

## **PRIVACY POLICY – HIGHLIGHTS**

Developer Box Inc. and our corporate affiliates (the “**Company**”, “**we**”, “**us**”, “**our**”) understands that your time is valuable. Therefore, we have set out below some important highlights of our Privacy Policy. You can obtain more information about how we collect, use, disclose and protect your personal information by reviewing our full Privacy Policy below.

### **What personal information do we collect?**

- We collect personal information directly from users of our LinkedIn Lead Collection “LinkedIn Lead Collection”, and such other related websites and applications as may be made available by us from time to time (collectively, the “**Application**”). The personal information we collect includes your name, email address among others listed in our full Privacy Policy below. Users may also provide additional information by choosing to fill out forms and fields on our Application. We may also collect and generate information from your access and use of the Application such as performance data and data about the device you use to access the Application (the “**Usage Data**”).
- By using our Application you are choosing to provide us with your personal information and you acknowledge and consent to the processing of your personal information in Canada.

### **Why do we collect personal information and how is it used?**

- We collect personal information to facilitate your use of our Application, software and services.
- We also use the Usage Data in aggregate and de-identified form to improve the product and for research and evaluation purposes.

### **Is personal information shared or disclosed?**

- We also use certain third party service providers who may access to the information we collect.
- We may also disclose or share personal information for fraud prevention, and other disclosures permitted under applicable law.

### **How do we protect personal information?**

- We have implemented safeguards to protect personal information under our control, and regularly review our practices to ensure they align with reasonable practices appropriate to the level of sensitivity of the information, in order to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

### **What are the risks?**

- Although we take steps to safeguard the personal information under our control, "perfect security" does not exist online or elsewhere. In particular, we cannot guarantee the security of information posted or transmitted using our Application or via email with us. It is possible that third parties may unlawfully intercept or access such information.

**What are your choices?**

- You may request access to and review of your personal information in our possession, subject to certain limitations.
- You may also request that we correct your personal information in our possession. We will make best efforts to comply with such requests, subject to certain limitations.

**What else should you know?**

- We may use cloud services provided by third party service providers who may be outside Canada to store the personal information that we collect. This means that your information may be transferred to, or stored in, another country and accessible to foreign courts, law enforcement and national security authorities.
- We may amend our Privacy Policy from time-to-time. Although we will notify you of major changes, we encourage you to check for updates.
- You can contact us with questions, complaints or to access your personal information at [contact@developerbox.ca](mailto:contact@developerbox.ca).

## PRIVACY POLICY

Developer Box Inc. and our corporate affiliates (the “**Company**”, “**we**”, “**us**”, “**our**”) respect and uphold individual rights to privacy and the protection of personal information while balancing such rights with our need to process your personal information to manage our business and deliver our services to you. Based on applicable privacy and data protection principles common to Canada and other jurisdictions that we are subject to, we have developed this privacy policy (the “**Policy**”) to explain our practices for processing your personal information. This Policy does not apply to our employees’ personal information or any de-identified or anonymized information.

This Policy describes our practices with respect to how we may collect, use, disclose, retain, dispose and otherwise process (collectively, “**process**”) and how you may correct, update and access your personal information that you provide as a user of LinkedIn Lead Collection (collectively, the “**Application**”), excluding third party software, websites, or services that may interact with the Application or the Service (“**Third-Party Services**”), and the services we provide through the Application (collectively with the Application and excluding any Third-Party Services, the “**Service**”).

**PLEASE READ THIS PRIVACY POLICY CAREFULLY.** By using our Service, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to the processing of your personal information in Canada in accordance with this Policy and as may be further identified when the personal information is collected. If you are located or residing outside of Canada, please be aware that our Service is intended for and directed to users in Canada, and the privacy laws and principles in Canada may differ and not offer the same level of protection as those in your location or residing country. Through your continued use of our Service, you are transferring your personal information to Canada and you expressly consent to that transfer. We will use this consent as the legal basis for such data transfer, unless otherwise stated in this Policy.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any part of the Service or otherwise provide any personal information to us.

### 1. Personal Information

For the purposes of this Policy, “**personal information**” means any identifiable information about an individual, including but not limited to an individual’s name, home address, telephone number, email address, except any other information otherwise exempted by the applicable laws of Canada. For example, in Canada, personal information does not include any business contact information that is processed solely to communicate with that person about their employment or profession.

When you use our Service, we may collect the following personal information from you:

- Contact information such as name, email address, mailing address, and phone number;
- Unique identifiers such as username, account number, and password;
- Usage Data;

Your personal information may be collected when:

- You register for an account with us;
- You connect with us through social media;
- We collect data from third parties or publicly available sources.

We only collect personal information that we need. We encourage you to not provide us with any personal information beyond what is necessary and as requested by us.

#### *Collection from Third Parties*

We do not knowingly collect your personal information from third parties unless you consent or we are otherwise exempted, required or permitted by applicable laws to do so.

If we collect your personal information from a third party, we will only process that information for the specific purpose for which it was provided to us in accordance with this Policy and the policy under which that information was collected.

#### *Links to Other Sites*

To the extent that our Application contains links to Third-Party Services, the owners of those sites are responsible for the privacy practices or content of those other sites. We do not endorse and will not be responsible for the privacy practices on Third-Party Services.

#### *Information about Minors*

This site is intended solely for users who are not minors (18 years of age or older).

We do not knowingly collect personal information about any minor. No such minor, nor any parent or guardian as it relates to such minor, should submit such minor's personal information to us through the Service for any reason and under any circumstances.

## **2. Purpose for Which Personal Information is Processed**

We may process your personal information for the following purposes (the "**Purposes**"):

- To verify and authenticate your identity;
- To ensure that the Service is optimized for your use and benefit;
- To analyze user experience and improve the Service;
- To operate, maintain and provide to you the Service, including all features and functionality of the Application;
- To communicate with you to provide you services, contacts, materials and recommendations for your needs as identified by you through phone, email, or the Application;
- To carry out our obligations arising from any contracts entered into between you and us;

- To comply with internal policies and procedures and other legal, accounting, or security requirements;
- To share your personal information with our employees, contractors, consultants and other third party service providers such as application hosting providers, advertising agencies, payment processors or customer service agencies (“**Third-Party Processors**”) who require this information to assist us with establishing, maintaining and managing our relationship with you and optimizing and providing the Service for your use and benefit.

Please note that we may change or add Third-Party Processors at any time, in our sole discretion, either in Canada or elsewhere. We encourage you to reference this Policy from time-to-time, to obtain updated information. Given the nature of cloud services, personal information may be stored outside Canada, anywhere in the world, and may be accessible to foreign courts, law enforcement and national security authorities in the jurisdiction(s) where it is transferred or stored.

We will only process your personal information for the Purposes for which we intend to process such information. Otherwise, we will not process your personal information without your consent except where permitted by law.

### **3. Disclosure of Your Personal Information**

We may disclose your personal information for the Purposes as described in this Policy in the following ways:

- To our employees, contractors, and agents on an as-needed basis;
- To our Third-Party Processors; and
- To law enforcement, government or regulatory bodies, or other lawful authorities as required by law.

Your personal information that we collect may be processed outside of Canada but only in relation to the Purposes. As a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with other jurisdictions’ applicable laws.

### **4. Legal Basis for Processing Your Personal Information**

#### *Consent*

We will process your personal information only with your knowledge and consent, except where exempted, required or permitted by applicable laws. The form of consent may vary depending on the circumstances and the type of information being requested. Your consent may be express with clear options to say “yes” or “no”, such as by being asked to check a box to indicate your consent, or implied, such as when you provide us with your address through a form or email seeking information and we use those means to respond to your request. Your consent can also be provided by your authorized representative. Taking into account the sensitivity of your personal information, purposes of collection, and your reasonable expectations, we will obtain the form of consent that is appropriate to the personal information being processed. By using our Service, or otherwise by choosing to provide us with your

personal information, you acknowledge and consent to the processing of your personal information in accordance with this Policy and as may be further identified when the personal information is collected. When we process your personal information for a new purpose, we will document that new purpose and ask for your consent again.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any of the Service or otherwise provide any personal information to us.

You may refuse to provide consent or may notify us at any time that you wish to withdraw or change your consent to the processing of your personal information without penalty, subject to legal or contractual restrictions and reasonable notice by (i) changing your privacy preferences through the Application, (ii) deleting your account with the Application and stopping use of the Application, (iii) opting out of the use of your personal information by contacting our Privacy Officer (see Section 10 below). However, if you withdraw or change your consent, we may not be able to provide you with the Service.

#### *Other Legal Bases*

Aside from consent, we may also process your personal information under other legal bases, as permitted by applicable law.

### **5. Security of Personal Information**

The security of your personal information is important to us. We protect personal information using physical, technological and organizational safeguards. We regularly review our practices to ensure they align with reasonable industry practices appropriate to the level of sensitivity to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure; as such, despite our safeguards and protocols, we cannot fully guarantee the security of your personal information and you should always exercise caution when disclosing personal information over the Internet.

### **6. Requests for Access to and Correction of Personal Information**

Applicable privacy laws allow individuals the right to access and request the correction of errors or omissions in their personal information that is in our custody or under our control. You may request access to and review of your personal information in our possession. However, access may be declined where permitted or required by applicable law.

You may request that we correct your personal information in our possession. We reserve the right not to change any personal information if we do not agree that it is inaccurate or outdated, but will append any alternative text the individual concerned believes appropriate.

If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

## **7. Retention of Your Personal Information**

We generally keep personal information for only as long as it is needed to accomplish the purposes for which it was collected, or as needed for authorized or legitimate purposes. More specifically, we retain personal information as long as necessary for the fulfillment of the identified Purposes for its collection or as otherwise necessary to comply with applicable laws or protect our interests. When personal information is no longer necessary or relevant for the identified Purposes, or is required to be retained by applicable laws, we will take steps to have it deleted, destroyed, erased, aggregated or made anonymous. We use reasonable industry practices to ensure we have adequate controls, schedules and practices for information and records retention and destruction which apply to personal information.

## **8. Updates or Changes to this Policy**

This Policy was last updated on June 28, 2022. We will occasionally update this Policy and revise the "last updated" date appearing in this paragraph.

If we make any material changes we will either (a) notify you by email (sent to the email address listed in your account), or (b) provide a notice on the Application or otherwise through the Service before the change becomes effective. Any change to this Policy will apply to existing information, as well as information collected onwards from the date that this Policy is posted or on the date as specified in the notification. We encourage you to periodically review this page for the latest information on our privacy practices to ensure you are aware of any changes. Your continued use of the Service signifies your acceptance of any changes to this Policy.

## **9. Contact Information for Privacy Officer**

You can direct any questions or concerns regarding our compliance with this Policy and our processing of your personal information to our Privacy Officer by emailing [contact@developerbox.ca](mailto:contact@developerbox.ca).

If you are not satisfied with our Privacy Officer's response to your question or concern, you may be able to file a complaint under applicable privacy laws. Our Privacy Officer will provide you with the contact information to do so if requested. We strive to offer an accessible and simple complaint procedure. We will promptly investigate all complaints received, and if a complaint is justified, we will take the necessary steps to resolve the issue in question.

*End of Policy*