

# **Privacy Policy**

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## **Privacy Policy**

#### Last updated: September 11, 2023

## "PLUS COMPANY" AND "COMPANY" MEAN PLUS COMPANY CANADA INC. AND ITS AFFILIATES AND BUSINESS UNITS IN CANADA.

Plus Company respects the privacy of its customers.

This Policy concerns you. It describes how we collect, use, disclose and protect your personal information, including when you visit our website or any website we own, operate or control (collectively, the "Site"), when you contact us by phone or email or when you communicate with us via social media.

We may update this Policy (see "Changes to the Policy" below).

You should read this entire Policy before submitting information to us or using our Site. If you submit personal information to us, we assume that you authorize us to use and disclose it as described in this Policy.

## What is personal information?

Personal information is information that identifies you directly or indirectly, on its own or with other information, such as your name, contact details or IP address.

We may make full use of all information that is de-identified, aggregated or otherwise not in personally identifiable form.

#### Information collection and use

We collect personal information using three methods:

- > From you
- > Using automated technology when you visit our Site or communicate with us through email
- When third parties, such as service providers, collect such personal information on our behalf

When do we collect your personal information?	What type of personal information do we collect?	Why do we need it?
When you browse our site	Usage information – IP address, information on the device, domain name,	To better understand how you use our Site.
	browser used to visit our site, pages displayed, time spent on a page, link clicks	To modify or improve our Site, services and business activities.
		For marketing, research and legal purposes.
	With your consent,	
	we may have access to your geolocation and site-navigation patterns.	To comply with our policies, procedures and legal obligations, including complying with law enforcement or governmental
When you contact us by phone or email	Information you provide to us, such as personally identifiable information or contact information, as well as your comments or questions	authority requests, investigating fraudulent activity, resolving disputes and enforcing our legal agreements and policies.
When you communicate with us via social media	as your comments or questions	

# With whom do we share this personal information?

As part of our business operations, we may disclose personal information to the following categories of third parties:

- Consultants, service providers and contractors we use to support our business and operations (e.g., hosting or operating our Site and services, data collection, reporting, Site metrics and analytics, data analysis, fraud detection services) who have agreed to keep the information confidential and use it only to provide the applicable services.
- > Government authorities, agencies, if required to do so by law, regulation or court order, or to respond to governmental and/or law enforcement requests.
- An acquirer or successor in interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of Plus Company or its affiliates, including any negotiation thereof.

#### Where is your personal information stored?

We currently retain personal information in North America.

We may disclose personal information in locations other than your country, province or state of residence, where privacy laws may differ.

If your personal information is used outside your country, province or state of residence, it is subject to the laws of the place where it is located and may be disclosed to governments, courts, law enforcement agencies or regulatory bodies of that place, or disclosed in accordance with the laws of that place. However, our practices regarding your personal information will remain governed by this Policy and by applicable privacy laws.

# Retention of personal information

We will retain your personal information (collected through online and offline methods) for as long as it is necessary for the purposes described in this Policy. We will also retain and use your personal information to the extent necessary to comply with our legal obligations, resolve disputes and enforce our legal agreements and policies.

## Intended audience of Site

Our Site, social media accounts and online activities are intended for persons aged 17 and over. Therefore, we do not request personal information from minors aged 16 years or younger, nor do we knowingly collect such information from minors aged 16 or younger. If you are not 17 or older, you should not visit or use our Site.

# How do we protect your personal information?

We take reasonable, appropriate steps to protect personal data from loss, misuse and unauthorized access, disclosure, alteration or destruction, whether in transmission or storage. Remember, however, that no security system is infallible and that transmission over the Internet is not perfectly secure or error-free.

We use a secure server. Only authorized persons have the right to access this information, which they are required to keep strictly confidential.

## Your rights with regard to your personal information

You have several rights with respect to your personal information, including:

Right to access and correct	Right to withdraw your consent
You may request access to and obtain a copy of the personal information we hold about you.	You may request to withdraw your consent to our use or disclosure of your personal information.
If any personal information about you is inaccurate, incomplete or ambiguous, or if the collection, disclosure or retention of such personal information is not permitted by law, you may require that it be rectified.	In most cases, withdrawing your consent means that we will no longer be able to offer you certain services. Otherwise, we will inform you of the consequences of refusal in our request for consent.

You can also ask us for information about the source of your personal information (if it was not obtained from you), as well as the names of persons who have access to your information and details about how long it is kept.

To exercise your rights, please send a request in writing, along with proof of identity, to our Privacy Officer at the contact information provided under How to contact us.

Once your request has been received, we will respond in writing within 30 days.

# Cookies and other automated technology

A "cookie" is a small text file that is placed onto an Internet user's web browser or device and is used to remember and/or obtain information about the user. A "web beacon" is a small object or image that is embedded into a web page, application or email and is used to track activity. Web beacons are also sometimes referred to as pixels and tags.

We and/or third parties, including our service providers on our behalf, may use cookies, web beacons and other similar technology to collect information for the purposes described in this Policy, including analytics and monitoring performance and improvement of our Site (traffic, errors, page load time, popular pages, etc.). Before using these technologies to geolocate you or evaluate certain characteristics about you, such as your personal preferences, interests or online behaviour, we will ask for your permission by informing you how to enable such features.

We use Google Analytics to understand how our Site, services and products perform and how you use them. To learn more about how Google processes your data, visit <u>https://www.google.com/policies/privacy/</u>. To change your settings relating to cookies and other automated technology, visit our Cookie Manager.

# How to contact us

For information and questions about the use of your personal information or this Policy, you may contact our Privacy Officer at <u>privacy@pluscompany.com</u>.

# Changes to this Policy

This Policy may be revised from time to time for any reason. In such a case, we will notify you of such changes by indicating the date of the last update. Review the Policy before submitting personal information or using our Site, services or social media pages.