



Social Distancer Technologies Inc. (hereinafter referred to as “SDT”) develops and sells products assisting with social distancing monitoring. Your privacy is important to us so we’ve developed a privacy policy that covers how we collect, use, disclose share and store your personal information.

We are committed to preserving and respecting your rights to privacy. When you access our website, we may collect information from you pursuant to the terms of this Privacy Policy, and we will do our utmost to protect such information. **By accessing our website and/or using the SDT products, you consent to the collection and the use of your information by SDT, but only to the extent described in this Privacy Policy. Should you wish to revoke your consent, you may do so at any time in accordance with the terms set out below.**

This Privacy Policy (**together with our Terms and Conditions of Sale and Use**) sets out the basis on which we will deal with the personal information we collect from you, or that you provide us. Please read the following Privacy Policy carefully to understand our vision and practices regarding your personal information, how we use it and how we protect it.

1. What Data We Collect: We may collect information to facilitate the use of our products, service and website by you, our customer. We collect two types of information:
  - (a) Information of a personal nature (“Personal Information”) as required to verify your identity, create an account and/or activate our products and services. The Personal Information may include your name, email address, password, credit card information (through our credit card processor), date of birth, gender, height, weight and phone number. The purposes for the collection are:
    - (i) To allow you to purchase our services;
    - (ii) To communicate with you regarding our services;
    - (iii) To ensure that use of our services is efficient and effective;
    - (iv) To allow you to participate in interactive features that we offer, when you choose to do so;
    - (v) To facilitate your purchase with third party affiliates, if necessary;
    - (vi) To respond to your inquiries. Customer service is an important goal for us, and as such, we encourage you to submit questions or comments; and
    - (vii) To update you on changes to our services or products, including without limitation new services, promotions and changes to our terms.

We expressly acknowledge that we will only collect Personal Information to the extent necessary and as set out in this policy. The Personal Information we collect will vary depending on how you are using our products, services and/or the website.

- (b) Collection and Use of non-personal information (hereinafter referred to as “Non-Personal Information”): We also collect data in a form that does not, on its own, permit direct association with any specific individual. For example, to browse some portions of our website, you do not need to supply us with personal information that would allow others to identify you. It may also be possible to use our products where we don’t collect personal information, but still collect the unique device identifier, location and/or time zone where the product is used. Some of the information will be automatically collected and certain non-personal statistical information will be gathered. This Non-Personal Information will be collected without your knowledge or consent. Such collection will not allow you to be personally identified.

For example, one of the tools that we use are “cookies”. Cookies are record keeping files that are stored when you access a website. No personal information is contained on the

cookie. Instead, cookies contain statistical information such as where there has been movement, how the movement occurred, when and how many times. This information allows us to better understand user behaviour. Such cookies are merely one example of the various tools we will use to collect Non-Personal Information.

Cookies can also be personal. We may use cookies and other technologies to remember personal information when you use our products and applications. Our goal in these cases is to make your experience more convenient and personal.

- (c) **Other Statistical Information:** You acknowledge that SDT may gather other statistical information from feedback you voluntarily provide, in a manner which will not allow you to be personally identified, periodically to: (a) facilitate the provision of software updates, improve services, support, and other services to you, and/or (b) run statistics on trends.
  - (d) **Statistical Information Shared Outside of SDT:** Any statistical data that is shared outside of SDT will not enable third parties to identify clients.
2. **Device Information:** Your device collects data to estimate a variety of metrics. The data collected varies depending on which device you use and how you use the device. When your device syncs with our applications or software, data recorded on your device is transferred from your device to our servers. When you use our products, we also receive certain usage or network activity information. This includes information about your proximity with other SDT products and other similar location-based information. All of these uses of information enable us to provide you with the service features of the products.
  3. **Geolocation and Usage Information:** SDT products include features that use geolocation data that may include Wi-Fi access points and other devices to grant us access to your location. This allows the administrator of your device to derive your approximate location. The information we retrieve also allows us to improve the features of the product and troubleshoot and protect against possible errors.
  4. **How Long We Keep Your Data:** Data that we acquire will be retained as long as it is required in relation to that purpose, unless you otherwise withdraw your consent. Data that is not acquired in relation to a specific purpose will be regularly reviewed and amended where needed or deleted when it is no longer relevant or of use.
  5. **Servers:** The data we collect may be transferred to and stored at a destination inside or outside of Canada. It may also be processed by staff located inside or outside of Canada or by the staff of one of our service providers, advertisers, or other affiliates. Such staff may be engaged in, among other things, the processing of your payment details, providing customer services, after sales services, etc... By providing your information, you consent to this transfer, storing and/or processing. We will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
  6. **Security:** Unfortunately, the transmission of information via the internet is not completely secure. While we use commercially reasonable means to protect your personal information, we cannot guarantee the security of the data transmitted to our website and any transmission is at your own risk.
  7. **Withdrawal of Consent:** We will not collect any Personal Information from you without your knowledge and consent. You may withdraw your consent at any time by sending a written request to SDT. Upon receiving notice that you have revoked your consent, we will stop using your Personal Information within a reasonable time, which will vary depending on what information we have collected and for what purpose. Please note that we will send you a confirmation email upon receipt of your request. Therefore, if you do not receive

such confirmation email, please contact us again with your request. If this is required to continue using the product, your withdrawal of consent may cause your device to cease operating or functioning properly.

8. Sharing of Information: We will not sell, rent or disclose to outside parties the collected information except as described herein. Notwithstanding the foregoing, we may share the collected information with other parties as follows:
  - (a) Affiliated Service Providers: We may have agreements with various affiliated service providers to facilitate the functioning of this website, with whom we may share the information we have collected. For example, we may share your credit card information with the credit card service provider to process your purchase. All administrative service providers that we use are required to have the same level of privacy protection as we have, and therefore we expect that your information will be handled with the same level of care that we employ.
  - (b) Where required by law: We may disclose the collected information if there is a duty to disclose where required by law, specifically in response to a demand from government authorities where such demand meets the legal requirements. We may also disclose information about you to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of the services or the physical safety of any person.
  - (c) Statistical Analysis: We may share non-personal information that is aggregated or de-identified so that it cannot reasonably be used to identify an individual. We may disclose such information publicly and to third parties, for example, in public reports about social distancing, to partners under agreement with us, or as part of the community benchmarking information we provide to others.
  - (d) Sale of SDT: SDT may transfer any information in its possession in connection with a sale of assets of the company, a sale of the company or a merger.
  
8. Protection of Your Information: We are responsible for the protection of the information that we collect from you. Therefore, when we collect or use your information, we utilize security tools to ensure its protection. For example, your Personal Information will be password protected, and we will use firewalls to deter access to your information by outside parties. It should be noted that no security procedure is currently 100% effective. Should any breach of your personal information occur, we will inform you as soon as reasonably possible.
  
9. Right to Examine Information: You have the right to access your Personal Information that we collect. To request a copy of your Personal Information, please send us a written request to and we will respond within a reasonable delay. If any Personal Information we hold is incorrect, you can request to have it corrected. You may also:
  - (a) ask us to delete your Personal Information;
  - (b) ask us to remove you from our list of contacts for newsletters and other communications; and
  - (c) object to our use of your Personal Information even where we rely on our legitimate interests to do so, by withdrawing your consent and asking us to delete your Personal Information at any time. However, this may affect your ability to use the product.
  
10. Age of Majority: Access to the website and our product is restricted to persons aged 18 and over. If you are under 18 years of age, please do not purchase or use our products.

11. Modification to the Privacy Policy: Our Privacy Policy will remain in effect except with respect to any changes in its provisions in the future. This Privacy Policy will be updated from time to time, and such updates will be posted on this website, therefore, please periodically revisit this website to review the updates. Your continued use of any product, website or portal after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If you have any questions or concerns about SDT's Privacy Policy or data processing, you may contact our Data Protection Officer, or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. You can always contact us by phone at the relevant number for your country or region.

Please note that the last update was performed on April 22, 2020.