

## **PRIVACY POLICY**

This Privacy Policy governs the collection of information by CHOICE DIGITAL LP, with its registered address in Canada ("the Company", "We", "Our", "Us"), from individuals who utilize our website <https://choicedigitalp.com/> ("Website") and the services provided therein ("Services"), or from those individuals whom we contact via email or other communication methods. For the purposes of this document, "User", "You", and "Your" refer to the visitors and users of our Website and/or Services.

We acknowledge the significance of your privacy and the safeguarding of your Personal Information. Therefore, we provide this Privacy Policy to assist you in deciding whether to access or continue to use our Website.

For the purposes delineated in this Privacy Policy, "Personal Information" refers to data that:

- (a) is supplied by You to Us; and
- (b) serves to identify You personally, either directly or indirectly.

Personal Information encompasses details such as your name, email and physical addresses, as well as your billing, banking, and payment information, telephone number, and any other information that could be utilized to personally identify or contact You.

### **DATA COLLECTION**

This Privacy Policy is prepared in accordance with various data protection laws, ensuring compliance with the General Data Protection Regulation (GDPR) relating to the protection of natural persons with respect to the processing of personal data and the free movement of such data.

We only collect the minimum amount of information necessary for your use of the Website and our Services. We may collect, process, use and transfer your data as follows: (a) to comply with our Terms of Service; (b) with your explicit consent, which you may withdraw at any time; (c) to comply with our legal obligations; (d) to protect your vital interests or the vital interests of others; (e) as necessary in the public interest; and (f) to pursue our (or others') legitimate interests, including our interest in providing innovative, personalised, secure and beneficial services to you.

### **WHAT DATA MAY WE COLLECT AND HOW?**

In operating our Website, we may collect and process the following data from you and your organization to provide you with the use of our Website and Services:

- **Contact Information:** Information you provide directly to us by filling out contact forms on our Website to obtain information about our Services or explore cooperation opportunities. This information is submitted via browser or online forms and includes your first name, last name, email address, and phone number.
- **Registration Information:** If you apply for account registration, you will be asked to provide certain information such as your name or company legal name, address, phone number, business type, website address, date of incorporation, country of incorporation, and contact information.
- **Payment Information:** Information you provide to us, such as your credit card or debit card number or bank account number.
- **Form Information:** Information provided to us when you fill out forms on our Website, including inquiries, survey information, and/or site registrations.
- **Communication Information:** Information provided to us when you communicate with us for any reason.
- **Visit Details:** Information about your visits to our Website and the resources you access, including traffic data, location data, web logs, and other communication data, such as your IP address, the date and

time you accessed or left the Website, and the pages you viewed. Some parts of our Website may use cookies and other technologies to collect this information about your general internet usage.

#### ***ADDITIONAL INFORMATION***

Additionally, we may gather or receive the following information.

**From Your Activity:** To enhance the Website, we automatically collect certain data when you access and/or use it. This includes IP addresses, browser type and language, referring and exit pages and URLs, date and time, time spent on specific pages, the pages visited, return visits, and similar usage information.

**From Cookies:** Cookies are small data packets stored on your computer or mobile device by the Website to remember information about your visit. We may use session cookies (which expire when you close your web browser) and persistent cookies (which remain on your device until deleted). If you prefer not to have cookies stored on your hard drive, you can disable this feature on your computer or mobile device. Refer to your Internet browser's documentation for instructions on disabling and deleting persistent cookies. Note that refusing cookies may cause certain features of the Website to function improperly.

**From Web Beacons:** A "Web Beacon" is an embedded object on a web page that allows website operators to verify if a user has viewed a particular page. Web Beacons are typically invisible to users. We may use Web Beacons to count users who have visited specific pages of the Website. While Web Beacons cannot be declined, they can be rendered ineffective by declining all cookies or by adjusting your browser settings to notify you each time a Web Beacon is presented, allowing you to accept or decline them individually.

**Third-Party Analytics:** We may employ third-party analytics services to assess your use of the Website, compile activity reports, and analyze performance metrics. These services collect data such as IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, date and time, time spent on specific pages, sections of the Website visited, number of links clicked, search terms, and other usage data. These third parties use cookies and other technologies to help analyze and provide us with this data. By accessing and using the Website, you consent, to the extent permitted by applicable law, to the processing of your data by these analytics providers as outlined in this Privacy Policy.

**Aggregate Data:** To better understand our users and improve the Website, we may analyze your information in aggregate form and combine it with other data for reporting, planning, development, operation, maintenance, management, and enhancement purposes. The aggregate information collected does not personally identify you; similarly, user-level information (e.g., IP Address or Device Identifier) can identify a user's device but not the user directly by name. We may share this aggregate data with our affiliates, agents, and business partners.

#### ***USERS MUST BE OF LEGAL AGE***

Our Website is intended for individuals who have reached the age of majority.

By using our Website, you confirm that you are at least 18 years old or the age of majority in a territory where the age of majority is older.

We are not responsible for any damages resulting from a user misrepresenting their age.

Individuals under the age of majority are not permitted to submit or post any information, including personal information, on our Website. Under no circumstances may individuals under the age of majority use our Website.

Parents or legal guardians of individuals under the age of majority cannot accept this Privacy Policy on their behalf.

#### ***WHAT ARE YOUR RIGHTS UNDER THE GDPR?***

If you reside in certain jurisdictions such as the European Economic Area (EEA) or the United Kingdom (UK), you have specific rights and protections under the law regarding the collection, processing, and use of information about you. These fundamental rights include:

(a) Right to be informed: You have the right to request confirmation of whether we process Personal Information relating to you.

(b) Right of access: If we process your Personal Information, you have the right to request a copy of that Personal Information.

(c) Right to rectification: You have the right to request that we rectify or update your Personal Information that is inaccurate, incomplete, or outdated.

(d) Right to erasure/to be forgotten: You have the right to request that we erase your Personal Information in certain circumstances provided by law.

(e) Right to restrict processing: You have the right to request that we restrict the processing of your Personal Information under certain conditions.

(f) Right to object to processing: You have the right to object to us processing your Personal Information under certain conditions.

(g) Right to data portability: You have the right to request that we transfer the Personal Information that we collected from you to third parties or directly to you under certain conditions.

You can choose not to provide your Personal Information to the Company by abstaining from engaging in the activities described above. If you decline to submit Personal Information, we may not be able to provide some or all of our Services to you. By providing Personal Information to the Company, you explicitly consent to the collection, processing, use, and disclosure of such Personal Information as specified in this Privacy Policy.

#### ***HOW WILL WE USE YOUR DATA?***

We process your information based on your explicit consent. If you do not provide this information, we may be unable to deliver the Services. We use Personal Information solely for the purposes and in the manner described in this Privacy Policy. Specifically, we may use your Personal Information to:

- a. Provide and maintain our Website and Services, and to process and fulfill your requests.
- b. Verify our users and ensure they are qualified and eligible to use our Services.
- c. Conduct business with you, including processing payments and communicating with you regarding your business activities related to the provision or acceptance of Services.
- d. Process, format, and display customized content on the Website for you.
- e. Conduct marketing activities, including sending you emails and text messages about products, events, promotions, and offers from the Company or our partners or advertisers, and evaluating the effectiveness of our marketing.
- f. Develop new products, services, features, and functionality, and analyze how you interact with our services.
- g. Measure performance and analyze key business metrics.
- h. Conduct research, analytical, and statistical purposes.

#### ***HOW LONG DO WE KEEP YOUR DATA?***

We process your Personal Information for as long as you are a user of our Website and/or Services, unless a longer retention period is required by law. We have established standard retention periods based on the type of information we hold. We regularly review data records to ensure compliance with these retention periods and assess the need for retention at appropriate intervals. Additionally, we delete information that is no longer necessary or if you choose to opt out. If you have any questions regarding the duration of data retention, please contact us.

## ***HOW DO WE USE YOUR DATA FOR MARKETING PURPOSES?***

We may send you information about our products and services that we believe may be of interest to you, as well as the products and services of our partner companies. This includes displaying targeted advertisements, invitations to our events or surveys, and other marketing communications. If you have agreed to receive marketing communications, you can opt out at any time. We do not share personal information (such as your name or email address) without your consent.

### ***UNSUBSCRIBE PROCEDURE***

We are committed to combating unsolicited marketing emails, or spam, as they harm the interests of Internet users. You can always unsubscribe from our mailing list by clicking on the unsubscribe link contained in the email or by writing to us at [info@choicedigitalp.com](mailto:info@choicedigitalp.com).

### ***DO WE UTILIZE COOKIES?***

We may employ cookies for various purposes, including to:

- (a) Ensure the proper functioning of our Website and Services;
- (b) Detect and prevent potentially harmful or illegal use of our Website and Services;
- (c) Safeguard your data from unauthorized access;
- (d) Gain insights into how you interact with our Website and Services; and
- (e) Analyze and enhance our Services and develop new ones.

You have the option to refuse the use of cookies by selecting the appropriate settings in your browser, but please note that doing so may result in some features of our Website or Services not working properly.

### ***THIRD-PARTY LINKS***

We may include links or automatically redirect you to third-party websites that operate independently of this Privacy Policy. For instance, clicking on a link on our Website may lead you to a website that we neither operate nor control. It is important that you review the privacy policies and terms of use of all third-party websites you visit. These third-party websites may independently request and gather information from you. Occasionally, these third-party websites may also provide us with information about your activities on their platforms. Please be aware that this Privacy Policy does not apply to the collection and usage of information by such third parties.

The linked third-party websites maintain separate and distinct privacy policies, notices, and terms of use, which we advise you to read attentively. We lack control over these websites, and thus, we bear no responsibility or liability for how the operators of these linked websites collect, use, disclose, secure, or otherwise handle your personal information.

### ***DO WE SHARE YOUR DATA WITH THIRD PARTIES?***

Your personal information is crucial to our business, and we have no interest in selling your data to others. We collaborate with third-party partners who assist us in providing our Services to you. We only share your data with these partners as described below and under contract terms that restrict their use of Personal Information. We share your Personal Information with trusted entities as follows:

#### ***(a) Service Providers***

We may share Personal Information with service providers that perform services on our behalf, such as identity verification services, website hosting, data analysis, marketing services, IT infrastructure, customer service, email delivery, and auditing services.

#### ***(b) Payment Providers***

We may share Personal Information with third-party payment providers in connection with our payment processing services to our users. Examples of third parties to whom we may disclose Personal Information for this purpose include banks and payment method providers (such as credit card networks).

### (c) Legal Disclosures

We may also share your information to comply with laws or respond to lawful requests and legal processes, to protect the rights, property, and personal safety of the Company and our employees, agents, customers, and others, to enforce or address violations of the Company's Terms of Services and/or Advertising Policy, and to investigate, prevent, or take action regarding illegal or suspected illegal activities. In such circumstances, your Personal Information may also be disclosed to our attorneys.

We do not share your Personal Information with third parties without your explicit consent. If we wish to use your Personal Information for any purpose other than those described in this Privacy Policy, we will seek your consent before doing so and provide you with an effective way to opt out of such use. If you choose to opt out or decline to provide Personal Information in response to such a request, we may be unable to offer you some or all of the Company's Services or certain features available on the Website.

The use of Personal Information by an authorized third party is governed by the third party's privacy policy.

### ***DO WE TRANSFER YOUR DATA TO THIRD COUNTRIES?***

Your information, including Personal Information, is processed at the Company's operating offices and in other locations where the parties involved in the processing are situated. This means that your information may be transferred to and maintained on computers located outside of your country, or other governmental jurisdiction, where data protection laws may differ from those in your jurisdiction.

By consenting to this Privacy Policy and submitting your information, you agree to this transfer.

The Company will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfer of your Personal Information will occur to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information.

### ***CHANGES TO OUR PRIVACY POLICY***

We may update this Privacy Policy periodically and will post any changes on the Website as they take effect. We review this Privacy Policy to ensure that we process your information in compliance with it. By accessing and/or using the Website after any changes are made, you are considered to have accepted those changes. We encourage you to review this Privacy Policy regularly to stay informed.

### ***CONTACT US***

If you have any questions, comments, complaints, or requests regarding this Privacy Policy, please do not hesitate to contact us at: [info@choicedigitalp.com](mailto:info@choicedigitalp.com).