

TRELENT PRIVACY POLICY

TRELENT (“**Treleant**”, “**we**”, “**us**”, “**our**” and terms of similar meaning) take your privacy rights very seriously. We are committed to transparently describing our privacy practices, including how we collect, use and disclose (a) your personal or personally identifiable information (“**Information**”); and (b) data we obtain from your activity on the Services (as defined below) (“**Data**”) as part of providing the Treleant website (www.treleant.net) (the “**Site**”) and access to the virtual private and dedicated servers and scalable computing resources, which we call “Treleant PCs” (collectively, the “**Services**”).

We encourage you to read and understand our Terms and Conditions that apply to your particular use of the Service (each being referred to herein as an “**Agreement**”) and this privacy policy (“**Privacy Policy**”) before accessing and/or using the Service. By accepting the applicable Agreement(s) and/or Privacy Policy or accessing and/or using the Service, you expressly consent to our collection, use and disclosure of Information and Data in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to each Agreement.

All capitalized terms that are applicable to you that are not otherwise defined herein obtain their meaning from each Agreement.

1. What Information and Data Do We Collect?

- (a) *General.* Our primary purpose in collecting Information and Data from you voluntarily is to provide you with a safe, smooth, efficient, and customized experience when using the Service. We will only ask for and collect Information and Data that we consider necessary for achieving this purpose.
- (b) *Information Provided by Users.*
 - (i) You can browse the public facing sections of the Site without telling us who you are or revealing any Information. However, in order to use the Services, you must register for an Account and/or Login. When registering for an Account and/or Login, you must provide Information as requested or where indicated on the Site. At that time, you will no longer be anonymous to us. Where possible, we indicate which fields are required and which fields are optional. When using the Services, we may collect, without limitation, Information and Data including: your first and last name, email, address, phone number, other information inputted by you and Data generated from your use of the Services.
 - (ii) As you use the Services, you can, or may be required, from time to time enter or send to us Information, which may include, without limitation, Information and Data, including software, files, pages, works, and/or materials, uploaded, stored, transmitted, displayed or linked to, from, or through the Site by you in connection with the Services.
 - (iii) You always have the option to not provide Information by choosing not to use, access and/or become a user of the Services.
- (c) *Payment Method.* If you have registered for an Account, we may collect your credit card, other payment and/or banking information. If and when you add a credit card, payment method and/or banking information to an Account, such information and your Information may be shared with our third-party payment processor(s). We do not store credit card, other payment and/or banking information on our servers.
- (d) *Information and Data Collected Automatically*
 - i. When you use the Site and the Services, Treleant automatically receives and records Data from your device, including, without limitation, your location, IP address, browser type (if applicable), operating Data, device Data, device and Application IDs, “cookie” information, CPU usage, RAM usage, disk usage, the page you requested, frequency and pattern of your use of the Services. This usage data may be processed for the purposes of analyzing the use of the Services. Unless otherwise stated in this Privacy Policy, Treleant only uses this Data in aggregate form.

- ii. “Cookies” and similar technologies are small files placed on your computer and devices that assist us in providing the Service. We and our third party service providers use cookies and similar technologies to provide and personalize the Service, identifying you for authentication purposes, analyze use, target advertisements and prevent fraud. You can disable cookies in your browser settings, however, if you do so, some parts of the Service may not function properly.

2. How Do We Use Information and Data?

We may use Information to determine your eligibility to have an Account and/or be given a Login and be a user of the Services. We may also use your Information and Data to provide to you the license to use the Services, to provide you with access to and use of the Services; communicate with you, either directly or through one of our partners, including for marketing and promotional purposes; to improve our marketing and promotional efforts; to advise of pricing and Services related updates; facilitate transactions and payments; resolve service disputes; troubleshoot problems; inform you about online and offline offers, products, services, events and updates; to analyze usage of the Service; to improve our content, service and product offerings; deliver information to you that, in some cases, is relevant to your interests; customize your experience, the content, layout and services; detect and protect us against error, fraud and other criminal activity; enforce each Agreement; provide you with system or administrative messages; and/or as otherwise described to you at the time of collection. These uses improve the Services and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the Services.

3. Our Disclosure of Information and Data

- (a) *General Disclosure.* We may share your Information and Data with third parties only in the ways that are described in this Privacy Policy, each Agreement and in accordance with your consent. We will not share, sell or rent your Information and Data to third parties without your explicit consent.
- (b) *Anonymized Aggregated Data.* We may aggregate and anonymize Data and use and disclose it for a variety of purposes, including analytics to improve our algorithms, measure service usage, publish summaries and develop new features. However, in these situations, we do not disclose any Information.
- (c) *Subsidiaries, Affiliates & Service Providers.* We may use the services of subsidiaries, affiliates and third party service providers (collectively, “**Third Parties**”) in connection with our provision of the Services, including, without limitation, for the processing of payments, off-premise data hosting, communication services, account hosting, and Information collecting and analysis services. We may disclose your Information and Data to the Third Parties in the course of our use of their services. We take care to use Third Parties that we believe are reputable and capable of performing the services we require of them, including, without limitation, the handling of confidential information and Information and Data and the compliance with all applicable laws.
- (d) *Laws and Jurisdictions.* Notwithstanding anything to the contrary in this Privacy Policy, we may preserve or disclose Information and Data if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or any other person’s or entity’s rights or property. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party’s, including a government’s, request to disclose your Information and Data.
- (e) *Sale of Business.* We may disclose Information and Data to the acquiror or its agents in the course of the sale of our business. If we do this, the disclosure will be subject to confidentiality arrangements customary in such transactions.
- (f) *Storing and Processing Information and Data.* In some cases, Information and Data that we collect may be stored or processed outside of Canada. When that occurs, we continue to protect the Information and Data with appropriate safeguards and data export requirements, but it may be subject to the legal jurisdiction of those countries and governmental authorities in those countries.

4. Correcting and Updating Information and Data

You may review, delete and update your Information through your Account and/or Login or by contacting us, to ensure it is accurate and complete on the Service.

5. Information and Data Retention

- (a) *General Retention Policy.* We keep Information and Data for as long as it is required for the purposes for which it was collected, which is determined in our sole discretion, in accordance with the applicable laws. Notwithstanding the foregoing, we may periodically de-identify (a) Information from collected Data in unused Accounts; and (b) unnecessary Information from Data collected elsewhere on and/or through the Service. Subject to the terms and conditions of this Privacy Policy and applicable law, with the exception of aggregated Data, we may delete unused Accounts and the Information and Data associated with them.
- (b) *Termination of Account and/or Login.* If your Account is terminated, we may deactivate it, but we may retain your Information and Data for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy.

6. Communication Preferences

You can always unsubscribe from our commercial and promotional emails, but we may still send you communications relating to the applicable Account and use of the Service.

7. Children's Privacy

The Service is not intended for children under the age of eighteen (18). Trelent does not target its Service to children under eighteen (18). Trelent does not intentionally or knowingly collect Information and Data from children under the age of eighteen (18) and does not knowingly allow such persons to use the Services.

8. Your Information and Data Rights

In accordance with the applicable privacy laws, you may have the following rights with respect to your Information and Data:

- (a) *Right to Erasure and Restriction.* You may ask us to remove and/or restrict our processing of your Information and/or Data in certain circumstances (e.g. if you believe we have processed your Information and/or Data unlawfully, if you believe that your Information and/or Data is no longer necessary for the purposes in which it was collected or processed, you withdraw your consent, as discussed below). Notwithstanding the foregoing, despite such request, subject to all applicable laws and the terms and conditions of this Privacy Policy, we may still retain your Information and Data for legitimate business interests, to collect any fees owed (if and as applicable), resolve disputes, troubleshoot problems, analyze usage of the Services, assist with any investigations, prevent fraud, enforce our Agreements and/or take other actions as required or permitted by law.
- (b) *Right to Withdraw Consent.* Where we have asked for your consent to use and/or process your Information and Data, you can withdraw this consent at any time. We will do our best to accommodate your request, subject to applicable laws and the terms and conditions of this Privacy Policy. Please note that if you withdraw your consent, we may not be able to provide you with the Services.

Please contact us at contact@trelent.net if you would like to exercise any of the above rights.

9. Security

Each Account and/or Login is protected by a password for your privacy and security. You must prevent unauthorized access to an Account and/or Login by selecting and protecting your password appropriately and limiting access to

your device. We strive to protect your Information and Data by putting in place a range of technical and organizational measures to safeguard and secure the Information and Data we receive from you, including without limitation, security technologies. We are continuously utilizing security measures to protect your Information and Data from unauthorized access or against loss, misuse or alteration. Despite our efforts, we cannot guarantee the security of any Information and Data. Unauthorized entry or use, hardware or Service failure and other factors, may compromise the security of Information and Data at any time.

10. Other Information and Data Collectors

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of Information and Data we collect from you. To the extent that you disclose Information and Data to other parties through the Service, different rules may apply to their use, collection and disclosure of Information and Data. Since we do not control the Information and Data use, collection or disclosure policies of third parties, you are subject to their privacy policies. We encourage you to ask questions before you disclose Information and Data to others.

11. Changes to This Privacy Policy

Trelent may amend this Privacy Policy from time to time. The use of Information and Data we collect is subject to the Privacy Policy and each Agreement in effect at the time the Information and Data is used. If we make any material changes in the way we use Information and Data you provide to us, we will notify you by (a) posting a notice on the Site or elsewhere on the services; (ii) sending you an email at the address registered on the applicable Account and/or Login; and/or (iii) otherwise notifying you pursuant to the notice or modification provisions in the applicable Agreement. You are bound by any changes to the Privacy Policy and the applicable Agreement when you use the Service after such changes have been first posted, subject to the terms and conditions of each Agreement, as applicable.

12. Questions?

It is our goal to make our privacy practices easy to understand. If you have questions, concerns or if you would like more detailed information, please email us at contact@trelent.net.