

PIIVA INC. PRIVACY POLICY

Last updated: July 23, 2021

IF YOU OBJECT TO ANYTHING IN THIS PRIVACY POLICY, YOU CANNOT USE THE WEBSITE OR PIIVA MOBILE SERVICE AND YOU SHOULD IMMEDIATELY TERMINATE YOUR USE THEREOF. THIS PRIVACY POLICY MUST BE READ IN CONJUNCTION WITH PIIVA INC.'S TERMS OF SERVICE AGREEMENT

Welcome to Piiva

Please read the following Piiva Privacy Policy (“Privacy Policy”) carefully before using the Services (as defined in the Terms of Service) offered by Piiva Inc. (“Us”, “We”, “Our” or “Piiva”). The purpose of this Privacy Policy is to describe how we collect, use and disclose the personal information you provide us or that we otherwise collect from you when you use the Services and how it can be accessed by you and deleted when necessary. This Privacy Policy also explains what non-personal information we collect from you when you are using the Services. By using the Services, you expressly consent to the information handling practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use ANY Piiva Services.

1. COLLECTION OF PERSONAL INFORMATION

(a) Here is personal information about you that we may collect:

- i. When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages, services or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site (“Device Information”). We collect Device Information using the following technologies:
 - “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more

information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

- “Sessions” is data stored temporarily in computer memory on our servers during your browsing session and often include an anonymous unique identifier.
 - “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
 - “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.
- ii. When you register for Services, we will collect your full name, company (if applicable), email address, phone number, address, referral information, and your interests/goals and we will ask you to choose a password (“Registrant Information”).
- iii. We also collect certain information from you:
- if you express an interest in obtaining additional information about our services, request customer support, use our "Contact Us" or similar features, register to use our websites, sign up for an event or webinar, or download certain content, we generally require you to provide us with your contact information, such as your name, job title, company name (if applicable), address, phone number, email address, or username and password; and
 - if you visit our offices, you may be required to register as a visitor and to provide your name, email address, phone number, company name and time and date of arrival.

For the purposes of this Privacy Policy, Device Information and Registrant Information are referred to as “Personal Information”.

1. USE OF YOUR PERSONAL INFORMATION

- (a) We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).
- (b) We may use the information we collect through our Site for a range of reasons, including:
- To create and manage your account.
 - To provide you access to our Services.
 - To provide, operate, optimize, and maintain our Site.
 - To send you information for marketing purposes, in accordance with your marketing preferences.

- For recruitment purposes if you have applied for a role with Piiva.
- To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
- To manage our Site and system administration and security.
- To improve the navigation and content of our Site.
- To identify any server problems or other IT or network issues.
- To process transactions and to set up online accounts.
- To compile aggregated statistics about site usage and to better understand the preferences of our visitors/users.
- To carry out research and development to improve our products and services.
- To customize content and layout of the Site.
- To manage user registrations.
- To promote security of the Site.
- To identify you at login for security purposes.
- To handle contact and user support requests.
- To manage event registrations and attendance.
- To develop and improve our Site.
- To display personalized advertisements and content.
- To carry out other legitimate business purposes, as well as other lawful purposes.
- To calculate performance when the Biofeedback unit is used.
- To assess your preferences and degree of satisfaction with the Services.
- For any other purpose authorized or required by applicable law.

(c) We may also collect information about you from other sources, including third parties from whom we have purchased personal data, and combine this information with Personal Information provided by you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. In particular, we collect personal data from the following sources:

- Business contact information, including mailing address, job title, email address, phone number, 'intent data' which is web user behaviour data, IP addresses, social handles, LinkedIn URL and custom profiles from third party data providers for the purposes of targeted advertising, delivering relevant email content, event promotion and profiling;

(d) We may combine Personal Information with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy.

2. DISCLOSURE OF YOUR PERSONAL INFORMATION

- (a) We disclose your Personal Information to third parties to help us use your Personal Information, as described above. These include:
- Heroku to host our website - you can read more about how Heroku uses your Personal Information here: <https://www.salesforce.com/company/privacy/>;
 - Google Analytics to help us understand how our customers use the Site - you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>;
 - We may also share your Personal Information with our contracted service providers which provide services such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support and data enrichment.
- (b) We may also disclose your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, court order, search warrant or other lawful request for information we receive, or to otherwise protect our rights.
- (c) We may also disclose your personal information in connection with, or during negotiations of, a prospective or a completed business transaction relating to any reorganization, merger, loan, purchase, sale or other acquisition of all or a portion of our assets or activities by or into another corporation, including in the context of a due diligence or closing process. In all cases where such disclosure is permitted or required by applicable law (for example, a situation that threatens the life, health or safety of an individual, court order, etc.).

3. BEHAVIOURAL ADVERTISING

- (a) As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.
- (b) You can opt out of targeted advertising through the following list:
- Facebook - <https://www.facebook.com/settings/?tab=ads>
 - Google - <https://www.google.com/settings/ads/anonymous>
 - Digital Advertising Alliance's opt-out portal - <http://optout.aboutads.info/>

4. SOCIAL MEDIA SHARING AND THIRD PARTY WEBSITES

- (a) Some features offer you the possibility to share content on social media such as Facebook, Instagram and Twitter. All social media sharing is based on permissions provided by you. By default, the permission setting is off. Please remember that the use these third parties make of your information will be governed by their privacy policies and that anyone can read, collect and use information that you publish in a public forum or on social media.
- (b) Our Site contains links to other websites which are owned and operated by third parties, whether these be partners, suppliers or social media (like Facebook, Twitter, You Tube and Instagram). These links will let you leave the Site. We have no control over the operation of these sites and the use that you make of them, and we are not responsible for any of their procedures and practices. We therefore encourage you to review and understand the privacy policies published on any third-party websites you may access through the Services before using or submitting any information to them. We accept no responsibility or liability in respect of these third-party services.

5. DO NOT TRACK SIGNAL

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

6. YOUR RIGHTS

- (a) If you are a European resident, you have the right to access Personal Information we hold about you and to ask that your Personal Information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.
- (b) Additionally, if you are a European resident we note that we are processing your information in order to pursue our legitimate business interests listed above. You have the right to restrict our processing of your personal information. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.
- (c) Regardless of residency, upon written request and subject to proof of identity, you may access the personal information that we have collected, used or disclosed and request that it be corrected, as authorized or required by applicable law.

7. HOW TO EXERCISE YOUR RIGHTS

- (a) To exercise your rights, please contact us in accordance with the "Contact Us" section below. We try to respond to all legitimate requests within thirty (30) days and will contact you if we need additional information from you in order to honor your request.
- (b) If you have registered for an account with us, you may generally update your user settings, profile, organization's settings or event registration by logging into the applicable website with your username and password and editing your settings or profile.

- (c) To update your billing information, discontinue your account, and/or request return or deletion of your Personal Information and other information associated with your account, please contact us.

8. DATA RETENTION

- (a) We may retain your Personal Information for a period of time consistent with the original purpose of collection (see "Purposes for which we process Personal Information and on what legal basis" section above). We determine the appropriate retention period for Personal Information on the basis of the amount, nature, and sensitivity of your Personal Information, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements (such as applicable statutes of limitation).
- (b) Your personal information is stored on servers hosted in the United States. Your personal information is subject to the laws of the countries in which it is stored and used. The applicable foreign laws and privacy legislation of such country may differ from those applicable in Canada, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies in that foreign jurisdiction, pursuant to applicable laws in that foreign jurisdiction. By providing us with your personal information, you agree to allow it to be transferred to the United States. Your personal information is stored for as long as we need it in order to provide the Service to you.
- (c) After expiry of the retention periods, your Personal Information will be deleted. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of the data.

9. SECURITY

We take precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the Personal Information we process or use. While we follow generally accepted standards to protect Personal Information, no method of storage or transmission is perfectly secure. Our security measures can only minimize the risk of security issues. You are solely responsible for protecting your password, limiting access to your devices, and signing out of websites after your sessions. If you have any questions about the security of our Site, please contact us via the "Contacting Us" section below.

10. MINORS

The Site is not intended for individuals under the age of 18 without the consent of a parent or guardian. If we learn that we have collected personal information on a person under 18 years of age without first having received the authorization of a parent or guardian, we will take the necessary measures to delete that information within a

reasonable timeframe. If you have information regarding a minor using the Site without parental authorization, please contact us via the “Contacting Us” section below so that we may begin our internal investigation.

11. CHANGES

The Privacy Policy may be periodically amended to reflect changes made to our practices or for other operational, legal or regulatory reasons. If we make any such change, we will post a notice to that effect on our Site in order to inform you of the date on which these amendments will come into effect. We therefore invite and encourage you to consult our Site from time to time to stay informed of the latest developments. Your continued use of the Service after the effective date will be construed as an acceptance of these changes on your part. This Privacy Policy was last updated and is effective as of the effective date indicated above.

12. CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at support@piiva.ca with the subject heading “Privacy Policy Inquiry”.