



Privacy Policy

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District Ventures doing business as Venturepark and its affiliates or subsidiaries ("**we**", "**us**", "**our**", and similar expressions) value your privacy and we want you to understand how we collect, use, maintain, protect, and disclose your personal information when you visit our website and any of its sub-domains (our "**Website**"), use our services, sign up for an account with us (an "**Account**") (the foregoing collectively, the "**Services**") and otherwise interact with us. By using our Website or any of our Services, you are agreeing to the terms of this Privacy Policy and, as applicable, our Website Terms of Use, Services Terms and Conditions and other policies applicable to our relationship with you.

1. How does this Privacy Policy apply?

This Privacy Policy describes what we do with personal information that we collect and use for our own purposes (i.e., where we are a controller), such as your Account information and information about how you use and interact with our Website and Services, including information you submit to our customer support. "Personal information" is generally any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a natural person.

2. What personal information do we collect about you and how do we collect it?

There are several types of information we collect about you:

- a. **Information directly from you.** We collect personal information you give us directly. For example, when you create an Account with us you will give us information like your email address, first and last name, business name, payment information, and your username and password. You may also provide us with other optional information as part of your Account profile, such as avatars or profile images, other contact information, and links to social network profiles you have (including when used for authentication purposes). We may also collect information directly from you for contractual or legal reasons. For example, we may ask you to select your jurisdiction when you sign up for Services to determine if, and how much, tax we need to collect from you. We'll normally let you know when information is required, and the consequences of failing to provide it. If you do not provide personal information when requested, you may not be able to use our Services if that information is necessary to provide you with the service or if we are legally required to collect it.
- b. **Communications.** Personal information you include in your communications with us, such as information you include in SMS or RCS (text) messages, form submissions on the Website, and other

electronic messages between you and us (collectively, "**Electronic Messages**") or by phone or mail, and information you post on or through the public areas or features on our Website or in the Services.

- c. **Information from your use of the Website and Services.** We collect personal information about you when you use our Website and Services. This includes information like your Internet protocol (IP) address, your geographic location, the website you visited before coming to our Website, your browser type and settings, log data, your device information (for example, if you're using a tablet, mobile phone, or desktop computer and the operating system), the date and time when you visited the Website, information about your browser configuration and plug-ins, your language preferences, and other unique identifiers, information about how you interact with the Website and Services, the information we collect when you complete a transaction with us through the Services, and usage data you may provide to us through the communication and help and support systems through the Website and our Services.
- d. **Information from cookies and other tracking technologies.** We collect information about you through cookies and similar tracking technologies to provide and support our Website and the Services. More information on our use of cookies is available in our Cookies Policy.
- e. **Marketing preferences, surveys, contests, or promotions.** Information you include in your marketing preferences with us or that you provide as part of a survey, contest, or promotion that we run and in which you participate.
- f. **Information from others.** Information we get from our partners to support our marketing initiatives, improve our Services, and better monitor, manage, and measure our ad campaigns, such as details about when our partner shows you one of our ads on or via its advertising platform. We may also collect information about you from our business partners that assist us with providing our Services, developing our business and understanding our market. We also collect personal information about you from third-party service providers that assist us with verifying your identity. Our Services may also use single sign-on integrations through other platforms and providers (e.g. signing in through a social media account), which includes information sharing between us and the single sign-on provider. We refer to these third-party service providers in this Privacy Policy as "**Third Party Providers**". We are not responsible for errors, omissions, data breaches, loss of information, or any other losses (tangible or intangible, including lost profits, revenues, data, or goodwill and consequential losses) regarding your personal information resulting from the actions of others, including Third Party Providers.
- g. **Inferences and profiling.** We use personal information we collect from you and the other sources identified in our Privacy Policy to create a profile about you to reflect your preferences, characteristics, behavior, and other similar characteristics to better understand you and how our Website and Services may be relevant to you.

3. **How do we use your information?**

We use information that we collect about you or that you provide to us, including any personal information for several purposes:

- a. **To make our Website and Services available to you.** We use your personal information to provide the Website and Services to you and to respond to your requests. We also use it to personalize our Services.
- b. **To communicate with you.** We use your personal information to communicate with you, including to send you emails about the Services and your relationship with us.
- c. **To market and promote our business to you.** We use your personal information to market our Website, Services and business to you, including through surveys and promotions. We may use your information to send you tailored marketing communications about products, services, offers, programs, and promotions of ours and those of our partners and measure the success of those campaigns. For example, we may send different marketing communications to you based on what we think may interest you based on other information we hold about you.
- d. **To deliver advertisements to you.** We use your personal information to analyze your interactions with our Website and Services and third parties' services so we can tailor our advertising to what we think will interest you. For example, we may decide not to advertise our Services to you on a social media site if you already signed up for an Account or follow us, and we may choose to serve you a particular advertisement based on your service choices with us or what we think may interest you based on other information we hold about you.
- e. **To customize your experience.** We use your personal information to provide you with customized services. For example, we use your location information to determine your language preferences or display accurate date and time information. We also use cookies and similar technologies for this purpose, such as remembering your preferences.
- f. **To improve our Website, Services, and customer experience.** We use your personal information to analyze and learn about how you access and use the Website and Services, to evaluate and improve our Website and Services (including by developing new products and services and managing our communications), and to monitor and measure the effectiveness of our advertising. We usually do this based on anonymous, pseudonymized, or aggregated information which does not focus on you individually. For example, if we learn that most people using our Services in a location or for a particular purpose tend to use a specific integration or feature, we might wish to expand on that integration or feature.
- g. **To make our Website and Services secure.** We use your personal information to keep our Website and our Services secure, such as when we use your personal information to verify your identity and access credentials.
- h. **To manage our third-party relationships.** We use your personal information to manage our vendor, service provider, and partner relationships.
- i. **To enforce our rights and to meet our obligations.** We use your personal information to carry out our obligations and enforce our rights under contracts and our terms of service, for billing matters, or to comply with legal requirements. We may also use your personal information to protect our and others' interests, rights, and property.

- j. **To comply with the law.** We use your personal information to comply with applicable legal requirements, such as tax and other government regulations, contracts, and law enforcement requests. We will also use your personal information to give you notices about your relationship with us.
- k. **To fulfill the purposes for which you provided the information to us.** We use your personal information when you give it to us for a specific purpose or for reasons that were described when it was collected, or any other purpose for which you provide it, including for any other reason described in this Privacy Policy.

4. **When do we use your information?**

We use your personal information for the purposes we describe in our Privacy Policy or the reasons we describe when we collect it when:

- a. **Consent.** You have consented to the use of your personal information in a particular way. When you consent, you can change your mind at any time.
- b. **Performance of a contract.** We need your personal information to provide you with services and products requested by you or to respond to your inquiries. In other words, so we can perform our contract with you or take steps at your request before entering into one. For example, we need your email address or other credentials so you can sign-in to your Account.
- c. **Legal obligation.** We have a legal obligation to use your personal information at times, such as to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request.
- d. **Legitimate interests.** We have a legitimate interest in using your personal information. In particular, we have a legitimate interest in the following cases:
 - i. To operate our business and provide you with tailored advertising and communications to develop and promote our business.
 - ii. To analyze and improve the safety and security of our Website and Services, which is necessary to pursue our legitimate interests in ensuring our Website, Services, and assets are secure, such as by implementing and enhancing security measures and protections and protecting against fraud, spam, and abuse.
 - iii. To provide and improve the Website and Services, including any personalized services. We do this to pursue our legitimate interests of providing an innovative and tailored offering to our users.
 - iv. To share your personal information with other companies that help us to provide and improve the Website and Services.
 - v. To anonymize and subsequently use anonymized information. Personal information does not include information that has been anonymized or aggregated in such a way that it can no longer be used to identify a specific natural person, whether on its own or in combination

with other information. We may use your personal information to create this kind of anonymized or aggregated data.

5. How do we share your personal information?

In addition to other scenarios we have discussed in this Privacy Policy, we may share your personal information in the following ways:

- a. **Affiliates.** We share personal information with our affiliates when it is reasonably necessary or desirable, such as to help provide services to you or analyze and improve the services we or they provide.
- b. **Business partners.** We may share personal information with our business partners. For example, we may share your personal information when our Website, Services, or other assets are integrated with the services of other parties, but only when you have been informed or would otherwise expect such sharing.
- c. **Service providers.** We share personal information with our service providers that perform services on our behalf. For example, we may use third parties to help us provide customer support, manage our advertisements on other sites, send marketing and other communications on our behalf, or assist with data storage. We use a variety of service providers in connection with the Website and Services. We only share your personal information when you have been informed or would otherwise expect such sharing, such as for verification of authenticity, to provide our Services to you, to follow up on your inquiries, or as disclosed at the time the information is collected.
- d. **Following the law or protecting rights and interests.** We disclose your personal information if we determine that such disclosure is reasonably necessary to comply with the law, protect our or others' rights, property, or interests, or to prevent fraud or abuse. In particular, we may disclose your personal information in response to lawful requests by public authorities, such as to meet national security or law enforcement requirements.
- e. **Our own advertising.** We share personal information with third parties so we can provide you with tailored advertising for our business and measure and monitor its effectiveness. For example, we may share your actual or pseudonymized email address with a third-party social media platform on which we advertise to avoid serving ads to people who already use our Services.
- f. **Third party advertising.** We share personal information with third parties so they can provide you with tailored advertising regarding their business and measure and monitor its effectiveness. For example, we may allow third parties to post their advertisements on our Website or in our Services and those third parties may use your personal information to measure how those advertisements perform and to show you ads that you may be interested in.
- g. **Business transfers.** If we're involved in a reorganization, merger, acquisition, or sale of some or all of our assets, your personal information may be transferred as part of that deal or the negotiation of contemplated deals.

6. Your rights and choices.

- a. **Rights to access, update, change, or delete personal information.** Where applicable law requires (and subject to any relevant exceptions under law), you may have the right to access, update, change, or delete your personal information. You can access, update, delete, or change your personal information directly in your Account or by contacting us at Privacy@venturepark.com to request the required changes. You can exercise your other rights (including deleting your Account) by contacting us at the same email address. Please note that we may need to verify your identity in connection with your requests, and such verification process may, if you do not have access to your Account, require you to provide us with additional information (e.g. government identification). Even if you have access to your Account, we may request additional information if we believe it's necessary to verify your identity. If we are unable to verify your identity or request, we may not, in accordance with applicable law, be able to fulfill your request. Please note that, for technical reasons, there is likely to be a delay in deleting your personal information from our systems when you ask us to delete it. We also will retain personal information in order to comply with the law, protect our and others' rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.
- b. **Commercial electronic messages.** Like many other companies, we may ask you to sign up to receive emails and other Electronic Messages from us. If you no longer wish to receive those messages, you can opt-out by following the unsubscribe link in the messages or by contacting us.
- c. **Data processing and portability.** You may have the right to restrict or object to the processing of your personal information or to exercise a right to data portability under applicable law.
- d. **Complaints.** You may have the right to lodge a complaint with a competent supervisory authority, subject to applicable law.
- e. **Withdrawal of consent.** If we rely on consent for the use or processing of your personal information, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the use or processing of your personal information before your withdrawal of consent.

7. **Please use caution when posting on the public areas or features of our Website and Services.**

You may be able to post or make public communications on certain areas of our Website or Services, such as comments and questions fields, discussion forums, and other public discussion mechanisms. These kinds of communications are made at your own risk. Although we may monitor or even control these types of public posts, we are under no obligation to do so. We also cannot control the actions of other users of the Website or Services, including how they will use your public posts and any personal information you include in them. We cannot and do not guarantee that unauthorized persons will not view your public posts or respect your privacy.

8. **Where we may store and process your information.**

We are based out of Canada, but we may process, store, and transfer personal information in Canada or elsewhere. For example, we could use third-party service providers, such as managed hosting providers, customer relationship management (CRM) systems, and technology partners to provide the necessary software, networking, infrastructure and other services that we use to operate the Website and Services. These third-party providers may process or store personal information on servers outside of Canada.

Locations other than Canada may have different privacy laws, which may be more or less protective. If we move personal information to a location other than Canada, the governments, courts, law enforcement, or regulatory agencies of that country may have access to your personal information through their laws. In addition to Canada, your personal information may be collected, used, disclosed, or stored for any purpose stated in this Privacy Policy in the United States.

7. Québec privacy statements.

- a. Québec residents. This section applies only to Québec residents. It describes how we collect, use, and share personal information of Québec residents in our capacity as an “enterprise” under the Act respecting the protection of personal information in the private sector (“Private Sector Act”) and your rights with respect to that personal information. For purposes of this section, the term “personal information” has the meaning given in the Private Sector Act but does not include information exempted from the scope of the Private Sector Act. Please note that we may claim legal exemptions for certain types of personal information from all or certain parts of the Private Sector Act. In some cases, we may provide a different privacy notice to certain categories of Québec residents, such as employees and job applicants, in which case that notice will apply instead of this section.
- b. Data residency. Personal information may be communicated outside of Québec. Unless exempted under the Private Sector Act, prior to communicating personal information outside of the province we take into account (1) the sensitivity of the information, (2) the purposes for which it is to be used, (3) the protection measures that would apply to it, and (4) the legal framework applicable in the jurisdiction in which the information would be communicated, including the legal framework’s degree of equivalency with the personal information protection principles applicable in Québec. The information may be communicated if the assessment establishes that it would receive protection equivalent to that afforded under the Private Sector Act. We also ensure that where required under the Private Sector Act, the communication of the information is subject to a written agreement that takes into account the results of our assessment and, if applicable, the terms agreed on to mitigate the risks identified in the assessment.
- c. De-indexing. Under certain conditions, you may have the right to have the personal information we make available about you through hyperlinks de-indexed or re-indexed with correct information. To exercise this right, please contact our Privacy Officer.
- d. Portability. You may request portability of your personal information in a readily usable format. To make such a request, contact our Privacy Officer or access the settings available in your Account.
- e. Access. You may request a copy of the personal information by contacting our Privacy Officer or accessing the settings available in your Account.
- f. Correction. You can edit and correct your personal information at any time by changing it directly in our products and services or by contacting our Privacy Officer or accessing the settings available in your Account.

- g. Withdraw consent. If we communicate your personal information with your consent, you can withdraw your consent at any time.
- h. Third persons to whom we communicate your personal information. If applicable, you have the right to be given the name of the third person for whom your personal information is being collected, and the names of the third persons or categories of third persons to whom it is necessary to communicate the personal information for the purposes for which it was collected.

9. How do we keep your personal information secure?

We follow industry standards on information security management to safeguard sensitive information, such as financial information, intellectual property, and any other personal information entrusted to us. Our information security systems apply to people, processes, and information technology systems on a risk management basis. No method of transmission over the Internet, or method of electronic storage, is completely secure. Therefore, we cannot guarantee the absolute security of your personal information.

10. How long do we keep your personal information?

In general, we keep your personal information throughout your relationship with us. Once you terminate your relationship with us, we will continue to store archived copies of your personal information for legitimate business purposes, like defending a contractual claim or for audit purposes and to comply with the law. We will continue to store anonymous or anonymized information, such as website visits, without identifiers, in order to improve our Website and Services.

11. Artificial intelligence (AI) and automated decision-making and your personal information.

AI is a broad term that refers to technologies that can perform tasks that normally require human intelligence, such as understanding language, recognizing images, making decisions, and learning from data. We may use AI with your personal information to:

- Enhance the functionality and quality of our services, such as by providing personalized recommendations, generating content, optimizing performance, and detecting errors.
- Analyze and improve our data, such as by aggregating, anonymizing, or de-identifying information, identifying trends and patterns, and generating insights and reports.
- Develop and test new features, products, and services, such as by experimenting with different algorithms, models, and methods.
- Comply with legal and regulatory obligations, such as by verifying identity, preventing fraud, and enforcing our terms and conditions.

Please note that some AI tools we make available to you on our Website will be from Third Party Providers. Please ensure you review the privacy policies of any third-party AI tools we make available to you

We also may use several machine-learning algorithms and forms of automated decision-making. For example, we use automated decision-making to prevent risk and fraud, to personalize your experience and make it more efficient, and to determine eligibility for certain services or features we offer on our Website and Services. We may also use such technologies to provide and improve the Website and Services and how we deliver them to you.

12. Children and privacy.

Our Website and its features and the Services are not meant for children under 13 years of age. If you are under 13 years old, please do not give us your personal information. If you are the parent or guardian of someone under 13 years of age, please do not give us personal information of that person.

13. How to contact us about privacy questions.

If you have a question or a concern about our Privacy Policy or your personal information, please get in touch with us. Our Privacy Officer can be reached at push@ventureparklabs.ca.

14. Changes to our Privacy Policy.

We may update this Privacy Policy from time to time to reflect, for example, changes to our privacy practices or for other operational, legal, or regulatory reasons. If we make material changes to this Privacy Policy, we will give you notice of such changes by posting the revised policy on our Website, and where appropriate, by other means. By continuing to use the Website or the Services after these changes are posted, you agree to the revised policy.