# NORTHSKY SOCIAL PRIVACY POLICY

# Last Updated: August 17, 2025.

Northsky's app is a social networking application and service ("**the Northsky App**") that runs on the Authenticated Transfer Protocol ("**AT Protocol**"). A summary of our privacy practices for the Northsky App is immediately below. You can read on for more detail. You can review the Northsky AT Protocol Network Services Privacy Notice here.

#### Overview

- **Profiles and Posts Are Public**. The Northsky App is a social networking application for public conversation, so any information you add to your public profile and the information you post on the Northsky App is public.
- **Direct Messages Are Private**. Content you sent to another Northsky user through Direct Messages is private between you and the user(s), however DM conversations are currently hosted with Bluesky PBLLC, not Northsky, and should be treated with appropriate caution.
- **Updates**. We may update this Privacy Notice from time to time. We will post these changes on the Site or in the Northsky App. We may also send you other notifications about these updates.
- **Personal Information We Collect**. We collect personal information such as your email and birth date when you provide it to us, when we collect it automatically through your use of the Northsky App Services (as defined in the Privacy Notice below), or when third parties provide it to us.
- How We Use Personal Information. We may use your personal information: (1) to provide the Northsky App Services; (2) for administrative purposes such as to improve the Northsky App; (3) for email contact and legal notice purposes; (4) with your consent; and (5) for other permissible purposes as requested by you or as allowed under applicable law.
- How We Disclose Your Personal Information. We may share personal information with third parties: (1) to provide the Northsky App; (2) to protect us or others; and (3) as required by Canadian law.
- Your Privacy Rights and Choices. You may be able to manage your preferences around communications from Northsky and other optional features offered via the Northsky App. In addition, some privacy laws grant individuals certain rights regarding their personal information.
- International Transfers. We may transfer personal information internationally.
- How Long We Keep Personal Information. We may keep your personal information as necessary to fulfill the purpose(s) for which we collected it.
- Supplemental Notices for Certain Jurisdictions. Certain jurisdictions may have additional requirements for our processing of your personal information.
- **Security**. We make reasonable efforts to protect your information.
- Children's Personal Information. The Northsky App is not directed to children.
- **Questions**? If you have any questions regarding our privacy practices, please contact us at: <a href="mailto:privacy@northskysocial.com">privacy@northskysocial.com</a>.

# **Northsky App Privacy Notice**

This Privacy Notice explains how Northsky Social Cooperative ("**Northsky**," "we," "us," or "our") collects, uses, and shares your personal information when you use the Northsky App, and how you can exercise your privacy rights.

This Privacy Notice applies to the personal information we process in connection with our website northskysocial.com ("**Site**") and the Northsky App. In this Privacy Notice, we refer to the Sites and the Northsky App as the "**Northsky App Services**".

The Northsky App runs on the AT Protocol. For information on how the AT Protocol processes personal information, please view the Northsky AT Protocol Network Services Privacy Notice.

**An Important Note**: This Privacy Notice only applies to the Northsky App Services and does not apply to other social media and microblogging applications (each, a "**Developer Application**") that operate on the AT Protocol. These Developer Applications may have their own privacy policies, which we encourage you to review before using them.

#### 1 Profiles and Posts are Public

If you create an account on the Northsky App, any information you add to your public profile and the information you post on the Northsky App will be public.

#### 2 Direct Messages are Private

Content you send to another Northsky user through Direct Messages is private between you and the user(s), however DM conversations are currently hosted with Bluesky PBLLC, not Northsky, and should be treated with appropriate caution

#### 3 Updates to this Privacy Notice

We may update this Privacy Notice from time to time at our sole discretion. If we do, we'll let you know by posting the updated Privacy Notice on the Site, to the Northsky App, and we may also send other communications.

# 4 Personal Information We Collect

The types of personal information we collect depend on how you interact with us, the Northsky App Services, and the requirements of applicable law.

#### (a) Personal information You Provide to Us Directly

We collect personal information that you provide to us.

(i) **Account Creation**. We collect personal information such as your email address, phone number, and username when you create an account with the Northsky App.

- (ii) **Your Communication with Us**. We may collect personal information, such as your name, email address, or phone number when you contact us.
- (iii) **Your Posts**. The Northsky App is a microblogging service that lets you post content and comment on other users' posts. We collect your posts. Your posts and comments are public, so exercise care when deciding what to share.
- (iv) **Payment Information**. When you make a purchase, a third party service provider that handles payments for us will receive your payment card information.
- (b) Personal Information We Collect Automatically.

We may collect personal information automatically when you use the Northsky App Services.

- (i) Usage Information. When you use the Northsky App Services, we collect certain information automatically, including your Internet protocol (IP) address (which can be used to derive your general location), user settings, cookie identifiers, mobile carrier, other unique identifiers, browser or device information, and Internet service provider (ISP). We may also collect personal information about your use of the Northsky App Services, such as the posts you view on the Northsky App, the links you click within the Northsky App, the frequency and duration of your activities, and other similar information.
- (ii) Cookie Policy (And Other Technologies). We and third parties that provide content or other functionality on the Sites and the Northsky App may use cookies, pixel tags, and other technologies ("Technologies") to automatically collect information when you use the Sites. You can block cookies by setting your internet browser to block some or all cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of the Sites and the Northsky App. You can change your browser settings to block or notify you when you receive a cookie, delete cookies or browse our Sites using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of cookies or similar technologies which store information on your device, you should change your browser settings accordingly. Where required by applicable law, you will be asked to consent to certain cookies and similar technologies before we use or install them on your computer or other device.
  - **Cookies**. Cookies are small text files placed on device browsers. Cookies store preferences and enable and enhance your experience. Below is an overview of the types of cookies we and third parties may use to collect information:
    - Strictly Necessary Cookies. Some cookies are strictly necessary to make our Northsky App Services available to you. We cannot provide you with our Northsky App Services without this type of cookies.
    - Analytical or Performance Cookies. We may also use cookies for website analytics purposes in order to operate, maintain and improve our Northsky

App Services. We may use our own analytics cookies or use third-party analytics providers.

#### (c) Personal Information We Collect from Other Sources

(i) **Third Parties.** We may collect personal information from third parties. For example, you may direct a Developer Application or other third-party social networking application to share personal information with us.

#### 5 How We Use Personal Information

We use your personal information for a variety of business purposes, including to provide the Northsky App Services, for administrative purposes, and to market the Northsky App Services, as described below.

- (a) **Provide Our Services**. We use personal information to fulfill our contract with you and provide you with the Northsky App Services, such as:
  - Managing your account;
  - Providing access to certain areas, functionalities, and features of the Northsky App Services;
  - Answering support requests; and
  - Communicating with you about your account, activities on the Northsky App Services, and policy changes.
- (b) **Administrative Purposes**. We use personal information for various administrative purposes, such as:
  - Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
  - Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and taking appropriate actions against malicious actors;
  - Measuring interest in, and engagement with, the Northsky App Services;
  - Creating de-identified and/or aggregated information;
  - Carrying out analytics;
  - Improving, upgrading, or enhancing the Northsky App Services;
  - Developing new products and services;
  - Ensuring internal quality control and safety;
  - Sharing personal information with third parties as needed to provide the Northsky App Services;
  - Enforcing our agreements and policies; and
  - Carrying out activities that are required to comply with our legal obligations.
- (c) **Marketing**. We may use personal information to provide you with direct marketing from Northsky. If you have any questions about our marketing practices, you may contact us using the information provided below.

- (d) **With Your Consent**. We also use your personal information for other purposes as requested by you or as permitted by applicable law.
- (e) **Other Purposes**. We also use your personal information for other purposes as requested by you or as permitted by applicable law.

#### 6 How We Share Personal Information

We will only disclose personal information to third parties for the purposes of providing Northsky App Services, to protect us or others, or as required to comply with Canadian law.

- (a) **Sharing to Provide the Northsky App Services**. The categories of third parties with whom we may share personal information are described below.
  - Your Posts and Public Profile. As noted above, the Northsky App is a microblogging service. Your posts and profile are public.
  - Other Users You Share or Interact With. The Northsky App may allow you to share personal information, messages, or interact with other users.
  - Third-Party Services You Share or Interact With. The Northsky App may link to or allow you to interface, interact, share information with, direct us to share information with, access and/or use third-party websites, applications, services, products, and technology (each a "Third-Party Service"). If you do, the information you share will be subject to the Third-Party Service's privacy policy. For example, if you request that your personal information be shared with another Developer Application, we may help facilitate that request.
  - Service Providers. We may share personal information with our third-party service providers and vendors. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- (b) Sharing to Protect Us or Others. We may access, preserve, and disclose any information we store if we, in good faith, believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) protect your, our, or others' rights, property, or safety; (iii) enforce our policies or contracts; (iv) collect amounts owed to us; or (v) assist with an investigation or prosecution of suspected or actual illegal activity.

# 7 Your Privacy Choices and Rights

- (a) **Your Privacy Choices**. The privacy choices you have about your personal information are determined by applicable law and are described below.
  - **Email Communications**. If you receive a marketing email from us, you may opt out by using the unsubscribe link at the bottom of such email. You will continue to receive transaction-related, non-promotional emails related to the Northsky App Services. You will not be opted out of those communications.
  - **Mobile Devices**. We may send you push notifications through our App when you enable them. You may opt out from receiving these push notifications by changing the settings on your mobile device. We may collect precise location-based

- information via our App, but only if you permit us to do so. You may opt out of this collection by changing the settings on your mobile device.
- "Do Not Track." Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we currently do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers, as there is no consistent industry standard for compliance.
- (b) **Your Privacy Rights**. Depending on what laws apply to your personal information, you may have the right to:
  - Request Access to and Portability of Your Personal Information, including: (i) obtaining access to or a copy of your personal information; and (ii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine-readable format (also known as the "right of data portability");
  - Request Correction of your personal information where it is inaccurate, incomplete, or outdated. In some cases, we may provide self-service tools that enable you to update your personal information;
  - Request Deletion, Anonymization or Blocking of personal information including when processing is based on your consent, or when processing is unnecessary, excessive or noncompliant (also known as the "right to be forgotten").
  - Request to Opt-Out of Certain Processing Activities if we engage in certain data processing activities that give you a right of opt-out under applicable privacy laws;
  - Request Restriction of or Object to our processing of your personal information;
  - **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.
  - **Be Informed** about third parties with which your personal information has been shared; and
  - Request the Review of Decisions Taken Exclusively Based on Automated Processing if these decisions could affect your rights under applicable data protection laws.

Please contact us using the information below if you would like to exercise any of these rights. We will process your requests in accordance with applicable laws. Before fulfilling your request, we may ask you to provide reasonable information to verify your identity. Please note that there are exceptions and limitations to each of these rights, and that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain information for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so. Some laws may allow you to appeal our decision if we decline to process your request. If applicable laws grant you an appeal right, you may send us your appeal using the contact information below.

If your personal information is subject to the applicable data protection laws of Brazil, the European Economic Area, Switzerland, or the United Kingdom, and you believe our processing of your personal information violates applicable law, you have the right to lodge a complaint with the competent supervisory authority.

- Autoridade Nacionalde Proteçãode Dados (ANPD)
- EEA Data Protection Authorities (DPAs)
- Swiss Federal Data Protection and Information Commissioner (FDPIC)
- UK Information Commissioner's Office (ICO)

# 8 International Transfers of Personal Information

We may transfer, process, and store all personal information we collect anywhere in the world. Some countries may have data protection laws that are different from the laws where you live.

If we transfer personal information from the European Economic Area, Switzerland, and/or the United Kingdom to a country that does not provide an adequate level of protection under applicable data protection laws, we will do so based on safeguards such as the European Commission-approved or UK Government-approved Standard Contractual Clauses, or otherwise in accordance with applicable data protection laws.

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

# 9 How Long We Keep Personal Information

We keep the personal information we collect for as long as you use the Northsky App Services, or as necessary to fulfill the purpose(s) for which we collected it. There are also other reasons why we may keep personal information. They may include, but are not limited to, providing the Northsky App, resolving disputes, establishing legal defenses, conducting audits, pursuing legitimate business purposes, enforcing our agreements, and complying with applicable laws. When determining the retention period, we take into account various criteria, such as the type of products and services requested by or provided to you, the nature and length of our relationship with you, the impact on the Northsky App Services we provide to you if we delete some personal information from or about you, mandatory retention periods provided by law, and any relevant statute of limitations.

#### 10 Supplemental Notice for Certain Jurisdictions

(a) **Supplemental Notice for EU/UK GDPR**. This Supplemental Notice for EU/UK GDPR only applies to our processing of personal information that is subject to the EU or UK GDPR. Personal information means any information relating to an identified or identifiable individual. If you do not provide your personal information when requested, you may not be able to use our Northsky App Services if that personal information is necessary to provide you with our Northsky App Services or if we are legally required to collect it.

We process personal information when we have a valid legal basis, including as set forth below:

- **Performance of a Contract**. Northsky may need to process your personal information where required to perform our contract with you, namely the Terms of Service, and for the purposes described in Section 4(a) of this Privacy Notice.
- Legitimate Interest. Northsky may process your personal information where we or a third party have a legitimate interest, including the purposes in Section 4(b) of this Privacy Notice. We only rely on our or a third party's legitimate interest to process your personal information where these interests are not overridden by your interests or fundamental rights and freedoms.
- **Consent**. In some cases, Northsky may also rely on your consent to process your personal information.
- Compliance with our Legal Obligations. Northsky may process your personal information to comply with our legal obligations. For example, we may process your personal information to comply with tax, labor, and accounting obligations.

If you have any specific question about how Northsky complies with GDPR requirements or uses your personal data, you can contact us at <a href="mailto:admin@northskysocial.com">admin@northskysocial.com</a>.

# 11 Security

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as our Services are hosted electronically, we can make no guarantees as to the security or privacy of your information.

#### 12 Children's Personal Information

The Northsky App Services are not directed to children under 13 (or other age as required by local law outside of Canada). We do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us using the information provided below.

# 13 Contact Us

Northsky is the controller of the personal information we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your privacy rights listed in this Privacy Notice, please contact us at <a href="mailto:privacy@northskysocial.com">privacy@northskysocial.com</a>.