

PRIVACY POLICY

1. Purpose

Noki Systems Inc ("Noki") values your privacy and is required to manage your personal information in accordance with the *Freedom of Information and Protection of Privacy Act* ("FIPPA"). The purpose of this Privacy Policy is to disclose (i) the information that we may collect; (ii) the way we may use that information; and (iii) how we may disclose that information to others.

This Privacy Policy is hereby incorporated into our Website Terms of Use Agreement. No language in any of these agreements pertaining to personal information is applicable if the language contravenes FIPPA. This Privacy Policy is also applicable to any information we may collect from you through our customer service centre or programs (whether that information is provided telephonically, electronically, or by mail).

This Privacy Policy may change from time to time, so please check periodically for updates.

1. Information Collection, Use and Disclosure

Information We Collect

Most of the information that we collect is the information that you give to us through services and activities under the Noki Agreements, customer service centres or programs, or otherwise (including, but not limited to, all personally identifiable information, "User Information"). We collect, receive, and may store User Information.

User Information that we may collect, receive, and store may include your full name, user name, phone number, email address, billing address, shipping address, credit card information (including the credit card number, expiration date, and the full name on the credit card), billing and event history, and jurisdiction, geographic and location information gained through the use of any of our mobile device applications, and postal code. We also may collect other supplemental information from various third parties. For example, if you incur a debt to Noki, we may conduct a credit check by obtaining additional information about you from a credit bureau, as permitted by law; or, if the information you provide cannot be verified, we may ask you to send us additional information, such as your driver license, credit card statement, or utility bill, to confirm your address, or we may ask you to answer additional questions on our website, via email, or through our customer service center or programs. You can always choose not to provide any User Information, but then you might not be able to take advantage of all of our services.

When you download, access and use our applications or website, information that does not identify you may be collected by Noki or our service providers to customize and improve user experience, improve our applications and services, understand usage and navigation trends in the aggregate, and determine the relevance of content, and for other planning and evaluation purposes. The information automatically collected is not linked to your personal information. In particular, we may collect:

- Website Details: Google Analytics or other analytics providers may also collect information about the parts of our application or website you use or third-party websites you visit when you leave our website;
- App Usage Details: When you access and use the application, we may automatically collect certain details of your access to and use of the app, including location data and other communication data and the resources that you access and use on or through the app; and
- Other information: we may collect information about your IP address, operating system, browser type, mobile network information. IP addresses also may be linked to User Information, to improve your experience while you are using our website.

Although we have no obligation to do so, we also may retain any email, letter, or other correspondence from you, to ensure quality control.

Information collected automatically may be done using cookies or mobile cookies, or related technologies. A cookie is a small file placed on your computer or smartphone. It may be possible to refuse to accept cookies or location-based capabilities on your browser or mobile device by activating the appropriate setting. However, if you select this setting you may be unable to access certain parts of our application or sites. You can choose whether to share personal information. If you choose not to share, some parts of our sites and some services may be more difficult or impossible to use.

In installing or operating our mobile payments app, the app or operating system may display default notices indicating that, or requesting that, access to photos, media, files or contact lists. Please note that neither Noki nor its service providers access any such information on your device. Noki does not have any method by which to access any files on your device except a local log file that documents your activity within our app only. This log file is stored on the same memory space as your photos and music, and the operating system therefore may require such notices to indicate that we have access to that general memory space. Additionally, this log does not track your activity in any other app, nor does it contain data pulled from any other function on your device. We can access the file only when you submit a bug report. The data in the log file allows us to reproduce, and ultimately fix, any bug that you encounter during your use of the app.

How We Use Collected Information

We may use any User Information provided by you to serve you and to operate and maintain our services and products. For example, we may use any User Information to respond to your requests, to customize your future use of our website or services, to improve our website and services, and to communicate with you. We do not use User Information that identifies you for any marketing purpose unless we have given you the choice to consent or withhold consent to such use at the time you provide your User Information, in which case we will honor your choice; but, we may use your User Information without your consent for non-marketing purposes.

When We May Disclose Information

We may use third party companies to provide us with back-end support for our services, including, but not limited to, our mobile payments service, data storage and processing, web hosting and credit card processing. We reserve the right to partner with any third party to provide those services, and we may share User Information to those third parties to allow them to provide those services. We also may exchange information with other companies and organizations for fraud protection and credit risk reduction. Some of our third-party service providers are based in the United States. Accordingly, some or all of Your User Information may be stored or processed in the United States and, while such information is in the United States, it may be accessed by U.S. courts, law enforcement and national security authorities.

For our mobile payments service, we have contracted with third party service providers to provide people with the ability to manage their needs from their mobile devices. The mobile payments application and transactions will be provided through servers in Canada and the United States. We have contractually required the appropriate security and protection measures that meet our legal requirements and requirements of this Privacy Policy, and User Information can only be processed for the purposes of providing services to Noki.

The mobile payment service is an additional method for collecting payment from people using system locations. The only additional disclosure of your personal information is to our service providers' staff for the purposes of managing the service.

We may also disclose User Information that we believe is necessary or appropriate: (i) to enforce our rights under the Noki Agreements, or any other agreements; (ii) to investigate or defend against any allegation or claim against Noki or involving our services; (iii) to assist governmental enforcement agencies or to respond to a subpoena in accordance with applicable law; and (iv) to protect the property rights and safety of anyone (e.g., if you are in an accident and are unable to communicate personal information to the appropriate authorities, we may provide User Information to the authorities). We also may release User Information if required to

do so by law or by agreement, or if in good faith it is necessary to comply with any law or agreement.

We may also share User Information, in our discretion, to the extent that such information is not readily personally identifiable, including, without limitation, with researchers or the public, such as data challenges or other public disclosures of data that is not readily identifiable.

1. Safeguarding Your Information

We take reasonable security precautions to protect User Information. When we ask users to enter sensitive information (such as a credit card number), that information is encrypted. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Your PIN protects your account information from unauthorized access and you are responsible for keeping this information confidential. We ask you not to share this information with anyone. We have required our providers to ensure that payment transactions are protected to Payment Card Industry Data Security Standards (PCI DSS).

If you have any question about the security on our website or about our services, you can send an email to support@nokisystems.com. Although we intend to use reasonable security safeguards to protect the security of User Information, WE HAVE LIMITED CONTROL AND WE CANNOT PROVIDE OR GUARANTEE COMPLETE SECURITY OF ANY USER INFORMATION, INCLUDING, BUT NOT LIMITED TO, ANY USER INFORMATION THAT IS PROVIDED TO THIRD PARTIES, THEREFORE, YOUR POSTING OR TRANSMITTING OF ANY USER INFORMATION IS DONE AT YOUR SOLE RISK. If there is a serious breach in the security of our services, then we will attempt to contact you using some or all of the User Information you have provided to us, to allow you to take further steps that may be necessary to protect your information. We will also take steps to promptly notify the appropriate governmental agencies.

1. Links to Other Sites

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of any other website. We encourage our users to be aware of when they leave our website and to read the privacy policy of every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by Noki.

1. International Use

Our services are provided in Canada and are intended solely for the use of users in Canada; however, if you use and access the Website or services from outside of

Canada, then be aware that Canadian laws apply to Noki, our website, and our services.

1. Policy Regarding Children

We do not knowingly collect or maintain any information from any person under 16 years of age, and no part of our services or our website is communicated directly to any person under 16 years of age, except through the person's parents or legal guardians. If we learn that User Information of any person under 16 years of age has been collected without parental or guardian consent, then we may take appropriate steps to delete that User Information. If you are under 16, you may use our website only with the involvement of a parent or guardian.

1. Updates and Changes to Privacy Policy

At any time and from time to time, we may unilaterally amend, modify, or change this Privacy Policy in our sole discretion. Notice that this Privacy Policy is amended, modified or changed by Noki may be given to You by either: (i) a posting of a notice on the Noki website; (ii) an e-mail to you; or (iii) by in-app notification. By continuing to use our website or any of our services after any amendment, modification, or change notice was provided, you have agreed to be bound by all such amendments, modifications, and changes. Therefore, please carefully check the Noki website and provided e-mail address on a regular basis to maintain awareness of all amendments, modifications, and changes to the Privacy Policy. If you choose to visit our website, your visit and any dispute over privacy is subject to this Privacy Policy and the Noki Agreements.

1. Contact Us

For more information or if you have questions or concerns regarding our Privacy Policy, please contact Noki Privacy Officer by e-mail at nokisystems.com.

Last Updated on June 15, 2023.