



## CHARLI AI Inc. PRIVACY POLICY

CharliAI Inc. and its affiliates, including any parent or subsidiary companies, or any other companies under common control of or with the Company (collectively, "CharliAI", "we", "us", "our") respect and uphold individual rights to privacy and the protection of personal information while balancing such rights with our need to process your personal information to manage our business and deliver our services to you.

Based on applicable privacy and data protection principles, we have developed this privacy policy (the "Policy") to explain our practices for processing your personal information. Personal information is any information that directly or indirectly identifies you. It does not include information that is publicly available, as defined by applicable laws. For more details on the types of personal information that we collect, please see below.

This Policy describes our practices with respect to how we may collect, use, disclose, retain, dispose and otherwise process (collectively, "process") and how you may correct, update and access your personal information that you provide as a user of (a) our personal assistant application known as "Charli" (the "Software") (b) the website operated at [www.charli.ai] (the "Website"), and (c) the services we provide through the Software and the Website (collectively, the "Service").

This Policy references and forms an essential part of the Tester Agreement between you and CharliAI (the "Tester Agreement"). All capitalized terms not otherwise defined herein have the meaning provided in the Tester Agreement. Our Website and Software may contain links or direct you to other websites, software, service providers or Internet resources (the "Other Providers") which are provided solely for your convenience, benefit and information. When you click on such links, you are contacting another website, software, service provider or Internet resource. We are not responsible nor liable for, nor have control over those Other Providers or how they process your personal information. We encourage you to read the privacy policies of such Other Providers to learn how they process your personal information.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. By using our Website, Software, or Service, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to the processing of your personal information in Canada in accordance with this Policy and as may be further identified when the personal information is collected. If you are located outside of Canada, please be aware that our Service is intended for and directed to users in Canada, and the privacy laws and principles in Canada may differ and not offer the same level of protection as those in your jurisdiction. Through your continued use of our Service you are transferring your personal



information to Canada and you expressly consent to that transfer and we will use this consent as the legal basis for such data transfer, unless otherwise stated in this Policy.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any of the Website, Software or Services or otherwise provide any personal information to us.

## 1. Personal Information

For the purposes of this Policy, "personal information" means any identifiable information about an individual, including but not limited to an individual's name, home address, telephone number, social insurance number, gender, income and family status, except any other information otherwise exempted by the applicable laws of British Columbia. For example, in British Columbia, personal information does not include any business contact information that is processed solely to communicate with that person about their employment or profession.

Due to the nature of the Service, the personal information we collect depends on how you use the Service.

Commonly, in the course of your use of the Service, we may collect the following personal information from you:

- i. Demographic information such as location of residence (city/province/country);
- ii. Contact information such as name, email address, mailing address, and phone number;
- iii. Billing information such as credit card number and billing address;
- iv. Unique identifiers such as username, account number, and password;
- v. Professional information such as occupation and location of occupation;
- vi. Your personal information may be collected when:
  - a. you register for an account with us;
  - b. you connect with us through social media;
  - c. we collect cookies and other tracking information through your use of Website;
  - d. we collect data from third parties or publicly available sources;

We only collect personal information that we need to provide the Service. We encourage you to not provide us with any personal information beyond what is necessary and as requested by us.

### Collection from Third Parties

We do not knowingly collect your personal information from any third parties unless you consent or we are otherwise exempted, required or permitted by applicable laws to do so. For example, we may collect your personal information from the following third parties:



- Your authorized representative(s);
- Organization(s) that you previously consented to collect your personal information; or
- Public sources in which your personal information is publicly available.

If we collect your personal information from a third party, we will only process that information for the specific purpose for which it was provided to us in accordance with this Policy and the policy under which that information was collected.

### **Cookies and Log Files**

To ensure the Service is optimized for your use and for future communications between you and us, we may save your user data in the form of cookies or log files and use such cookies or log files to collect standard Internet log information about how and when you use our Service. This information may include, but not be limited to, your IP address and location data, weblogs, time zone, date, your language preferences, browsers used, web addresses visited, other communication data, searches conducted, pages visited. You can manage your cookie preferences, but please note that if you refuse to allow cookies, you may not be able to use certain features of our Service.

### **Information about Minors**

This site is intended solely for users who are 13 years of age or older. We do not knowingly collect personal information about any minor, unless such personal information is provided to us with the consent of the minor's parent(s) or guardian(s). Otherwise, under no circumstances should a minor or his or her parent or guardian submit a minor's personal information to us through the Website, Software, Service or otherwise for any reason.

## **2. Purpose for Which Personal Information is Processed**

We may process your personal information for the following purposes (the "Purposes"):

- To verify and authenticate your identity;
- To connect with us through social media;
- To ensure that the Website, Software or Service is optimized for your use and benefit;
- To operate, maintain and provide to you the Services, features and functionality of the Website or Software;
- To communicate with you to provide you services, contacts, materials and/or recommendations for your needs as identified by you through phone, email, or the Website;
- To carry out our obligations arising from any contracts entered into between you and us;
- To comply with internal policies and procedures and other legal, accounting, or security requirements; or
- To share your personal information with our employees, contractors, consultants and other third party service providers such as web hosting providers, advertising agencies, payment processors or customer service



agencies (“Third Party Processors”) who require this information to assist us with establishing, maintaining and managing our relationship with you and optimizing and providing the Website, Software or Service for your use and benefit.

We will only process your personal information for the Purpose(s) for which we intend to process such information. Otherwise, we will not process your personal information without your consent.

### **3. Disclosure of Your Personal Information**

We may disclose your personal information for the Purposes as described in this Policy in the following ways:

- To our employees and contractors;
- To our business partners;
- To our service providers including web hosting providers, advertising agencies, payment processors and customer service agencies; and
- As required by law, to law enforcement, government or regulatory bodies, or other lawful authorities.

Your personal information that we collect may be processed in the United States or elsewhere outside of Canada. As a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with the USA PATRIOT Act, the USA Freedom Act and other applicable laws of the United States or elsewhere.

### **4. Legal Basis for Processing Your Personal Information**

#### **Consent**

We will process your personal information only with your knowledge and consent, except where exempted, required or permitted by applicable laws. The form of consent may vary depending on the circumstances and the type of information being requested. Your consent may be express with clear options to say “yes” or “no”, such as by being asked to check a box to indicate your consent, or implied, such as when you provide us with your address through a form or email seeking information and we use those means to respond to your request. Your consent can also be provided by an authorized representative. Taking into account the sensitivity of your personal information, purposes of collection, and your reasonable expectations, we will obtain the form of consent that is appropriate to the personal information being processed. By using our Website, Software, or Service, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to the processing of your personal information in accordance with this Policy and as may be further identified when the personal information is collected. When we



process your personal information for a new purpose, we will document that new purpose and ask for your consent again.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any of the Website, Software or Services or otherwise provide any personal information to us.

You may refuse to provide consent or may notify us at any time that you wish to withdraw or change your consent to the processing of your personal information without penalty, subject to legal or contractual restrictions and reasonable notice by (i) changing your privacy preferences through the Website or Software, (ii) deleting your account with the Website or Software and stopping use of the Website or Software, or (iii) opting out of the use of your personal information such as unsubscribing to any newsletter or mailing list subscription that we provide through the Website or Software. However, if you withdraw or change your consent, we may not be able to provide you with the Service.

#### **Other Legal Bases**

Aside from consent, we may also process your personal information under other legal bases, as permitted by applicable law.

#### **5. Security of Personal Information**

The security of your personal information is important to us. We follow and employ generally accepted industry standards as appropriate to the sensitivity of your personal information that you submit, both during transmission and once we receive it. We take physical, administrative, contractual and technological safeguards to protect personal information and insist that our service providers do the same. We insist that our personnel and those of our providers only access and use personal information on a “need to know” basis to properly perform those duties, and even then only to the strict extent necessary to perform them.

In addition, we ensure that any third party with whom we share user data - such as analytics tools, advertising networks and third-party SDKs, as well as any parent, subsidiary or other related entities that will have access to user data — will provide the same or equal protection of user data as stated in our privacy policy.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure. As such, despite our safeguards and protocols, we cannot fully guarantee the security of your personal information and you should always exercise caution when disclosing personal information over the Internet.

#### **6. Requests for Access to and Correction of Personal Information**

Applicable privacy laws allow, to varying degrees, individuals the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control. Our Privacy Officer will assist you with such an access request. This includes:



- your personal information under our custody or control;
- how your personal information under our control may be or has been used by us; and
- names of any individuals and organizations to which your personal information has been disclosed.

We will respond to requests within the time allowed by applicable privacy laws and will make every effort to respond as accurately and completely as possible. Any corrections made to personal information will be promptly sent to any organization it was disclosed to.

In certain exceptional circumstances, we may not be able to provide access to certain personal information we hold about an individual. If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

## 7. CASL Policy

We are committed to compliance with Canada's Anti-Spam Legislation ("CASL"). Any electronic communication we send to outside parties is protected by a range of business procedures, processes and policies to ensure that such communication is done in compliance with CASL. In our electronic communications with outside parties, we comply with the rules established by CASL and enforced by various Canadian authorities including the Canadian Radio-television and Telecommunications Commission. CASL regulates, and our policies generally apply to, each commercial electronic message we send (a "CEM") we send. A CEM is an electronic message sent to an electronic address that, among its purposes, encourages participation in a commercial activity.

In addition to adopting this Policy, we undertook various initiatives out of transparency to ensure we comply with CASL, which include:

- **Consent**— we do not send you CEMs without your consent. This consent typically must be "express" (expressly acknowledged by you), but in certain circumstances can be "implied". We created our sign-up, registration and consent forms in order to ensure that your consent is meaningful (i.e. informed and freely given) in accordance with CASL. When we collect your electronic contact information, you will know the exact purposes behind the collection.
- **Content**— we adopted processes to ensure that our CEMs contain the following content prescribed under CASL, which will usually be in the footer of the CEM. We will:
  - o identify ourselves as the party sending the CEM, and whether we are sending the message on our own behalf or on behalf of someone else;
  - o provide you with our contact information; and
  - o set out a clear, working unsubscribe mechanism or preference centre that is easy to use, automatic, and at no cost to you (other than your own cost of connecting to the Internet).



- **Clarity**— we ensured that each aspect of a CEM, including its header, content, or any links or URLs in the CEM) conveys the appropriate information, whether viewed individually or taken as a whole, so that you always know what you are clicking on.

If you receive a CEM from us but believe that you should not have or no longer wish to receive CEMs, we will aim to respect your preferences in a timely manner once you update them through our unsubscribe mechanism. CASL requires us to process unsubscribe requests within 10 business days. If you have any questions or concerns about our unsubscribe options, you may contact us at the address indicated below.

#### **8. Retention of Your Personal Information**

We keep your information only for as long as we need it for legitimate business purposes and compliance with legal requirements. We ensure that our retention standards meet these parameters by either anonymizing, destroying or erasing your personal information once we no longer need your personal information, or once the required retention period passes. If we do not destroy or erase your information, we will remove any personally identifiable information so that it becomes anonymous.

#### **9. Updates or Changes to Privacy Policy**

We may update this Policy to reflect changes to our information practices from time to time. If we make any material changes we will either (a) notify you by email (sent to the e-mail address listed in your account), or (b) provide a notice on the Website or otherwise through the Service before the change becomes effective. Any change to this Policy will apply to existing information, as well as information collected onwards from the date that the privacy policy is posted or on the date as specified in the notification.

You will find the date of the latest update at the end of this Policy. We encourage you to periodically review this page for the latest information on our privacy practices to ensure you are aware of any changes. Your continued use of the Service signifies your acceptance of any changes to this Policy.

#### **10. Contact Information for Privacy Officer**

You can direct any questions or concerns regarding our compliance with this Policy and our processing of your personal information to our Privacy Officer by emailing [marketing@charli.ai].

If you are not satisfied with our Privacy Officer's response to your question or concern, you may be able to file a complaint under applicable privacy laws. Our Privacy Officer will provide you with the contact information to do so if requested. We strive to offer an accessible and simple complaint procedure. We will promptly investigate all complaints received, and if a complaint is justified, we will take the necessary steps to resolve the issue in question.



#### 11. Changes to Privacy Policy

Privacy laws continue to evolve and, as a result, we may change this Policy from time to time at our full discretion without any prior notice or liability to you or any other person. The processing of your personal information by us will be governed by the version of this Policy in effect at that time.

End of Privacy Policy (Last Updated: [02/14/2020]).