

## Privacy Policy

This Privacy Policy (the “Policy”) describes the practices of Group Imi / Le Groupe Imi (referred to as "we," "us," or "our") regarding the collection and use of personal data when you access Oniooo.com (the “Site”), which is operated by Group Imi, or utilize the Oniooo services, applications, or platform through the Site, Discord servers administered by us, or by any other means (collectively, the “Services”). Oniooo.com operates as a communications technology incubator that provides artificial intelligence services aimed at augmenting human creativity and fostering social connections.

This Privacy Policy takes into account the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Act respecting the protection of personal information in the private sector (Quebec). In addition to Quebec laws, individuals located in the European Union or European Economic Area (EU) may also have rights under the General Data Protection Regulation 2016/679, and individuals located in the United Kingdom (UK) may have rights under the General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together, the GDPR). Appendix 1 outlines the details of the additional rights of individuals located in the EU and UK as well as information on how we process the personal information of individuals located in the EU and UK.

*This PrivacyPolicy was last updated on July 20<sup>th</sup> 2024*

### **The information we collect**

**Personal information:** is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including your full name, age, profession, and gender.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details (through our third party payment processor, who stores such information and we do not have access to that information).
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies), and communications with our website.
- **Profile Data** including your username and password for Oniooo profile picture, purchases or orders you have made with us, content you post, send receive and share through our platform, information you have shared with our social media platforms, and support requests you have made.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Sensitive information** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information. We do not actively request sensitive information about you. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law.

## How we collect personal information

We collect personal information in a variety of ways, including:

- when you provide it directly to us, including face-to-face, over the phone, over email, or online;
- when you complete a form, such as registering for any events or newsletters, or responding to surveys;
- when you use any website, we operate (including from any analytics and cookie providers or marketing providers. See the “Cookies” section below for more detail on the use of cookies);
- from third parties, or
- from publicly available sources.

### Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

<b>Purpose of use / disclosure</b>	<b>Type of Personal Information</b>
To enable you to access and use our platform, including to provide you with a login.	Identity DataContact Data
To contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us.	Identity DataContact DataProfile Data
To contact and communicate with you about any enquiries you make with us via any website we operate.	Identity DataContact Data
For internal record keeping, administrative, invoicing and billing purposes.	Identity DataContact DataFinancial DataTransaction Data
For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.	Profile DataTechnical and Usage Data
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	Identity DataContact DataTechnical and Usage DataProfile DataMarketing and Communications Data
To run promotions, competitions and/or offer additional benefits to you.	Identity DataContact DataProfile DataInteraction

	DataMarketing and Communications Data
If you have applied for employment with us, to consider your employment application.	Identity DataContact DataProfessional Data
To comply with our legal obligations or if otherwise required or authorised by law.	Any relevant Personal Information
<b>Sensitive information:</b> We do not actively request sensitive information about you. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law	Sensitive Information

### Our disclosures of personal information to third parties

- **Personal information:** We will only disclose personal information (excluding sensitive information) to third parties where it is necessary as part of our business, where we have your consent, or where permitted by law. This means that we may disclose personal information (excluding sensitive information) to:
  - our employees, contractors and/or related entities;
  - IT service providers, data storage, web-hosting and server providers;
  - marketing or advertising providers such as Mailchimp;
  - professional advisors, bankers, auditors, our insurers and insurance brokers;
  - payment systems operators or processors;
  - our existing or potential agents or business partners;
  - sponsors or promoters of any promotions or competition we run;
  - if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred;
  - courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
  - courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
  - third parties to collect and process data, such as analytics providers and cookies; and
  - any other third parties as required or permitted by law, such as where we receive a subpoena.

- **Sensitive information:** We will only disclose sensitive information with your consent or where permitted by law. This means that we may disclose sensitive information to:
  - our employees, contractors and/or related entities;
  - IT service providers, data storage, web-hosting and server providers;
  - professional advisors;
  - if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred;
  - courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
  - third parties to collect and process data, such as analytics providers and cookies; and
  - any other third parties as required or permitted by law, such as where we receive a subpoena.
- **Google Analytics:** We have enabled Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together. These cookies and identifiers may collect Technical and Usage Data about you.
- You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalized ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#).
- To find out how Google uses data when you use third party websites or applications, please see [here](#).

## Overseas disclosure

We store your personal information in Quebec. Where we disclose your personal information to third parties, those third parties may store, transfer or access personal information outside of Quebec. We will only disclose your personal information overseas in accordance with the Quebec Privacy Principles.

Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.

## **Storage and security**

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorized access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

## **Cookies**

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognize you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

## **Links to other websites**

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## **Personal information from single sign-on accounts**

If you connect your account with us using a single sign-on account, such as Google, Discord, Outlook, we will collect your personal information from the single sign-on provider. We will do this in accordance with the privacy settings you have chosen with that provider.

The personal information that we may receive includes your name, ID, user name, handle, profile picture, gender, age, language, list of friends or follows and any other personal information you choose to share.

We use the personal information we receive from the single sign-on provider to create a profile for you on our platform.

## **Use of Google API Services (this section applies to personal information accessed through Google API Services)**

We use Google's Application Programming Interface (**API**) Service to collect non-identifiable analytics data.

Our use of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements (set out in the Google API Services User Data Policy).

We limit our use of the personal information that we collect to providing or improving our business. We do not use the personal information for any other purposes.

We only transfer the personal information to others if it is necessary to provide or improve our business or as necessary to comply with applicable law or as part of a merger, acquisition or sale of assets where we notify you of this.

We do not use or transfer the personal information for serving ads, including retargeting, personalized or interest-based advertising.

We don't allow humans to read the personal information unless



- we have first received your consent to view specific messages, files or other data;
- it is necessary for security purposes (such as investigating a bug or abuse);
- our use is limited to internal operations and the personal information (including derivations) have been aggregated and anonymized.

These restrictions apply to the raw data we obtain from the restricted scopes and data that is aggregated, anonymized or derived from them.

We have policies and procedures in place setting out appropriate safeguards for protecting your personal information obtained with the Google APIs. We will also ensure that our employees, agents, contractors and successors comply with the Google API Services Data Policy.

## **Amendments**

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

**For any questions or notices, please contact us at:**

Group Imi / Le Groupe Imi

Email: [melody@oniooo.com](mailto:melody@oniooo.com)

## **APPENDIX 1: ADDITIONAL RIGHTS AND INFORMATION FOR INDIVIDUALS LOCATED IN THE EU OR UK**

Under the GDPR individuals located in the EU and the UK have extra rights which apply to their personal information. Personal information under the GDPR is often referred to as personal data and is defined as information relating to an identified or identifiable natural person (individual). This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as information on how we process the personal information of individuals located in the EU and UK. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

## What personal information is relevant?

This Appendix applies to the personal information set out in the Privacy Policy above. This includes any Sensitive Information also listed in the Privacy Policy above which is known as 'special categories of data' under the GDPR.

## Purposes and legal bases for processing

We collect and process personal information about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

<b>Purpose of use / disclosure</b>	<b>Type of Data</b>	<b>Legal Basis for processing</b>
To enable you to access and use our Platform, including to provide you with a login.	Identity DataContact Data	Performance of a contract with you
To contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us.	Identity DataContact DataProfile Data	Performance of a contract with you
To contact and communicate with you about any enquiries you make with us via our website.	Identity DataContact Data	Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions

For internal record keeping, administrative, invoicing and billing purposes.	Identity Data Contact Data Financial Data Transaction Data	Performance of a contract with you To comply with a legal obligation Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our terms of business and any other administrative points
For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.	Profile Data Technical and Usage Data	Legitimate interests: to keep our website updated and relevant, to develop our business, improve our business and to inform our marketing strategy
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	Identity Data Contact Data Technical and Usage Data Profile Data Marketing and Communications Data	Legitimate interests: to develop and grow our business
To run promotions, competitions and/or offer additional benefits to you.	Identity Data Contact Data Profile Data Interaction Data Marketing and Communications Data	Legitimate interests: to facilitate engagement with our business and grow our business
If you have applied for employment with us, to consider your employment application.	Identity Data Contact Data Professional Data	Legitimate interests: to consider your employment application
To comply with our legal obligations or if otherwise required or authorised by law.		To comply with a legal obligation

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer doing business with us. Further information about your rights is available below.

## **Data Transfers**

The privacy protections available in the countries to which we send data for the purposes listed above may be less comprehensive than what is offered in the country in which you initially provided the information. Where we transfer your personal information outside of the country where you are based, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal information in accordance with this Privacy Policy and Appendix 1. This includes:

- only transferring your personal information to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal information; or
- including standard contractual clauses in our agreements with third parties that are overseas.

## **Data retention**

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## **Extra rights for EU and UK individuals**

You may request details of the personal information that we hold about you and how we are process it (commonly known as a “data subject request”). You may also have a right in accordance with applicable data protection law to have your personal information rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorized transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organization.