

Xera One Privacy Policy

Your privacy is important to Xeraflo Technologies Inc. dba Xera One Technologies and its affiliated companies and subsidiaries (“Xera”, “us”, “our”, “we”). This privacy policy (“**Privacy Policy**”) describes the Personal Information (defined below) we collect about you during your visits to the Xera One website (www.xeraone.com), the “Site” and collectively with any products or services provided thereon, the “Services”, how that information is used, with whom it may be shared, and what choices you have regarding the collection and distribution of the information.

Agreement

By visiting any of the Services or using any of the features available through them (including, by creating a user account, signing up for email messages, or authorizing payment, including recurring fees) you agree to the terms of this Privacy Policy and consent to our collection and use of the information we collect as outlined in this Privacy Policy and in the associated Terms of Use available at link.xeraone.com/terms-of-use (the “Terms”).

Scope

This Privacy Policy applies only to Personal Information. It does not cover data we collect that cannot be used to identify an individual or to pseudonymous data. Nor does it cover encoded or anonymized information or aggregated data which we collect or create about a group or category of services or features or about users which do not contain personally identifying information (“**Anonymous Information**”). We use Anonymous Information to analyze request and usage patterns so that we may enhance the content of our Services and to improve Site navigation. We reserve the right to use Anonymous Information for any purpose and to disclose such data to third parties in our discretion.

What is Personal information?

For the purposes of this Privacy Policy, we define “**Personal Information**” as your first and last name, your email address, your home or other physical address, including a street name and name of a city or town, your telephone number, your social security number, any payment or financial information, or any other identifier that permits us to contact a natural human person, like you, and/or any information that we maintain that could be used to identify you in combination with any of the identifying information described above.

Why do we collect Personal Information?

We collect and process Personal Information to improve our services, to deliver them to you, to perform obligations under contracts we have with you, and to comply with our own legal obligations. We also collect and process Personal Information to tailor your user experience, to send you information you have requested, to enforce our Terms, to perform research about your preferences and how you use our products and services, and to communicate with you about products and services that may be of interest to you. If

you do want to receive communications from us, you can opt-out, or if you want to review, correct, or remove Personal Information we have collected, you can do so by following the steps below, under “[Access to Information/Opt-Out](#).”

What Personal Information do we collect?

- **Information You Give Us:** We collect Personal Information when you voluntarily submit it to us. For example, when you register with a Site you will be asked to provide certain information (e.g. your name, email address, phone number, address, birth date, etc.). We may also ask you for additional government-issued identification or other information to validate your identity as required by our policies and procedures.
- **Automated Collection:** We automatically receive and store certain types of Personal Information when you visit the Services, such as the name of the domain and host from which you access the Internet; the IP address of the computer you are using and the browser and operating system you are using; information about any mobile device you use to access the Services including the hardware model, operating system and version, unique device identifiers and mobile network information; the date and time you access the Services; the Internet address of the website from which you linked to the Services; any search terms you used to find or navigate the Services; and your actions on the Services. This information will be treated as Personal Information if we combine or link it to any of the identifying information. Otherwise, this information constitutes aggregate information and is not covered by this Privacy Policy.
- **Cookies:** We may also automatically receive and store certain types of information when you visit the Services through the use of cookies or similar programs. A cookie is a small text file that is sent to your computer to collect information about your activities on the Services. Cookies do not contain any Personal Information and it is our policy not to track your Internet usage outside of our Services. If you do not want us to place cookies on your computer, you can modify your browser preferences to allow you to accept or reject all cookies or to notify you when a cookie is set. If you choose to reject all cookies, you may be unable to use certain areas of the Services. Please consult your browser instructions for information on how to modify your choices about cookies. Finally, you may delete any existing cookies manually from the hard drive of your device. For more information about cookies, please visit www.allaboutcookies.org.
- **Web Beacons:** The Services may contain small pieces of code to collect advertising metrics, such as counting page views, promotion views, or advertising responses. These are called Web beacons. We use these and Cookies to measure aggregate web statistics, including the number of monthly visitors, number of repeat visitors, most popular webpages and other information.
- **Log Data:** Our web servers may also collect “log data.” Log data provide aggregate information about the number of visits to different pages on the Services. We may use log data for troubleshooting purposes and to track which pages people visit to improve the Site. We do not link log data collected to Personal Information. Third-party vendors may also collect aggregate log data independently from us.
- **Social Media:** The Services may include social media features, such as the Facebook Like button and widgets like “Share This” buttons or interactive mini-programs that run on the Services. These features may

collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Services. Your interactions with these features are governed by the privacy policy of the company providing it.

- **Marketing emails:** We use third party service providers to send our marketing emails. There are no cookies in the email. However, when you click on a link to the Services included in the email, a persistent cookie is placed on your computer. This cookie is used to measure the effectiveness of our email marketing efforts and better understand how our users navigate through the Services. To that end, we collect a variety of information about how users interact with our marketing efforts, including how many times the email is opened and/or clicked, the browser type used, operating system, user email program, etc. The cookie set by our service providers will remain on your hard drive until you delete it.
- **Advertisements:** We use third party service providers to serve and host our advertisements. These third parties use persistent cookies to track the number of times the Services are accessed and whether they were accessed from the advertisement. The cookies generated from the advertisements do not contain Personal Information. If you do not want Personal Information about you used for this purpose, you may opt-out by following the procedure described below. Note, however, that where we use a third party to provide advertising, email marketing or similar services, each such third party will have its own opt-out process, which it will manage and control. You will need to follow those procedures to opt-out of the services they provide.
- **Analytics:** We may use third-party analytics companies (such as Google Analytics and Nielsen) and identity verification services. The information collected by these third parties may be used for purposes disclosed in their privacy policies, and by us to offer our Services.

How do we use Personal Information?

As above, we use Personal Information for a variety of purposes, including to comply with our legal obligations, to enforce our rights, and to deliver information to you about our products and services. For example, if you register with us, we may use Personal Information collected during registration to provide tailored information and resources to you based on specific areas of interest you have designated and your geographical location. We also use Personal Information to respond to questions you submit to us through the Services and perform functions as otherwise described to you at the time of collection. Additionally, we may use information to prevent and investigate potentially prohibited or illegal activities, to verify identity, determine eligibility to use the Services, for loss prevention, anti-fraud, and to enforce our Terms.

How we share information

We do not share, sell or transfer your personal information without your consent, except as described below:

- **Service providers and/or financial institutions:** We use third-party service providers (such as IDM Global, Inc.) to help operate our business. Examples include suppliers that host our data or provide customer service. Use of your personal information by our service providers is limited to the information they need to provide services on our behalf. For more information about how these service providers treat your personal information, or with any other comments, complaints or suggestions, contact us at the address below.

Xeraflop Technologies Inc.
Attention: Privacy Officer
68 East 1st Avenue – Fourth Floor
Vancouver, BC V5T 1A1
Email: privacy@xeraone.com

Affiliates: We may share some or all of your information with our related companies, including our affiliates, subsidiaries, or joint ventures who are also required to honor this Privacy Policy.

- **General:** To protect Xera One and its users, or for legal purposes, we may disclose your information: (a) if we think it is needed to detect, prevent or address illegal activity on our Services, or identify, contact or bring legal action against someone who appears to be causing injury to or interfering with our rights or property or other users; (b) as part of a Xera One legal matter or investigation, including an investigation related to a suspected breach of our Terms; (c) when we believe that disclosure is required or permitted by law, including when responding to subpoenas, warrants, production orders, or similar instruments; or (d) if we believe that disclosure is needed to prevent financial loss; protect your safety or the safety of others, including when there is an emergency involving potential harm, loss of security or serious injury to people or threats of such emergencies; or are obligated to report illegal activity.
- **Audits:** We may need to share your information in order to complete third party financial, technical and legal audits of our operations as part of that review.
- **Business Transactions:** We may share or sell your information in connection with a merger, financing, acquisition, dissolution transaction, bankruptcy or proceeding involving sale, transfer, divestiture of all or a portion of our business or assets. If another company acquires our business or assets, that company will have your information collected by us and will assume the rights and obligations regarding your information as allowed by this Privacy Policy.

- **Blogs:** The Services offer publicly accessible blogs and social forums where you may post information about yourself and your experience with our products. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them and may be used to send you unsolicited messages. To request removal of your Personal Information from our blog or social pages, contact us at privacy@xeraone.com. In some cases, we may not be able to remove Personal Information about you, in which case we will let you know if we are unable to do so and why. Alternatively, if you used a third-party application to post such information, you can remove it by logging into that application and removing the information, or by contacting the appropriate third-party application.

Do Not Track

We do not currently respond to “do not track” signals or other mechanisms that might enable you to opt out of tracking on our Site.

Third Party Websites

The Site may contain links to third-party websites. When you click on a link to any other website or location, you will leave the Site and go to another site, and a third-party may collect personal information or other information from you. We have no control over, do not review, and are not responsible or liable for, these third-party websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these third-party websites or their content, or to any collection of your personal information after you click on links to any such third-party websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are provided merely as a convenience and do not signify or imply our endorsement of, or association with, such third parties or their products, services, content, or websites. You use any such links and the products, services, and content accessed thereby at your own discretion and at your own risk.

Commercial Electronic Message Consent

By providing your email address to us through the Services, you affirmatively and expressly consent to receiving commercial emails from Xera One and those parties that process email communications on our behalf. These third parties may send you commercial emails to deliver the communication, to provide you with more information about available products you have purchased, and to provide you with updates, special offers, and other information, including but not limited to updates to the Services.

Access to Information / Opt-Out

You can unregister, or request access, updating and corrections of inaccuracies in other personal information we have by emailing or writing to us at privacy@xeraone.com. We may ask you for certain information in order to verify your identity.

We limit access to personal information we collect to only those employees who require such information to handle matters relating to compliance, identity verification and customer support.

Security

We have reasonable security measures in place to protect against loss, misuse and alteration of Personal Information under our control. No method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to safeguard Personal Information, we cannot guarantee or warrant the security of any information you disclose or transmit to us and you do so at your own risk.

To mitigate this risk, you should (a) use (when necessary) secure usernames and passwords and carefully protect them from disclosure and (b) implement updated internet security and virus protection on your computer. If you suspect that your computer's security or your information has been compromised or your password accessed or used by an unauthorized third party, please contact us immediately at privacy@xeraone.com.

If we become aware of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice through the Services if a security breach occurs. We may also send an email to you at the email address you have provided to use in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach via first class mail.

You should also be aware of how you handle and disclose Personal Information and should avoid sending Personal Information through insecure email.

Storing Personal Information

We will retain the Personal Information you give us or that we collect for as long as you maintain your account or subscription to our newsletters or other content, use any of our other services and for a reasonable time thereafter. We will retain and use Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Otherwise we will retain Personal Information for up to twenty-four (24) months and thereafter may store it in aggregate. If you'd like us to delete the information you have provided to us, please contact us at privacy@xeraone.com and we will respond in a reasonable time. Please note that some or all of this information may be required for you to make use of the services and features available via the Services. If you remove this information, you may no longer be able to use these features.

Data Transfers

We may transfer your Personal Information from Canada to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our business. Because of this, your personal information may be available to Canadian or another government or its agencies under a lawful order made in that country. The laws of those countries may be less strict regarding your personal information than the laws where you live. By providing any information to us, you consent to such transfer, storage, and processing.

Children's Privacy

We are committed to protecting the privacy of children. Persons under the age of 18 are not eligible to use the Services and must not attempt to register with the Services and/or submit any personal information to us. We do not knowingly collect personal information from anyone who is under the age of 18. If it comes to our attention that we have collected personal information from a person under 18, we will attempt to delete this information as quickly as possible. If you believe that we might have any personal information from a person under 18, please contact us at privacy@xeraone.com.

International Visitors

The Services are hosted in and provided from Canada and are intended for visitors located within Canada. If you use the Services from the European Union, USA, or other regions with laws governing data collection and use that may differ from Canada law, please note that you are transferring your Personal Information to Canada for storage and processing. Canada does not have the same data protection laws as the EU, USA, and some other regions. Also, we may transfer your data from Canada to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our business. By providing any information, including Personal Information, you consent to the transfer of that information to Canada and the use of your Personal Information, in accordance with this Policy.

Terms Applicable to Data from EU Member Countries

We are based in Canada. In most cases, the Personal Information we collect is stored and used in the Canada. While we do not direct our services to residents of the European Union (EU), it is possible that EU residents may access and use the Sites.

If we collect Personal Information from EU residents in a manner subject to the General Data Protection Regulation then, in addition to the above, the following terms shall also apply to our collection, use and retention of that information:

- **Basis for Collection:** As set out above, we collect and process Personal Information for which you have given your express consent at the time of collection. For example, we collect Personal Information when you elect to participate in one of our promotions. We also collect and process Personal Information to order improve our services, to deliver services and perform obligations under contracts we have with you, and to comply with our own legal obligations.

- **Sensitive Data:** We do not collect sensitive data, for example, biometric data, health data, or data revealing racial or ethnic origin, from visitors to the Sites.
- **Onward Transfer:** Except as otherwise provided in this Privacy Policy, we only disclose Personal Information to third parties who reasonably need to have access to it for the purpose of the transaction or activity for which it was originally collected or to provide services to or perform tasks on our behalf or under our instruction. All such third parties must agree to use the Personal Information we provide to them only for the purposes for which we have engaged them and they must agree to provide adequate protections for the Personal Information that are no less protective than those set out in this Privacy Policy. Where we have knowledge that an entity to whom we have provided Personal Information is using or disclosing Personal Information in a manner contrary to this Privacy Policy, we will take reasonable and appropriate steps to prevent, remediate or stop the use or disclosure.
- **Authorized Transfer:** We also may disclose Personal Information for other purposes or to other third parties when you have consented to or requested such disclosure. Please be aware that we will disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We are not liable for appropriate onward transfers of personal data to third parties.
- **Data Processors:** We may retain third parties to process or analyze personal Information we collect from the Sites. For example, a Site may be maintained or hosted by a third-party service provider, a promotion may be administered by a sales promotion agency, and/or products may be fulfilled by a wholesaler. These suppliers and other third parties who provide services for us are contractually obligated not to use Personal Information about you except as we authorize.
- **Profiling:** We may analyze Personal Information we have collected about you to create a profile of your interests and preferences so that we can contact you with information that is relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use Personal Information about you to detect and reduce fraud and credit risk.
- **Your Rights:** Your rights include: (a) a right to withdraw your consent to the processing of Personal Information about you to which you have previously given consent; (b) a right to object to processing of Personal Information about you for the purpose of direct marketing and other purposes based on our legitimate interest; (c) a right to request information about the Personal Information we collect, how we process it and with whom we share it; (d) a right, in some cases, to require erasure of the Personal Data about you stored with us; and (e) a right to have incorrect Personal Information about you corrected or removed. If you wish to exercise any of these rights, send an email to us at: privacy@xeraone.com.

If you request to have incorrect Personal Information removed, we may retain some of your Personal Information as necessary for the purposes of our legitimate business interests or in furtherance of public interests. Any Personal Information you have shared publicly with others may continue to be publicly visible on the Sites.

You also have the right to obtain a copy of the Personal Information you have provided to us, although we reserve the right to charge a fee for this depending on the nature and frequency of your request(s) and our cost to provide the information.

- **Questions and Complaints:** If you have questions or complaints regarding this Policy or our handling of your Personal Information, please contact privacy@xeraone.com. We will promptly investigate and attempt to resolve complaints and disputes in a manner that complies with the principles described in this Privacy Policy.
- **Enforcement and Disputes:** We commit to resolve complaints about your privacy and our collection or use of your Personal Information. If you do not receive timely acknowledgement of your request or have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact us at privacy@xeraone.com.

In addition to the above, you may complain to your home data protection authority and can invoke binding arbitration for some residual claims not resolved by other redress mechanisms. Contact details for the EU data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

Amendments to this Privacy Policy

We may modify this Privacy Policy from time to time as we deem necessary or appropriate due to changes in our business practices or changes in the law. If we decide to change this Privacy Policy, we will notify you of any material changes by email or by means of a notice on the Services, prior to the changes becoming effective so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. By using the Services after we post the modifications, you agree to them.

Last updated: November 9, 2018.