



Kepler™ Platform Privacy Policy

Last Updated: October, 2021

At Stradigi AI Inc. (“Stradigi AI”, “we”, “our” or “us”), we highly value your privacy. We are committed to ensuring the information we collect about you remains secure and protected when providing services to you. Personal Information is only collected, used or disclosed by us in accordance with this privacy policy (the “Privacy Policy”).

The following sets out the manner with which we collect, use and disclose Personal Information (as defined below) through your access to and use of our proprietary artificial intelligence platform Kepler™.

1. PERSONAL INFORMATION WE COLLECT

“Personal Information” is information about an identifiable individual and any information that allows that person to be identified. Personal Information that Stradigi AI may collect from you may include the following:

- a. your name, email address and phone number;
- b. your IP (Internet protocol) address, unique personal identifiers or account name;
- c. your location information, such as your postal or zip code, the approximate geographic area provided by your Internet service provider (“ISP”);
- d. information about your use of the services we provide to you pursuant to the Kepler Platform Agreement between you, your employer or the entity you represent and us (the “Agreement”);
- e. customer relationship information such as customer requests and feedback and other information you provide, such as reporting a problem with our platform or the fact that and the extent to which we provided you with customer support; and
- f. information contained in any communication you send to us; such correspondence data may include the content of the communication and the metadata associated with the communication generated using our platform’s contact forms.

2. WHY DO WE COLLECT PERSONAL INFORMATION

We collect Personal Information to enable us to provide, manage and develop our business and operations, including:

- a. to establish, maintain and manage relations with you so that we may provide you with services pursuant to the Agreement;

- b. to review the services we provide to you so that we may understand your requirements and improve our services;
- c. to help us understand your activity on our platform and to monitor and improve our platform;
- d. to inform you of services other than those to be provided pursuant to the Agreement;
- e. to comply with your requests (for example, if you prefer to be contacted at a business or residential phone number and advise us of your preference, we will use this information for that purpose);
- f. to protect us against error, fraud, theft and damage to our property;
- g. to comply with applicable law or regulatory requirements; and
- h. as otherwise permitted by law.

3. HOW WE USE THE PERSONAL INFORMATION WE COLLECT

You may not access and use our platform without submitting Personal Information. We use and disclose your Personal Information to:

- a. identify you;
- b. allow you to access and use our platform;
- c. respond to your inquiries, comments or requests; and to
- d. facilitate the operation or maintenance of our platform, our services, our operations and internal record keeping.

4. HOW WE DISCLOSE THE PERSONAL INFORMATION

We will not use or disclose your Personal Information except as described in this Privacy Policy. We do not sell Personal Information.

Further to the foregoing uses, your Personal Information may also be shared with Stradigi AI's employees, agents, representatives and selected third-party service providers in Canada and the United States ("US") who require this information to perform services on our behalf in connection with access to and use of our platform, or to facilitate reporting of analytics. These service providers are under an obligation to Stradigi AI to use Personal Information only for the purposes of providing services to us and to use reasonable care to keep your Personal Information confidential.

Stradigi AI reserves the right to disclose your Personal Information to a third party in the event of a transfer of all or substantially all of its assets to this third party (including transfers made as part of insolvency or bankruptcy proceedings) or as part of a corporate reorganization or change in corporate control.

Stradigi AI and our Canadian and American service providers may disclose your Personal Information without your consent if compelled to do so by a court or body with jurisdiction to compel the disclosure of information, to an investigative body in

the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable Canadian, European Union or US law. We may also disclose Personal Information where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons and property.

5. NON-PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

We collect information that does not identify you personally but is linked to the computer you use to access and use our platform, such as type and model, operating system (e.g. Windows, OS) and browser (e.g. Chrome, Safari).

Cookies: Our platform uses a technology called "cookies". A cookie is a tiny element of data that our platform can send to your browser, which may then be stored on your hard drive so we can recognize you when you return. We use cookies to help us understand which areas of our platform are most and least useful and which need improvement. You may set your Web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our platform, you may not be able to take full advantage of all of the features of our platform.

Tracer Tags & Web Beacons: Our platform may also use a technology called "tracer tags" or "Web beacons". This technology allows us to understand which pages you visit on our platform and are used to help us improve and optimize our platform.

Metadata: We collect certain metadata generated by our platform related to your use of our platform, such as application logs to be used for troubleshooting purposes, for statistical purposes and in order to understand your use of our platform in order to improve and optimize it.

Users' Activity: We also record and keep track of users activity on our platform, such as movement of the mouse or on the "track-pad" that users make to help us understand your use of the platform in order to improve and optimize it.

6. YOUR RIGHTS

You have the right to access, update correct inaccuracies in and object to our processing of your Personal Information in our custody and control, subject to certain exceptions prescribed by law. You may do so by writing to us at the contact information set out below or sending an e-mail message to our Privacy Officer (see Section 14), explaining your request and provide any relevant confirmation or reference number. We may request certain Personal Information for the purposes of verifying the identity of the individual seeking access to his or her Personal Information records. You will be informed of the measures taken following your request as soon as possible.

You also have the legal right to file a complaint with a supervisory authority responsible for data protection if you consider that our processing of your Personal Information infringes data protection laws.

Stradigi AI will take the necessary measures to facilitate the exercise of your right to access, complain, rectify or obtain Personal Information. You can always obtain confirmation from us that Personal Information about you is being processed.

7. LINKS TO THIRD PARTY WEBSITES

This Privacy Policy only applies to our platform and does not apply to our website (www.stradigi.ai) and to third party websites suggested on our platform. If you click on a link to a third-party website, this Privacy Policy will not apply to your Personal Information collected on that third-party website. Stradigi AI will have no responsibility or liability for the content and privacy practices of any such linked website. We encourage you to be aware of this when you click on a link and leave our platform, and to read the privacy policies of every website that collects Personal Information from you.

8. DATA UPLOADED TO OUR PLATFORM

You can upload data or datasets to our platform to be processed by our algorithms pursuant to the Agreement. Such data or datasets may contain Personal Information which are protected by laws. Stradigi AI is not responsible or otherwise liable for the lawfulness of the collection and of the processing of such data. You have the sole responsibility to ensure that the collection and processing of such data on our platform comply with applicable laws.

9. ACCEPTANCE AND CONSENT

Your consent is important to us. Depending on the sensitivity of your Personal Information, your consent may be express or implied. Express consent may be given orally, electronically, or in writing. Implied consent is consent that can reasonably be inferred from your actions (for example, when you voluntarily provide us with your Personal Information), such as giving us your email address.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice by contacting Stradigi AI using the contact information below (see Section 14). In some circumstances, a change or withdrawal of consent may limit our ability to provide services to you.

10. RETENTION OF PERSONAL INFORMATION

We retain Personal Information about you as long as the Agreement is in force and only for as long as is necessary to fulfill the purposes for which it was collected, to meet legal retention requirements and for as long as necessary to protect our legitimate business interests and to allow you to exhaust the resources provided by law.

11. PROCESSING OF PERSONAL INFORMATION OF PERSONS WITHIN THE EUROPEAN ECONOMIC AREA (EEA) AND/OR EUROPEAN UNION (EU)

We comply with the provisions of the General Data Protection Regulation (GDPR). This section 11 applies exclusively to the processing of Personal Information in relation to the EEA and the EU, insofar as such processing takes place while the data subjects are in the EU or the EEA and when the processing activities are related to the provision of services or to the monitoring of the behaviour of these persons, insofar as it concerns behaviour taking place within the EEA or the EU. The other provisions of this Privacy Policy which are not contrary to the provisions of this Section shall apply mutatis mutandis. In the event of a conflict between this section 11 and the rest of the Privacy Policy, the provisions of this section shall prevail.

11.1 CONSENT

If your consent is provided in a written statement that deals with other matters, we will ensure that the request for consent to process Personal Information is clearly separate.

11.2 AUTOMATED INDIVIDUAL DECISION MAKING

We recognize that you have the right to know whether your Personal Information is processed by an automated decision-making system. We do not use any such system.

11.3 PRIVACY IMPACT ANALYSIS

We will conduct an impact analysis regarding the protection of Personal Information before implementing new technologies that are highly likely to infringe on your rights and freedoms, including your right to privacy.

11.4 RIGHTS TO ERASURE

When the law so provides, you have the right to request that we proceed with the withdrawal and deletion of Personal Information as soon as possible.

11.5 ACCURACY AND PROTECTION

Before collecting Personal Information, we will implement appropriate technical and organizational measures to ensure the protection of Personal Information.

We will only share Personal Information with agents, mandataries, consultants, data processing companies or external service providers when they assure us that appropriate measures have been put in place to protect Personal Information. These third parties are prohibited from using your Personal Information for any purpose other than in connection with the service they provide to us and do not further collect, sell, or use your Personal Information except as necessary to perform the service they provide to us.

11.6 ACCOUNTABILITY

We ensure that we are responsible for the protection of Personal Information and that we are able to demonstrate Stradigi AI's compliance with the GDPR when processing Personal Information.

12. PROCESSING OF PERSONAL INFORMATION OF PERSONS RESIDING IN THE STATE OF CALIFORNIA, UNITED STATES OF AMERICA

We comply with the provisions of the California Consumer Privacy Act. This section 12 applies exclusively to the processing of Personal Information in relation to persons residing in the State of California who use our platform. The other provisions of this Privacy Policy which are not contrary to the provisions of this Section shall apply mutatis mutandis. In the event of a conflict between this section 12 and the rest of the Privacy Policy, the provisions of this section shall prevail.

12.1 SALE OF PERSONAL INFORMATION

We do not sell your Personal Information. As previously mentioned, your Personal Information may be disclosed to Stradigi AI's agents, representatives and selected third-party providers of data processing and storage in Canada and the USA who require this information to perform services on our behalf in connection with our platform, or to facilitate the reporting of analytics. These third parties will be under an obligation to Stradigi AI to use reasonable care to keep this information confidential, are prohibited from using your Personal Information for any purpose other than in connection with the service they provide to us and do not further collect, sell, or use your Personal Information except as necessary to perform the service they provide to us.

12.2 RIGHT TO DELETION

When the law so provides, you have the right to request that we proceed with the withdrawal and deletion of Personal Information as soon as possible.

12.3 RETENTION OF PERSONAL INFORMATION

We retain Personal Information about you as long as the Agreement is in force and only for as long as is necessary to fulfill the purpose for which it was collected, to meet legal retention requirements, for as long as necessary to protect our legitimate business interests and to allow you to exhaust the recourses provided by law..

13. GENERAL

Stradigi AI further undertakes to comply with the Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act (the “Canada Anti-Spam Act”) in providing its services to you.

14. CONTACT INFORMATION

Please contact our Privacy Officer if you have any questions or comments about this Privacy Policy, or if you wish to access, update, object to our processing of your Personal Information, correct inaccuracies or erase your Personal Information, or alter your consent, or if you otherwise have a question or complaint about the manner in which we treat your Personal Information, at the address below:

C/O Privacy Officer, Legal Department

1470 Peel Street, Tower A, Suite 1050

Montreal, Quebec H3A 1T1

Email : privacy@stradigi.ai

15. AMENDMENT TO THIS PRIVACY POLICY

Stradigi AI reserves the right to modify the content of this policy at any time. You can keep a copy of this Policy by printing it. The most recent version of this Policy will at all times be posted on our Website.