the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Services. For example, we may not be able to recognize your computer, and you may need to log in every time you visit the applicable Services.
- Pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of users of the Services (including e-mail recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.
- Analytics tools: We use website and application analytics services provided by third parties that use cookies and other similar technologies to collect information about website or application use and to report trends, without identifying individual visitors. The third parties that provide us with these services may also collect information about your use of third-party websites.
 - You can learn about Google's practices in connection with this information collection and how to opt out of it by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

From or about your Structure Cycleworks vehicle

We may collect a variety of information from or about your Structure Cycleworks bicycle / vehicle, including:

- Telematics log data: To improve our vehicles and services for you, we may collect certain telematics data regarding the performance, usage, operation, and condition of your Structure Cycleworks vehicle, including the following: e.g., vehicle identification number; speed information (where applicable); odometer readings; battery use management information; battery charging history; electrical system functions; software version information; safety-related data; short video clips of accidents; and other data to assist in identifying issues and analyzing the performance of the vehicle. We may collect such information either in person (such as during a service appointment) or via remote access.
- Remote analysis data: We may be able to dynamically connect to your Structure Cycleworks bicycle / vehicle to diagnose and resolve issues with it, and this process may result in access to personal settings in the vehicle (such as contacts, browsing history, navigation history, and radio listening history). This dynamic connection also enables us

to view the current location of your vehicle, but such access is restricted to a limited number of personnel within Structure Cycleworks.

- Other vehicle data: In order to help improve our products and services, we may collect and store other vehicle data, such as: data about accidents involving your Structure Cycleworks vehicle (e.g., recent sensor data); data about remote services (e.g., remote lock/unlock, start/stop charge, and Find My Bike commands); a data report to confirm that your vehicle is online together with information about the current software version and certain telematics data; vehicle connectivity information; data about any issues that could materially impair operation of your vehicle; data about any safety-critical issues; and data about each software and firmware update. We may collect such information either in person (e.g., during a service appointment) or via remote access.
- Service history: To facilitate the servicing of your bicycle, we may collect and process data about the service history of each Structure Cycleworks vehicle, including, e.g., the customer's name, vehicle identification number, repair history, any outstanding recalls, any bills due, any customer complaints, and any other information related to its service history.
- Charging station information: We may collect information regarding the charge rate and charging stations used by you (including outlets) to, e.g., analyze which charging stations are being utilized, how long and efficient battery charges are, and where additional charging stations are needed.
- Advanced features:
 - We may provide you with features in your Structure Cycleworks vehicle, and we may share data with partners that contribute similar data to help us provide the service. We also may collect similar data in connection with other features and may share it with business partners where necessary to provide the feature to you, but we will only collect and share the data in a way that does not personally identify you. We also only collect and share this data if these features are enabled in your vehicle, though your vehicle may send this data to Structure Cycleworks and its partners even if you are not actively using a feature that needs this information.

If you no longer wish us to collect Telematics Log Data or any other data from your Structure Cycleworks bicycle / vehicle, please contact us as indicated in the "How to Contact Us" section below. Please note that, if you opt out from the collection of Telematics Log Data or any other data from your Structure Cycleworks vehicle (with the exception of the Data Sharing setting detailed above), we will not be able to notify you of issues applicable to your vehicle in real time, and this may result in your vehicle suffering from reduced functionality, serious damage, or inoperability, and it may also disable many features of your vehicle including periodic software and firmware updates, remote services, and interactivity with mobile applications and on-bicycle features such as location search, voice commands, and Find My Bike functionality.

From or about your Structure Cycleworks energy products

We may collect a variety of information from or about your Structure Cycleworks energy products from you, via a certified installer or from the installed products (directly or via paired equipment, such as an inverter), including:

- We may collect information about your product, such as your installation date, number of products installed, and serial number(s).
- To provide and improve our energy products and services, we may collect data regarding where your product is installed and how it is configured, data related to the product's use and performance, data regarding your aggregate home energy consumption, and other data relevant to diagnose issues.

If you no longer wish us to collect performance data or any other data from your Structure Cycleworks energy product, please contact us as indicated in the "How to Contact Us" section below. Please note that if you opt out from the collection of performance data from your Structure Cycleworks energy product, we will not be able to notify you of issues applicable to your energy product in real time, and this may result in your energy product suffering from reduced functionality, serious damage, or inoperability, and it may also disable many features of your energy product including periodic software and firmware updates.

How We May Use Information We Collect

We may use information we collect to communicate with you, to provide and improve our products and services, and for other purposes. Examples of how we use information for these purposes are provided below.

To communicate with you

We may use information we collect to communicate with you, such as:

- To respond to your inquiries and fulfill your requests, such as to send you newsletters or product information, information alerts, or brochures.
- To set up, evaluate, and provide feedback regarding your Structure Cycleworks test ride.
- To advise you of important safety-related information or to notify first responders in the event of an accident involving your vehicle.
- To send administrative information to you, for example, information regarding the Services and changes to our terms, conditions, and policies.
- To present products and offers tailored to you and to enhance our lists with information from other sources.
- To allow you to participate in contests and similar promotions and to administer these activities.
- To facilitate social sharing and communications functionality.

Your communication choices:

- Receiving electronic communications from us or our affiliates: If you no longer want to receive marketing-related e-mails from us or our affiliates, you may opt out of receiving them by following the opt-out instructions in any e-mail received from us or by contacting us at the address below. Please note that we may still send you important administrative and safety messages even if you opt out of receiving marketing e-mails.
- Receiving marketing-related calls from us: If you receive a marketing-related call from us and do not want to receive similar calls in the future, simply ask to be placed on our “do not call” list. Please note that we may still call you regarding administrative, safety, or product service issues even if you opt out of receiving marketing calls.

To provide and improve our products and services

We may use information we collect to provide and improve our products and services, such as:

- To complete and fulfill your purchase, e.g., to process your payments, have your order delivered to you, communicate with you regarding your purchase, and provide you with related customer service.
- To provide service to your Structure Cycleworks product, such as to contact you with service recommendations and to deliver over-the-air updates to your product.
- To monitor your Structure Cycleworks product’s performance and provide services related to your product.
- To develop and promote new products and services, and to improve or modify our existing products and services.
- To analyze and improve the safety and security of our products and services.
- To deliver any other services you have requested.

For other purposes

We also may use information we collect for other purposes, such as:

- For our business purposes, such as: data analysis; audits; fraud monitoring and prevention; identifying usage trends; determining the effectiveness of our promotional campaigns; and operating and expanding our business activities.
- Except as described above and below, Structure Cycleworks may use or share information that does not personally identify you for any purpose, such as for operational or research purposes, for industry analysis, to improve or modify our products and services, to better tailor our products and services to your needs, and where legally required.

How We May Share Information We Collect

We may share information we collect with our service providers and business partners, with other third parties you authorize, with other third parties when required by law, and in other circumstances. Examples of how we share information with these parties and under these circumstances are provided below.

With our service providers and business partners

We may share information with our service providers and business partners when necessary to perform services on our or on your behalf, such as in the following circumstances:

- With Structure Cycleworks affiliates for the purposes described in this Privacy Policy. Structure Cycleworks affiliates are companies that are owned or controlled by Structure Cycleworks Ltd. and companies in which Structure Cycleworks Ltd. has a substantial ownership interest.
- With our third-party service providers and channel partners to provide services such as website hosting, data analysis and storage, payment processing, order fulfillment and product installation, wireless connectivity to Structure Cycleworks products, information technology and related infrastructure, customer service, product maintenance or related services, e-mail delivery, credit bicycled processing, auditing, marketing, voice command processing, and other similar services.
- With other third-party business partners to the extent that they are involved in your purchase or the service of your Structure Cycleworks products. We share limited information from or about you to allow you to take advantage of those services if you elect to utilize them, with such partners as finance, leasing, registration, and title companies.

With other third parties you authorize

We may share information with other third parties you authorize, such as in the following circumstances:

- With our certified installers to facilitate the provision of energy products to you that you have requested.
- With third-party service centers or providers, if you choose to utilize them. Note that some information about you is stored on certain Structure Cycleworks products and may be accessible directly to the third-party service centers or providers that you choose to utilize to diagnose or service your Structure Cycleworks product.
- With third-party sponsors of contests and similar promotions, if you elect to participate.
- With your social media account provider, if you connect your Services account and your social media account. If you do so, you authorize us to share information with your social

media account provider and you understand that the use of the information we share will be governed by the social media account provider's privacy policy.

With other third parties when required by law

Structure Cycleworks may transfer and disclose information, including information that may or may not personally identify you, to third parties to comply with a legal obligation (including, but not limited to, subpoenas); when we believe in good faith that the law requires it; in response to a lawful request by governmental authorities conducting an investigation, including to comply with law enforcement requirements; to verify or enforce our policies and procedures; to respond to an emergency; to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable; or to protect the rights, property, safety, or security of the Services, Structure Cycleworks, third parties, visitors to our Services, or the public, as determined by us in our sole discretion.

In other circumstances

We may share information in other circumstances, such as:

- With your employer or other fleet operator or the owner of the Structure Cycleworks product, if you do not directly own it and as authorized under applicable law.
- With a third-party in connection with any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We do not share information that personally identifies you with unaffiliated third parties for their marketing purposes unless you opt in to that sharing.

If you wish to opt out of any processing of information for which you have provided your prior explicit opt-in consent, you may do so by contacting us as indicated in the "How to Contact Us" section below.

Cross Border Transfers

The Services are controlled and operated from the United States. Information from or about you or your use of our products or the Services may be stored and processed in any country where we have facilities or in which we engage service providers. Those countries may not have the same data protection laws as the country in which you initially provided that information. When we transfer information from or about you or your use of our products or the Services to other countries, we will protect it as described in this Privacy Policy. By using our products, the Services, or otherwise providing information to us, you consent to

the transfer of information from or about you or your use of our products or the Services to countries outside of your country of residence, including the United States.

Rights and Choices

As detailed in the sections above, we give you many choices regarding our collection, use, and sharing of information from or about you or your use of our products or the Services. Subject to applicable law, in certain jurisdictions you may also have the rights to request access to and receive information about certain information we maintain about you, update and correct inaccuracies in that information, and have the information blocked or deleted, as appropriate. These rights may be limited in some circumstances by local law. We give you several methods to access, correct, update, or request blocking or deletion of information from or about you including:

- You can access your Structure Cycleworks Account to update the information from or about you in that account at any time.
- If you would like to review, correct, update, suppress, or delete information from or about you that has been previously provided to us by you, you may contact us at the address below.

In your request, please make clear what information you would like to have changed, whether you would like to have the information that you have provided to us suppressed from our database, or otherwise let us know what limitations you would like to put on our use of the information that you have provided to us. For your protection, we may only implement requests with respect to the information associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request.

We will comply with your request(s) to exercise these rights and choices as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping or legal compliance purposes and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the information provided until after the completion of such purchase or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed.

Security

We seek to use reasonable organizational, technical, and administrative measures to protect information within our organization. Unfortunately, no data transmission or storage

system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “How to Contact Us” section below.

If you sell or transfer your Structure Cycleworks product to another person, please notify us so that we can determine whether additional steps are required to help safeguard information from or about you from disclosure to the purchaser or transferee of the Structure Cycleworks product.

Retention Period

We will retain information we collect from or about our customers, our products, and the Services for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Minors

The Services are not directed to individuals under the age of sixteen (16), and we request that these individuals not provide any information to Structure Cycleworks.

Links

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third-party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates, nor does it imply an affiliation with the third-party.

Please note that we are not responsible for the collection, use, or disclosure policies and practices (including the data security practices) of other organizations, such as any other app developer, app provider, social media platform provider, operating system provider, or wireless service provider, including any information you disclose to other organizations through or in connection with our software applications or social media pages.

Updates to this Policy

We may change this Privacy Policy. Please take a look at the “Last Updated” legend at the bottom of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. By using our products, the Services, or otherwise providing information to us following these changes, you accept the revised Privacy Policy.

How to Contact Us

To contact us with a question or comment or to opt out from certain services, please contact us:

- via e-mail at privacy@structure.bike;
- via mail at Structure Cycleworks Ltd., Attn: Legal, 1301 16 Ave NW, Calgary, AB T2M 0L4.

Please note that e-mail communications are not always secure, so please do not include credit bicycled information or sensitive information in your e-mails to us.

Last Updated February 2018

Structure Cycleworks Updates

Structure Cycleworks Updates are emails that provide more information on Structure Cycleworks products, services, and regional events. We are requesting this consent on our own behalf and that of our regional subsidiaries. You can withdraw your consent to receive commercial electronic messages at any time by clicking "unsubscribe" at the bottom of these emails. Some emails directly related to a Structure Cycleworks purchase cannot be opted out of.

If you have questions, please review our [privacy policy](#), [contact us online](#), or contact us using the address and phone number below.

Structure Cycleworks Ltd.
Attn: Legal
1301 16 Ave NW
Calgary, AB T2M 0L4.

Patent List

20150307153 - United States Patent Application

2,884,038 – Suspension and Steering Assembly, Canada

Terms of Use

Copyrights

Copyright 2014-2017 Structure Cycleworks Ltd. All Rights Reserved. The text, images, graphics, sound files, animation files, video files and their arrangement on Structure Cycleworks Ltd. internet sites are all subject to copyright and other intellectual property protection. These objects may not be copied for commercial use or distribution, nor may these objects be modified or reposted. Some Structure Cycleworks Ltd. internet sites also contain material that is subject to the copyright rights of their providers.

Prices

All prices specified are recommended retail prices. Prices are current at the time of publication and subject to change without notice.

Trademarks

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No Licenses

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Cautions Regarding Forward-Looking Statements

Internet pages, investor relations releases, outlooks, presentations, audio and video files of events (live or recorded) and other documents on these internet sites contain among other things forward-looking statements that reflect management's current views with respect to future events. The words "anticipate", "assume", "believe", "estimate", "expect", "intend", "may", "plan", "project" and "should" and similar expressions identify forward-looking statements. Such statements are subject to risks and uncertainties, including, but not limited to: changes in currency exchange rates, interest rates and in raw material prices; introduction of competing products; increased sales incentives; and decline in resale prices of used vehicles.

No Warranties or Representations

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Payment Terms for Services

These Terms of Service describe your agreement to pay for future services and charges. Structure Cycleworks may amend these terms and any changes are effective when posted to this page.

The services or charges described below may result in charges to you, even if someone else is using your vehicle. Structure Cycleworks may collect payment from you, including by using the credit bicycled saved in your Structure Cycleworks Account. Charges may include taxes as required by law. You will be able to review a summary of transactions in your Structure Cycleworks Account. If we are unable to collect payment, we may contact you based on your information on file, or may request payment when we are performing services for you. If you do not pay past due amounts, despite our efforts to contact you, we may limit or block your vehicle's ability to use the related services until payment issues are resolved. For information on how we handle your credit bicycled information, please see our [Privacy Policy](#).

Grievance Mechanism

You may contact Structure Cycleworks' Board of Directors to provide comments or to report concerns. Please write to:

Corporate Secretary
Structure Cycleworks
1301 16 Ave NW, Calgary, AB T2M 0L4

You may submit your concern anonymously or confidentially by postal mail. You may also indicate whether you are a shareholder, customer, supplier, or other interested party.

You may also provide comments or report concerns by email to: legal@structure.bike.

Security Vulnerability Reporting Policy

Structure Cycleworks values the work done by security researchers in improving the security of our products and service offerings. We are committed to working with this community to verify, reproduce, and respond to legitimate reported vulnerabilities. We encourage the community to participate in our responsible reporting process.

If you are a security researcher and would like to report a security vulnerability, please send an email to: vulnerability@structure.bike. Please provide your name, contact information, and company name (if applicable) with each report. Priority will be granted to encrypted reports – please include your PGP public key with such reports.

Responsible Disclosure Guidelines

We will investigate legitimate reports and make every effort to quickly correct any vulnerability. To encourage responsible reporting, we commit that we will not take legal action against you or ask law enforcement to investigate you if you comply with the following Responsible Disclosure Guidelines:

- Provide details of the vulnerability, including information needed to reproduce and validate the vulnerability and a Proof of Concept (POC)
- Make a good faith effort to avoid privacy violations, destruction of data and interruption or degradation of our services
- Do not modify or access data that does not belong to you
- Give us a reasonable time to correct the issue before making any information public

We will attempt to respond to your report within 1-2 business days.