

*PRIVILEGED/CONFIDENTIAL
ATTORNEY WORK PRODUCT
ATTORNEY CLIENT COMMUNICATION*

Website Privacy Policy

Effective Date: September 1, 2022

<u>CONSENT</u>	<u>DEFINITION</u>	<u>COLLECTION/USE</u>	<u>AUTOMATED COLLECTION/ ADVERTISING</u>	<u>DISCLOSURE</u>
<u>SECURITY</u>	<u>TRANSFERS OUTSIDE CANADA</u>	<u>RETENTION</u>	<u>YOUR CHOICES</u>	<u>UPDATES</u>
<u>CONTACT US</u>				

Shift Marketing Studio Inc. (“**Shift**”, “**we**”, “**our**”) operates the following websites: shiftmarketing.io; fundraising.shiftmarketing.io; automotive.shiftmarketing.io; and fromyourfriends.com (together the “Sites”).¹ Shift prides itself on its privacy practices. We are committed to being transparent about the personal information we collect, the manner in which such personal information is used by us, and the circumstances in which some of your personal information may be disclosed. To help us meet this commitment to you, we have created this Website Privacy Policy (this “**Privacy Policy**”) and have appointed a Privacy Officer to ensure that any personal information you provide to us using any of our Sites, or that we collect from you during your use of any of our Sites, is only collected, used, and disclosed in accordance with this Privacy Policy. References to “you” and “your” throughout this Privacy Policy are to you as the individual to whom the personal information relates. Please note that this Privacy Policy applies only to the collection and use of information that Shift obtains from you when you use our Sites or when you otherwise submit information to us through the Sites. Shift maintains a more detailed privacy policy for its customers whose data Shift aggregates, hosts, and processes as part of the services Shift provides to its customers. That privacy policy is provided directly to Shift’s customers.

Your Consent

This Privacy Policy governs how Shift and its affiliates collect, use and disclose personal information when you use any of our Sites or submit information to us through any of our Sites. You should review this Privacy Policy carefully, and be sure you understand it, prior to using our Sites or otherwise providing any information to Shift through the Sites. Your use of the Sites, providing any information to us through the Sites, or any other indication of your assent is deemed to be acceptance by you of this Privacy Policy, which may be amended from time-to-time (please see the “Updates to this Privacy Policy” section below). If you do not agree to this Privacy Policy, or any such amended Privacy Policy, you should not use, and should immediately terminate your use of, the Sites and not otherwise provide any information to Shift.

Meaning of Personal Information

For the purposes of this Privacy Policy, “personal information” means information that relates to an individual and that identifies, or can be used in conjunction with other readily-accessible information to identify, such individual (including, but not limited to, name, e-mail address, physical address, or phone number).²

The Personal Information We Collect and How We Use It

Except as otherwise provided in this Privacy Policy, the personal information we collect from you is comprised entirely of the information you provide to us. We may collect and use personal information from you as follows:

How & What We Collect	How We Use It
<p><i>Requesting a Demo, Contact Us or Information Request:</i> When you request a demo, contact us, request information from us, or otherwise use any of our Sites, we may collect your name, email address, phone number, company name, industry and other general information.</p>	<p>We will only use this information to set up a demonstration and/or contact you to follow up and provide the information requested.</p>

Automated Collection of Information and Interest-Based Advertising

We may use cookies, clear GIFs, third-party analytics and other tracking mechanisms to track your use of our Sites. As you use any of our Sites, these tracking mechanisms may automatically collect information from you such as: your IP address, browser type and operating system; web pages you view; links you click; how you move through the Sites including the length of time you use them or particular features or pages of the Sites; and the referring URL, or the webpage that led you to our Sites. We may combine this information with other personal information we collect about you for statistical purposes, for measuring effectiveness of advertising, and for fraud detection.

We also use these tools to provide you with a more personalized user experience, to better understand your needs and preferences, and to monitor trends respecting the usage of our Sites.

Do-Not-Track. Currently, our systems do not recognize browser “do-not-track” requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies or opting out of ad networks as described further in this section).

Cookies. Cookies are pieces of information that are transferred from our Sites to your computer’s hard drive and they may serve a variety of purposes. Web beacons, flash cookies and other similar technologies may also be used for these purposes. For example, cookies “remember” you when you return to a website and make your experience more user-friendly. Cookies identify which web pages are visited and how often. Cookies are also used to allow companies to better understand how their website is used to improve their services.

How to disable or delete cookies

If you want to prevent your browser from accepting cookies, if you want to be informed whenever a cookie is stored on your computer or if you want to delete cookies from your computer, please make the necessary changes in your Internet browser settings.

If you disable or delete cookies in your Internet browser settings, you might not be able to access important functions or features, you will be required to re-enter your log-in details, and your use of the Sites may be limited.

Please note that if you clear all cookies on your browser, or use a different browser or computer, you will need to complete the opt-out procedure again.

Clear GIFs. Clear GIFs (a.k.a. web beacons, web bugs or pixel tags) are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, though, clear GIFs are embedded invisibly on web pages, not stored on your hard drive. These “images” are automatically loaded to

your browser/device when you visit our Sites or open an html format email message from us, thereby letting us know if a certain Site or page was visited or an email message was opened. Clear GIFs allow us to record simple user actions related to our Sites and the email communications you receive from us, to help us determine the usage and effectiveness of our Sites and communications. We might use clear GIFs to track the activities of our visitors and app users, help us manage content, and compile statistics about usage. We and our third party service providers also might use clear GIFs in HTML e-mails to our customers, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded. These can be blocked either by using a third party application such as Ghostery (<https://www.ghostery.com>), or, in the case of emails, by changing your settings to prevent images from being downloaded (where your email client supports this functionality).

Third-Party Analytics. We also use automated devices and applications, such as Google Analytics (<https://support.google.com/analytics/answer/6004245>) (to opt out, go here <https://tools.google.com/dlpage/gaoptout>) to collect certain analytical information that helps us evaluate usage of our Sites. We use these tools to obtain aggregated statistical information about the use of our Sites to help us improve our services, performance and user experiences. These analytics providers may use cookies and other technologies to perform their services, and may combine the information that they collect about you on our Sites with other information that they have collected about you from your use of other websites. When a third party is used to collect such analytical information, you may want to consider how it uses such analytical information by reviewing its privacy policies and practices.

Third Party Websites. Our Sites may contain links to, or be accessible from, websites provided by third parties. Your use of a third party website is subject to such website's terms of use and other provisions, and you are responsible for complying with such terms and other provisions. This Privacy Policy does not cover the privacy policies or practices of any third party site, and Shift is not responsible for any information you submit to, or that is otherwise collected by, any third party site.

How We Disclose Your Personal Information

We will not disclose any personal information we collect from you to any third parties except as follows:

- (a) **Our Affiliates.** We may disclose your personal information to any of our affiliates within the Shift corporate group to the extent that these affiliates require such personal information and only employees or service providers of these affiliates which require such personal information to perform their duties will have access to it.

- (b) **Service Providers and Collection Agencies.** We may disclose your personal information to our service providers who perform certain services necessary to run our business (for example, data hosting) to the extent that they require such personal information to perform their duties.

- (c) **When Reasonably Required.** We may disclose your personal information when we believe in good faith that disclosure is necessary to protect our rights or property, protect your safety or the safety of others, investigate fraud or respond to a government, judicial or other legal request, or to comply with the law.
- (d) **Corporate Circumstances.** We may disclose your personal information in connection with a corporate change or dissolution, including for example a merger, acquisition, reorganization, consolidation, bankruptcy, liquidation, sale of assets or wind down of business.

Protecting Your Personal Information

At Shift we take the protection of your personal information seriously. We use commercially reasonable efforts to prevent unauthorized use, disclosure, loss or theft of your personal information. Employees who have access to your personal information are made aware of the importance of keeping it confidential.

Where we use service providers who might have access to your personal information, we select them carefully and require them to have privacy and security standards that are comparable to ours. We use contracts and other measures with our service providers to ensure that they maintain the confidentiality and security of your personal information and to prevent such information from being used for any other purpose.

Please be aware that no data security measures can guarantee complete security. You should also take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess and keeping your log-in and password private. If you do not want Shift to know any particular information about you, you should not include that information in anything you submit or post to the Sites.

Data Transfers

Some of our service providers may be located outside of your jurisdiction of residence. As a result, your personal information may be used, stored and/or accessed in countries outside of your jurisdiction of residence, including the United States. However, all such information will be protected in accordance with this Privacy Policy. Please note that when your personal information is located outside of your jurisdiction of residence it will be subject to the laws of the country in which it is situated.

Retaining Your Personal Information

We will only retain your personal information as long as is reasonably necessary for the fulfillment of the purposes for which it was collected or as reasonably necessary to comply with law. Your personal information is securely stored until such time as it is no longer required, after which it is destroyed or rendered such that it is unable to identify you.

Your Choices

You have the right to access and update your information and may do so by contacting our Privacy Officer (please see the “How to Contact Us” section below).³

Children

Our Sites are not intended for children under 13 years of age. However, if a parent or guardian of a child who is under 13 years of age discovers that personal information of a child has been submitted to Shift through one of our Sites without the parent’s or guardian’s consent, Shift will use commercially reasonable efforts to remove such personal information from our Sites and from Shift’s servers. To request the removal of personal information of a child under 13 years of age, the parent or guardian must contact Shift as set forth in the section below titled “How to Contact Us.”

Updates to this Privacy Policy

This Privacy Policy and our other privacy related documents are updated from time to time. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes to this Privacy Policy. This Privacy Policy may be found on our Sites or obtained by contacting our Privacy Officer (please see the “How to Contact Us” section below). Any such revised Privacy Policy shall take effect immediately upon its posting to the Sites, and will apply to all information collected by Shift following such posting.

How to Contact Us

If you have any questions related to our practices with respect to the collection, use or disclosure of your personal information, or if you wish to complain to us in writing about how we have handled your personal information, please feel free to contact our Privacy Officer us at:

Mail : [PO Box 66031 Town Centre, Pickering, ON L1V 6P7](#)
Attn: [Brittany Hammermeister](#)
Email: brittany@shiftmarketingstudio.com
