

## Privacy Policy

### Via Informatics, Inc.

Via Informatics, Inc. (the “**Company**”) recognizes the importance of privacy and the sensitivity of Personal Information (as defined herein). This Privacy Policy outlines how we manage your Personal Information and safeguard your privacy.

### Your Privacy Rights

Effective January 1, 2004, organizations engaged in commercial activities must comply with the

*Personal Information Protection and Electronic Documents Act* (the “**Act**”).

The Company is responsible for the Personal Information we collect, use, maintain and disclose. To ensure accountability, we have developed this policy, and trained our staff about our policies and practices.

What is “Personal Information”?

Personal Information is any information that identifies you, or by which your identity could be deduced. It does not include your name, business address, business title, professional designation(s) or business telephone number.

Why do we collect personal information from you?

We collect personal information to understand and analyze your usage trends and preferences and to create new features and functionality that we may share with third parties.

The information we collect may include:

- Contact information, such as your name, email, address, telephone number, and mobile number.
- Identity Information, which we may collect for a variety of purposes,

such as to meet applicable reporting requirements or to verify your identity

- Transactional and performance data regarding the tasks you perform.
- Demographic and relationship information you choose to share, including by connecting to the Site through a social network. This information may be collected either directly or through the Company's third party partners' ("Partner") sites that you use to connect to or access the Internet.

How do we collect your personal information?

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect Personal Information directly from you, but we may also obtain information about you through your use of third party networks and sites, including, but not limited to:

- Cellular networks;
- Sensor and beacon networks;
- Social and online media networks;
- Device OS and mobile application based data;
- Wearable technologies; and
- Point of sale and commerce data;

We may also automatically collect information, such as your Internet Protocol address, your operating system, the browser type, geographical location, the address of a referring web site, and your activities on the Internet. We treat this information as Personal Information if we combine it with or link it to any of the identifying information mentioned above. Otherwise, it is used in an aggregated

format only.

## Consent

In all cases, we shall ask you to provide explicit consent, if we collect, use, or disclose your Personal Information. Normally, we ask for your consent electronically, but in some circumstances, we may accept your verbal consent. We may also ask for your consent through our Partners. In some instances, your consent may be implied through your conduct with us or through our Partners.

## Use of Your Information

As noted above, we collect Personal Information to understand and analyze your usage trends and preferences and to create new features and functionality that we may share with third parties. The Company does not disclose your Personal Information to any third party to enable them to directly market their products and services to you.

## Disclosure of your Personal Information

Where applicable, under certain circumstances, the Company will disclose your personal information:

- when we are required or authorized by law to do so, for example if a court issues a subpoena;
- when you have consented to the disclosure;
- when the services we are providing to you require us to give your information to a third party. Your consent will be implied, unless you tell us otherwise;
- where it is necessary to establish or collect amounts owed to us;
- if we engage a third party to provide administrative services to us (such as computer back- up services or archival file storage)

and the third party is bound by our privacy policy;

- if the information is already publicly known.

### Updating Your Information

Where applicable, if we collect your Personal Information, it is important that the information be accurate and up-to-date.

If any of your information changes, please inform us so that we can make any necessary changes.

### Is My Personal Information Secure?

The Company takes all reasonable precautions to ensure that your Personal Information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- restricted file access to personal information;
- data minimization;
- de-identification of all Personal Identifiable Information
- deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies

### Access to Your Personal Information

You may ask for access to any Personal Information we hold about you. Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

## Correcting Errors

If the Company holds information about you and if you can establish that it is not accurate, complete and up-to-date, the Company will take reasonable steps to correct it.

### Can I be Denied Access to My Personal Information?

Your rights to access your Personal Information are not absolute. We may deny access when:

- denial of access is required or authorized by law;
- when granting you access would have an unreasonable impact on other people's privacy;
- to protect our firm's rights and property;
- where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we shall explain why.

The Company does not use your Social Insurance Number as a way of identifying or organizing the information we hold about you.

### How Long do you Keep my Personal Information?

We keep your Personal Information as long as is reasonably necessary for us to complete our dealings with you, or as may be required by law, whichever is longer.

## Communicating with Us

You should be aware that email is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

## Changes to this Privacy Policy

Since the Company regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

**Request for Access** If you have any questions, or wish to access your personal information, please write to our Privacy Officer at:  
**[privacy@locationgenius.com](mailto:privacy@locationgenius.com)**

On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.