

Notified Right Privacy Policy

DJS VENTURES LTD., operating as **NOTIFIED RIGHT**, and its Affiliates (“**Company**”, “**we**”, “**our**” or “**us**”), recognizes that your right to privacy is an important issue, and is committed to maintaining the accuracy, security and privacy of personal information in accordance with applicable law. The Company is subject to the requirements of the Alberta *Personal Information Protection Act* and other applicable personal information protection laws and the decisions of court or regulatory authorities (collectively, “**Privacy Laws**”) and this privacy policy (this “**Policy**”) is intended to clarify the Company’s practices regarding the collection, use and disclosure of such personal information. Reference to “**personal information**”, including “**your personal information**”, includes both your personal information and any personal information you submit on behalf of a deceased person. Nothing in this Privacy Policy will limit the Company’s rights and obligations pursuant to such Privacy Laws. “**Affiliates**” means any entity directly or indirectly controlling or controlled by, or under control with, DJS Ventures Ltd.

This Policy applies to your use of our Website (defined below), software, and services (“**Services**”) and describes the kinds of personal information we collect about any individuals or person that view, use, or interact in any manner with our Website and Services (such individuals or persons referred to as “**you**” and “**your**”), how we use it, how we protect it, and under what circumstances we share it with third parties. This Policy also describes the decisions you can make about your personal information. You may require us to change, amend, or delete the personal information that you have provided to us at any time. This Policy does not apply to information that is protected by other Company policies and practices or through contractual arrangements, unless specifically provided for in such contractual arrangements.

CONSENT

BY SUBMITTING PERSONAL INFORMATION TO THE COMPANY OR ITS SERVICE PROVIDERS AND AGENTS, YOU AGREE THAT THE COMPANY AND ITS SERVICE PROVIDERS AND AGENTS MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY PRIVACY LAWS. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Company’s Privacy Officer. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide the Company or its service providers and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Policy. For certainty, if you are providing the Company with the personal information of a deceased person for the purposes of using the Services or any other purposes, you represent that you are an authorized agent (including, but not limited to, being an executor, liquidator, or court appointed representative of the estate) (an “Authorized Agent”) of such deceased person.

Please also note that, where the Company has requested your consent to collect, use or disclose your personal information (or the personal information of a deceased person for whom you are an Authorized Agent) in circumstances where such consent is not required under privacy laws, or the Company has otherwise done anything relative to your personal information not strictly required of it under Privacy Laws or obligations, the Company does not waive its rights under such privacy laws as a result thereof.

If this Policy changes in the future, we will post an updated version on our website at

<http://notifiedright.ca/> (the “**Website**”). We recommend that you check this Website periodically in order to review our current Policy. You can tell if this Policy has changed by checking the effective date that appears at the bottom of this Policy. Depending on the circumstances, we may also decide to send you a notice in other ways in our discretion, such as via email or other contact information you have provided that the Policy was changed. If you continue to use our Services after the Policy changed or notice of the change has been given, you will be deemed to have accepted such changes.

1 Information We Collect

When you use our Services, we collect the following types of information:

- (a) **Account information:** When you use our Services you may need to create an account with us. In order to create an account, you will need to provide us with login credentials (which include your username and password), your name, email address, postal address, and phone number.
- (b) **Personal information of the deceased.** In order to use our Services, you may be asked to submit the name, address, telephone number, and date of death of the deceased individual(s) for whom you are an Authorized Agent.
- (c) **General usage data:** When you use our Services we may collect technical properties of hardware and software utilized in conjunction with our Services. For example, we may collect the type and model of hardware and/or web browser you are using, referring or exit web pages, and the operating system version you are using. We may also collect information about how long you use our Service in each session, features you use in our Services, and how long you use our Services overall.
- (d) **Purchase and Payment Information:** Payments processed through our site are made through third party payment processors Bambora and PayPal. These sites, like all third party sites we rely on, operate independently of us. We strongly encourage you to review their privacy policies located here:
 - <https://www.bambora.com/en/ca/privacy-policy/>
 - <https://www.paypal.com/ca/webapps/mpp/ua/privacy-full>

2 While payments made through our Services are processed through a third party, we may collect information to administer, manage, and fulfill the purchases you make. For example, we may collect your name, email address, account information, what is ordered, the date and time of the order, the quantity and price of the order, whether payment was made, method of payment, purchase history, and if you re-ordered.

- (a) **Location information:** When you use our Services, we collect your postal address and Internet Protocol (“IP”) address.
- (b) **Third party information:** If necessary to fulfill our identified purposes, we may combine the information you submit to us with information obtained from other sources or third party offerings. For example, we may receive personal information about you from third parties involved in providing you with other services you are using, such as from your email or social media provider to facilitate the integration of those services and websites with our Services. We treat all such personal information in accordance with this Policy and the terms and conditions between us and such third parties, if any, may also apply. However, the third party's own use of your personal information in such cases will be

determined by your agreement(s) with the third party, unless that third party is one of our service providers.

- (c) **Quality assurance and customer service:** Your customer service interactions with us and our service providers, such as email correspondence, telephone calls, or instant messaging conversations, if any, may be recorded, logged, and/or monitored for quality assurance and customer service purposes such as to assist in addressing your inquiries, troubleshooting, training and analytics to identify trends and make improvements to our Services and customer service. As part of the recording and logging of the calls and emails, we will collect information like the identity of the caller or sender of email, the date and time of the call or email, and the subject and resolution of the issue.
- (d) **Cookies:** In addition, when you visit our Website, we collect certain information about your activity on our Website, as described below under the heading “Our Use of Cookies, Log Files, Web Beacons, and Embedded Scripts”.

Some of this information would not by itself identify you to us or be personally identifiable and is therefore considered non-personal information. If we combine any such non-personal information with other personal information available to us, the combined information will be treated as personal information in accordance with this Policy.

3 Our Use of Information We Collect

We use the personal information we collect from you:

- (a) to understand and meet your needs and preferences, and/or to provide you with our Services, for example:
 - (i) for purposes related to the billing, activation, provision, maintenance, support, trouble shooting, resolving of disputes, deactivation, upgrade, or update of Services;
 - (ii) to process and fulfill your order, send you emails to confirm your order status and shipment, send you Services or goods you order, and allow you to pay for Services and goods you order;
 - (iii) to ensure Services are technically functioning as intended and to help identify and troubleshoot issues;
 - (iv) to fulfill or enforce any agreements or notices we provide and are associated with a particular Service (“**Notices**”);
 - (v) to manage or respond to your inquiries;
- (b) to develop new and enhance existing Services including to communicate with you about them using various means, for example to make available or send to you upgrades or updates, or notices of upgrades or updates of Services;
- (c) to manage and develop our business and operations, for example;
 - (i) to detect, monitor, investigate, mitigate or attempt to prevent fraud and technical or security issues or to protect our property;
 - (ii) to allow for business continuity and disaster recovery operations;
 - (iii) to enforce our legal rights;
 - (iv) for statistical purposes;

- (d) to meet legal and regulatory requirements and to respond to emergency situations, for example:
 - (i) to respond to court orders, warrants or other lawful requests or legal processes;
 - (ii) to provide emergency assistance in situations that may threaten the life or physical safety of you or others; or
 - (iii) for any other purposes for which you have consented, such as those that may be set out in Notices, and other purposes as permitted or required by any applicable law.

Notwithstanding anything to the contrary contained in this Policy, we may remove personal identifiers from the information you submit and maintain and use it in a de-identified form that may be combined with other information to generate aggregated information. Such de-identified and/or aggregated information will be deemed to be owned by us and we shall have unrestricted title, rights, and interest to the de-identified and/or aggregated information which may include, without limitation, the right to use, distribute, transmit, transfer, license, trade, rent, share, assign, and sell the de-identified and/or aggregated information. We will retain personal information as long as necessary for the fulfillment of the identified purposes or as otherwise necessary to comply with applicable laws.

You may update your communication preferences anytime by writing us at support@NotifiedRight.ca.

4 To whom we Disclose your Personal Information

In accordance with this Policy, we may share your personal information or the personal information of the deceased person for whom you are an Authorized Agent:

- (a) within Company and/or with our service providers such as a cloud service provider in Canada, the United States, the European Economic Area, and any other country, for data storage purposes;
- (b) with our financial, insurance, legal, accounting or other advisors that provide professional services to us;
- (c) if we have your consent;
- (d) with third parties involved in providing our Services to you which may include authorized resellers, joint venture partners, distributors, and merchants of record or payment processors;
- (e) and any and all information about your use of the Services with your employer or its agents if your employer has provided you with access to the Services;
- (f) as necessary to complete any transactions while using our Services;
- (g) respond to a subpoena, order, legal process, or government request;
- (h) protect, establish or exercise our legal rights or defend against legal claims;
- (i) investigate, detect, suppress, prevent or take action regarding illegal or prohibited activities, suspected fraud, situations involving potential threats to the reputation or physical safety of any person;
- (j) as otherwise required by law; or

- (k) if we are to be sold, merged, or amalgamated or substantially all of its assets are to be sold or disposed of, your personal information may be transferred to a potential purchaser if, and to the extent necessary, it is required for the purposes of deciding whether to proceed with the proposed transaction and completing it. If such a sale, merger, acquisition, or disposal is completed, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with this Policy. Following such a sale or transfer, you may contact the entity to which we transferred your personal information with any inquiries concerning the processing of that information.

5 Your Decisions About Your Personal Information

At any time you can contact us to: review the personal information held by us in connection with your account; withdraw your consent for our use and disclosure of your information; request a list of third parties to which we may have provided your personal information; close your account; and amend your personal information, by writing to us at support@NotifiedRight.ca or Notified Right 400 - 7015 Macleod Trail SW, Calgary AB T2H 2K6.

If you contact us to do any of the things listed above, we may require you to provide sufficient personal information to allow us to identify you and tell you about the existence, use and disclosure of your personal information and this personal information will only be used for this purpose. If you contact us about your personal information, we will respond to your request within a reasonable time and at minimal cost or no cost to you in accordance with applicable laws.

Generally, you may withdraw at any time your consent for us to collect, use, and disclose your personal information in accordance with this Policy, subject to legal or contractual restrictions and reasonable notice. As such, we may continue to collect, use, and disclose your personal information as may be required to provide you with our Services, and to the extent that we are contractually obligated to do so or as necessary to enforce any contractual obligations you may have with us. If you refuse to provide us with the information we require or later contact us to withdraw your consent for us to use and disclose your personal information, we may no longer be able to provide you with our Services.

6 Privacy and our Website

7 Our Use of Cookies, Log Files, Web Beacons, and Embedded Scripts

When you visit the Website, we may collect certain information by automated means, such as through server log files, cookies (text files sent to and stored on your device when you access the Website), web beacons (also known as clear GIFs and pixel tags, which may be used to transmit information back to the Website), and embedded scripts (programming code that is designed to collect information about your interactions with the Website, such as the links you click on, and which is active only when you are accessing the Website). The information we collect in this manner may include details about the computer, mobile phone, or other device used to access the Website (such as browser type, operating system, and IP address), referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services to help us analyze how visitors use the Website. We may permit these third parties to operate directly on the Website, use their own technology (such as cookies or web beacons), and collect information about you on our behalf. The information we collect in this manner is collected to enhance your user experience. For example, this information allows us to pre-fill form fields as well as provide you with contextual recommendations while using the Website. In some instances, we may also combine information we receive about you from third parties with information we collect through the Website.

You can reset your browser either to notify you when you have received a cookie or refuse to accept cookies. However, if you refuse to accept cookies, you may not be able to use some of the features available on our website.

Email Communications

Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the services of the Company and other third parties with whom we have a relationship. You can always unsubscribe from receiving promotional emails from us by simply clicking the “unsubscribe” link provided at the bottom of every promotional email from us.

Online Communications

In order to provide you with Services or information, you may voluntarily submit personal information to us through our Website for purposes such as conducting business online, asking a question, obtaining information, reviewing or downloading a publication, participating in an event, and participating in surveys. If you are known to the Company as a registered member of the Services, we may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected. All collection, use and disclosure of personal information obtained through our website shall be subject to this Policy and applicable privacy laws.

Links to Other Sites

We provide links on our Website to third party sites we think you will enjoy. These sites operate independently of us and may have established their own privacy and security policies. Any personal information you provide on linked pages or other sites is subject to that third party’s privacy policy. We strongly encourage you to review these policies at any site you visit. This Policy does not apply to such linked pages or other sites, and we are not responsible for the content or practices of any linked websites which are provided solely for your convenience.

8 Security

We aim to provide you with a safe experience. We have in place certain physical, technical, and administrative safeguards designed to appropriately protect the security and privacy of your personal information against loss, theft, and unauthorized access, disclosure, copying, use, or modification. Please note, however, that we cannot guarantee that the measures we maintain will guarantee the security of the information.

We limit access to your personal information within the Company to individuals with a need to know.

Your personal information may be collected, used, processed, transferred, and retained in multiple countries including Canada, the United States, the European Economic Area, and other countries, which may be outside the region in which you are situated and may have different privacy or data protection legislation, and may therefore be subject to the laws of these countries. If you are a resident of the European Economic Area or a country which restricts data transfers outside of that jurisdiction or region without your consent, by using our Services, you consent to your personal information being transferred outside of the European Economic Area or your country for processing or storage by or on behalf of us.

9 Children's Online Privacy Protection

The Website and Services are not intended for use by children under 18 years of age. We do not knowingly collect or use any personal information from any children under 13 years of age. If we become aware that we have unknowingly collected personal information from a child under the age of 13, we will make commercially reasonable efforts to delete such personal information from our database.

10 Questions or Comments

The Company has appointed a privacy officer to oversee compliance with this Policy and applicable privacy laws (the "**Privacy Officer**"). If you have any questions about (a) access to personal information, (b) the collection, use, management or disclosure of your personal information, (c) changing or withdrawing consent with respect to personal information, or (d) obtaining more information about this Policy or relevant legislation, please contact the Privacy Officer by telephone or in writing or by e-mail at:

Notified Right
Attention: Privacy Officer
400 – 7015 Macleod Trail SW
Calgary AB T2H 2K6

Toll Free: 1-877-351-9523
Local: 1-587-329-6773

support@notifiedright.ca

If you contact us about your personal information, we will respond to your request within a reasonable time and at minimal cost or no cost to you in accordance with applicable laws. Depending on the circumstances and applicable laws, we may refuse to process certain access requests (for example, access requests that are unreasonably repetitive or systematic, would be extremely impractical or require disproportionate technical effort). If you are not satisfied with the Company's response, you may be entitled to make a written submission to the privacy authority applicable for your jurisdiction.

You may wish to address a concern regarding the Company's compliance with the above principles to the Company's Privacy Officer. The Company shall investigate all complaints. If a complaint is found to be justified, the Company shall take appropriate measures to resolve the complaint, including, if necessary, amending this Policy and associated practices.

Effective Date: August 5, 2018