

# PRIVACY POLICY

Last updated: 2019-06-28

This policy (the “**Policy**”) describes how 9374-3078 Québec Inc. (“**MySmartJourney**,” “**we**”) collects, processes, uses and shares personal information and data about users of the MySmartJourney application (the “**Application**”).

As used in this Policy, the term “personal data” refers to information that concerns an identifiable individual.

## Data controller

Contact information for the data controller (person responsible for processing the personal data) for the purposes of this Policy is as follows:

**9374-3078 Québec Inc.**  
3614 Saint-Urbain Street  
Local 220  
Montréal (Québec) H2X2P3

Attention: Privacy Officer  
Email: [privacy@mysmartjourney.co](mailto:privacy@mysmartjourney.co).

## Basis for data processing

In order to allow you to use the Application and its related functions, we may have to collect and process personal information about you. The processing of personal data by MySmartJourney is essentially based on the following principles:

- We must process certain personal data so that we can provide you with access to the Application.
- We may process certain personal data based on your acceptance of our terms of use or because you have given your specific consent to the processing of this data.
- You may withdraw your consent at any time, in which case we will cease processing your personal data based on your consent.

## **Collection of information**

### **Information that you provide to us**

We collect information provided by you or with your agreement when you use the Application or otherwise. This information may include, as the case may be:

- Your first and last name, email address and phone number;
- Information you share by responding to certain forms integrated into the Application by MySmartJourney or one of its clients;
- Content you upload to the Application—for example, if you write a comment about a product offered by a MySmartJourney client, or if you upload a photo or video to the Application.

### **Information collected automatically**

We collect certain information automatically when you use the Application. This information is saved each time you interact with the Application. Data collected automatically includes certain information specific to your mobile device as well as data concerning your interaction with the Application, including:

- Your mobile device's operating system and identification number;
- Your mobile device's brand and model;
- The version of the Application you are using;
- Your mobile device's language;
- The IP address used by your mobile device to access the Application;
- The country, state, city and postal code where your mobile device is located;
- Screens viewed, actions taken, and the number and dates of Application sign ins.

### **Location data**

We collect data about your specific geographic location when your device's geolocation function is activated and you have authorized the Application to access it. By enabling the Application to access your mobile device's geolocation functions, you consent to our collection and use of location data in accordance with the Policy. You may use the Application even if you have not granted access to your location data or your mobile device's geolocation functions are deactivated, but certain features will be disabled.

Data about your geographic position is recorded each time you use the Application. This data may enable other data about you to be deduced, such as points of interest that you visited.

### **Data from analysis tools**

When you access the Application, we collect certain data provided by analysis tools such as Google Analytics. This data may include, for example, sex, age, interests. This data is not associated with you personally and is provided to us in aggregate form.

### **Data from social networks**

We collect data sent by social networking sites or applications (Facebook, LinkedIn, Twitter, YouTube, Google+, etc.) when you sign into them through the Application.

We also collect information sent by these social networking sites or applications when you interact with profiles we have on these social networking sites or applications. These sites or applications are governed by their own policies regarding your personal data, which may be different from ours, and may be applicable.

## **How is your data used?**

We use personal data collected through the Application for the purposes described below.

### **To contact you**

We use the personal data you provided to us (such as your name, your mobile phone number and your email address) to communicate with you by email or SMS regarding your use of the Application, but only if you have provided this information and you have agreed to receive communications from us. We comply with applicable regulations on unwanted electronic communications. If you no longer wish to receive electronic communications from us, you may inform us at any time by writing to us at the following address: [privacy@mysmartjourney.co](mailto:privacy@mysmartjourney.co).

In the event that the Application uses push notifications and you agree to receive them, we will use certain personal data to determine when to send you a push notification and the contents of this notification. For example, you may receive a notification because you are approaching the location of a MySmartJourney token. You may withdraw your consent to this processing of your personal data by disabling push notifications for the Application.

### **Use by MySmartJourney**

It is possible that MySmartJourney uses personal data collected through the Application to create nominative lists and to target users' areas of interest and general profiles.

### **Provision of information to our partners**

We may provide the following information to companies that use the Application and that have created content on the Application page with which you are interacting (the "**Partner**"): your contact information (which may include your name and email address), as well as information on these interactions and on your general use of the Application, which may include information such as the number of visits.

It is also possible that data provided to Partners may be shared with third parties in the same corporate group as these Partners.

We use data collected through the Application in aggregate form—that does not allow data to be associated with a specific individual or mobile device—to provide information to our business Partners. We share Application usage statistics with our Partners—which are segmented

according to certain personal characteristics—without associating these characteristics with any specific individual.

### **Application maintenance**

We use data collected through the Application and data from analysis tools for general monitoring of the use of the Application by users, to prevent abusive use of the Application, to identify problems or bugs in the Application and to determine functions that require improvement.

### **How is your data stored?**

We store collected personal data until you ask us to destroy it or until our activities no longer require us to keep it. We do not undertake to store collected personal data for a specific period.

Collected personal data is stored electronically on servers operated by our service providers. These servers are located in various jurisdictions in North America.

Collected personal data on individuals located outside North America is transferred to North America.

### **How is your personal data protected?**

Your personal data is stored by our service providers who have given us a commitment to take reasonable security measures to preserve the integrity and confidentiality of data.

Our employees and suppliers have been informed of the confidential nature of the collected personal data and have been made aware of appropriate security measures to prevent unauthorized access to personal data.

### **To whom is your data disclosed?**

We do not share your personal data except as described in the Policy or when we have obtained your consent. Your personal data may be disclosed to the categories or people described below for the purposes mentioned.

#### **Employees**

Collected personal data is only accessible to our officers and employees who must access it for the purposes set out in the Policy.

#### **Service providers**

We disclose certain personal data to service providers (such as marketing consultants and IT suppliers) so that we can serve our clients more efficiently. We do not sell our visitors' personal data and do not allow our service providers to use this data on an individual basis. These providers

agree in writing to preserve the confidentiality of data and to refrain from using it for anything other than to provide services to us.

### **Our partner/Client**

We may disclose certain personal data to our partner/client that has required us to provide them with this Application for its use by you. In such case, the trademark, name or logo of such partner/client will be visible and displayed in the Application.

### **Legal obligations**

We may disclose collected personal data to third parties if expressly authorized or required by law, or if we are required to do so by a competent authority. We may disclose personal data as part of legal proceedings if necessary to protect our rights or those of our users.

### **Business transfer**

In the event that the sale or restructuring of all or part of our business is contemplated, we may disclose collected personal data to persons or organizations involved before and after the transaction, whether or not the transaction is carried out. In such a case, these persons or organizations will have undertaken to preserve the confidentiality of collected personal data and to use it solely to assess the feasibility or advisability of the proposed transaction as well as in compliance with the Policy.

### **Sharing content**

The Application includes functions that allow you to share certain content through social media platforms such as Facebook. If you share content that includes personal data, that information may become available to the public based on the share settings you selected.

### **Your rights concerning personal data**

#### **Access to your data**

You may access certain personal data that you provided to us personally by accessing your account through the Application.

You may request access to certain personal data we have on you or request modifications to inaccurate data by writing to us at: [privacy@mysmartjourney.co](mailto:privacy@mysmartjourney.co) or to the address of the data controller indicated at the beginning of this Policy.

We will process your request promptly (within 30 days of receipt), by allowing you to access your own personal data contained in our files. When required by law, we will provide your data in a machine-readable format.

#### **Withdrawal of consent**

You may withdraw your consent to the collection of certain data—such as location data, by restricting the Application’s access to your mobile device’s location data.

The Application allows you to withdraw your consent for certain processing of your personal data—for example, by opting in or out of receiving promotional offers or the right to use your image, based on your activities when using the Application.

If you wish to withdraw your consent to the processing of your personal data beyond what is allowed by the Application or your mobile device, please inform us in writing at [privacy@mysmartjourney.co](mailto:privacy@mysmartjourney.co). It is not possible to prevent all use of your personal data while continuing to use the Application. The only way to stop all processing of your personal data is to stop using the Application.

### **Deletion**

In certain circumstances, you may request the deletion of the personal data we hold about you. To request a deletion, please write to us at [privacy@mysmartjourney.co](mailto:privacy@mysmartjourney.co). We will process your request as soon as possible (within 30 days of receipt).

If you continue using or resume using the Application, we will continue to collect certain information about you again.

### **Complaint**

If you reside in the European Union, you have the right to file a complaint concerning the handling of your personal data with an authority responsible for the application of privacy legislation. This authority varies according to your country of residence.

If you reside outside the European Union, this Policy shall be governed by applicable Canadian laws and regulations and Canadian authorities shall have exclusive jurisdiction to receive any complaint or claim concerning this Policy or concerning the processing of your personal data by MySmartJourney.

A link is available at the bottom of the page being viewed whenever you use the Application; this link enables you to contact MySmartJourney to file a complaint.

### **Verification**

We reserve the right to verify the identity of individuals requesting access to personal data. Any information collected to perform this verification will not be used for any other purpose.

## **Changes to this Policy**

We may update the Policy from time to time in order to reflect changes in our personal data management practices. In the event the Policy is modified, the new policy will be available at the following address: [mysmartjourney.co/privacy](https://mysmartjourney.co/privacy).

We will inform the individuals who have provided us with their email address of the change to this Policy before the modified Policy comes into force.

## **Additional information**

For any additional information about our handling of your personal data, you may contact us at the address indicated at the beginning of this Policy.