

DESA ANALYTICS CORPORATION PRIVACY STATEMENT

Last updated: February 29, 2024

Desa Analytics Corporation and its affiliates (collectively, “Desa”, “we”, “our” or “us”) recognize the importance of privacy. The purpose of this privacy statement (“**Privacy Statement**”) is to inform you about our privacy practices, including how we collect, use and disclose your Personal Information.

This Privacy Statement applies to all of our operations in Canada or operations in connection with Canada, unless we have provided you with a separate privacy statement for a particular product, service or activity.

Privacy Statement Updates

This Privacy Statement is current as of the “last updated” date which appears at the top of this page. We may modify this Privacy Statement from time to time. When changes are made to this Privacy Statement they will become immediately effective when published in a revised Privacy Statement posted on our website (as defined herein) unless otherwise noted. We may also communicate the changes through our services or by other means.

Please review this Privacy Statement carefully. By submitting your Personal Information to us, by registering for or using any of the services we offer, by using our website, or by voluntarily interacting with us, you consent to our collecting, using and disclosing your Personal Information as set out in this Privacy Statement, as revised from time to time.

WHAT THIS PRIVACY STATEMENT COVERS

This Privacy Statement covers the following topics:

- Meaning of Personal Information
- Your Consent to Collection, Use and Disclosure
- Personal Information We Collect
- How We Use Your Personal Information
- How We Share Your Personal Information
- Opting Out of Communications
- Retention of Personal Information
- Information Security
- Accessing and Updating Your Personal Information
- International Transfer and Storage of Information
- Third Party Websites and Services
- Children’s Information
- How to Contact Us

Meaning of Personal Information

"Personal Information" means information about an identifiable individual as described under Canadian privacy laws. This information may include (without limitation) your name, mailing address, e-mail address and telephone number.

Personal Information does not include any business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as (without limitation) your name, position name or title, work address, work telephone number, work fax number or work electronic address.

Personal Information also does not include information that has been anonymized or aggregated in such a way that there is no serious possibility it can be used to identify an individual, whether on its own or in combination with other information.

Your Consent to Collection, Use and Disclosure

We collect, use and disclose your Personal Information with your consent or as permitted or required by Canadian privacy laws. How we obtain your consent (i.e., the form we use) will depend on the circumstances, as well as the sensitivity of the information collected. Subject to applicable laws, your consent may be express or implied, depending on the circumstances and the sensitivity of the Personal Information in question.

If you choose to provide Personal Information to us, we assume that you consent to the collection, use and disclosure of that Personal Information as outlined in this Privacy Statement.

If you wish to withdraw your consent to our collection, use or disclosure of your Personal Information, please contact us using the contact information in the “How to Contact Us” section below. However, before we implement the withdrawal of consent, we may require proof of your identity. In some cases, withdrawal of your consent may mean that we will no longer be able to provide certain products or services.

If you provide Personal Information about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect, use and disclose his or her information as described in this Privacy Statement.

Personal Information We Collect

The Personal Information we collect is generally in one or more of the following categories.

- *Products and Services.* For individuals located in Canada who use our products and services, we may collect information from you or from your use of our products or services.
 - We collect Personal Information that you submit through your use of our products or services, such as your name, e-mail address, fax number and other contact information.
 - We may automatically collect usage data that is identifiable with you when you use our products and services.
- *Website.* For individuals located in Canada who visit our website located at www.desaanalytics.io or any of our related websites (collectively, “**our website**”), we may collect information from you or from your activities on the site.
 - Like most websites and other Internet services, we may collect certain technical and device information about your use of our website. Such information may include your Internet protocol address, information about your device, browser and operating system, and the date and time of your visit.

- We may also use “cookies” or enlist third party services which use cookies to track your preferences and activities on our website. Cookies are small data files transferred to your computer’s hard-drive by a website. They keep a record of your preferences, making your subsequent visits to the site more efficient. Cookies may store a variety of information, including the number of times that you access a site, your language preferences and the number of times that you view a particular page or other item on the site. The use of cookies is a common practice adopted by most major sites to better serve their users.
- You have a variety of tools to control the data collected by cookies, web beacons, and similar technologies. For example, you can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies. You should note, however, that without cookies some of our website’s functions may not be available.
- Other Interactions. For individuals located in Canada who otherwise interact with us, whether in person, by phone or email, through social media or otherwise, including individuals who might be interested in acquiring our products or services, who sign-up to receive newsletters or other communications, or who respond to surveys and questionnaires, we may collect information that you provide to us during these interactions. This information may include your name, e-mail address and other contact information.

How We Use Your Personal Information

We may use your Personal Information for purposes such as:

- providing you with our products and services and supporting your use of our products and services;
- contacting you relating to our products and services;
- monitoring the usage of our products and services to support their proper functioning and further improvement;
- analyzing the needs and activities of our customers to help us better serve them;
- generating de-identified data to conduct research and analysis related to our business, products and services;
- responding to inquiries and other requests;
- collecting opinions and comments about our products and services;
- providing you with information that we think may interest you, including information about our products and services; and
- investigating legal claims.

We may use your Personal Information for purposes for which we have obtained your consent, and for such other purposes as may be permitted or required by applicable Canadian privacy laws.

We do not use the information we collect to advertise third party products and services or targeted advertising of Desa products and services across third party websites or service offerings.

How We Share Your Personal Information

We rely on third party services providers to perform a variety of services on our behalf, such as e-commerce providers, payment card processors, telephone and technical support providers, hosting, data storage and processing service providers, and research and analytics providers.

If we provide your information to service providers, then we require that the service providers keep your Personal Information secure, and only handle it for limited purposes for which it is provided. We do not authorize the service providers to disclose your Personal Information to unauthorized parties or to use your Personal Information for their direct marketing purposes. If you would like more information about our service providers, please contact us using the contact information in the “How to Contact Us” section below.

Additionally, we may use and disclose your information when we believe such use or disclosure is permitted, necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce the terms of the agreements for our products and services; (e) to protect our rights, operations or property; and (f) to allow us to pursue available remedies or limit the damages that we may sustain. In addition, we may transfer your Personal Information and other information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets, or other business transaction.

If we otherwise intend to disclose your Personal Information to a third party, we will identify that third party and the purpose for the disclosure, and obtain your consent.

Opting Out of Communications

If you no longer want to receive marketing-related emails from us, you may opt-out of receiving marketing-related emails by clicking the “unsubscribe” link at the bottom of any email you receive from us. You may also opt-out by contacting us directly using the contact information in the “How to Contact Us” section below.

We will endeavour to respond to your opt-out request promptly, but we ask that you please allow us a reasonable time to process your request. Please note that if you opt-out from receiving marketing-related emails, we may still need to send you communications about your use of our products or services, or other matters.

Retention of Personal Information

We will use, disclose or retain your Personal Information only for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by Canadian privacy laws.

Information Security

We have implemented physical, organizational, contractual and technological security measures with a view to protecting your Personal Information from loss or theft, and unauthorized access, disclosure, copying, use or modification. We have taken steps to ensure that the only personnel who are granted

access to your Personal Information are those with a business 'need-to-know' or whose duties reasonably require such information.

Despite the measure outlined above, no method of information transmission or information storage is 100% secure or error-free, so we unfortunately cannot guarantee absolute security. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any information that you provided to us has been compromised), please contact us immediately using the contact information in the "How to Contact Us" section below.

Accessing and Updating Your Personal Information

We expect you, from time to time, to supply us with updates to your Personal Information, when required. We will not routinely update your Personal Information, unless such a process is necessary.

You may make a written request to review any Personal Information about you that we have collected, used or disclosed, and we will provide you with any such Personal Information to the extent required by applicable laws. You may also challenge the accuracy or completeness of your Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required.

We may require that you provide sufficient identification to fulfill your request to access or correct your Personal Information. Any such identifying information will be used only for this purpose.

International Transfer and Storage of Information

Your Personal Information may be stored and processed at our offices in Canada or at the offices of our third party service providers, or at data centers managed by us or third party service providers, in Canada and the United States. While your Personal Information is outside of Canada, it is subject to the laws of the country in which it is located. Those laws may require disclosure of your Personal Information to authorities in that country. For written information about our policies and practices regarding service providers outside of Canada, contact us immediately using the contact information in the "How to Contact Us" section below.

Third Party Websites and Services

Our website allows you to purchase, subscribe to, or use other products and online services from third parties with different privacy practices, and those other products and online services are governed by their respective privacy statements and policies. This Privacy Statement does not extend to any websites or products or services provided by third parties. We do not assume responsibility for the privacy practices of such third parties, and we encourage you to review all third party privacy policies prior to using third party websites or products or services.

Children's Information

Our products and services are not intended for children under the age of 16, and we do not knowingly collect Personal Information from children under the age of 16. Children under the age of 16 should not use our products and services and should not provide us with their Personal Information.

How to Contact Us

All comments, questions, concerns or complaints regarding your Personal Information or our privacy practices should be sent to our Privacy Officer as follows:

Address: Attention: Privacy Officer

By e-mail: inquiries@desaanalytics.com