



# KEO CANADA INC.

PRIVACY AND DATA PROTECTION  
POLICY

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POLICY**

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## 1. COMMITMENT TO PRIVACY

This Privacy and Data Protection Policy (“Policy”) describes the ways Keo Canada Inc. and any affiliate, subsidiary, companies of the same business group, current and future companies, stockholders, individuals, directors, managers, administrators, legal representatives, employees, contractors or any other person related to or controlled by Keo Canada Inc. (collectively, “Keo”) may collect, use, retain, process, share, transfer and disclose Personal Information, as defined below, in connection with its (i) products and services (collectively, the “Keo Services”); and/or (ii) internal administration.

Keo knows that the users of Keo Services (the “Users”) care about how their Personal Information is used and shared; therefore Keo strives to provide Users with exceptional service according to this Policy.

To make this Policy easy to find, it is available on the home page of the Keo website at <http://keoworld.com> (the “Website”). The Users may also e-mail Keo’s Privacy Officer at [privacyprotection@keoworld.com](mailto:privacyprotection@keoworld.com) with any privacy-related questions, comments, or concerns that it may have.

## 2. APPLICABILITY AND OVERVIEW OF PRIVACY AND DATA PROTECTION POLICY

Throughout this Policy, Keo uses the term “Personal Information” to describe information that can be used on its own, or in combination with other information, to identify, contact or locate a specific individual. However, a User’s business contact information, including name, title, and professional contact information is not considered Personal Information. This Policy applies to all Personal Information that Keo collects through the Keo Website, the Workeo Payment App and other sources as more particularly set out herein, from Users.

When Keo shares Users’ Personal Information with third-party service providers, Keo requires the security and confidentiality of Users’ information, as well as limiting their use of the information to what is reasonable and necessary to carry out their work and comply with Applicable Laws, as defined below. For more information on how Keo shares Users’ Personal Information with other parties, see Section 7 (*How Keo shares Personal Information with other Parties*).

This Policy does not apply to third-party websites, plug-ins, services, social networks, or applications that a User may access through the Keo Website or the Workeo Payment App. Clicking on those links or enabling those connections may allow the third party to collect or share data about Users. While Keo attempts to facilitate access only to third parties that share Keo’s respect for Users’ privacy, if Users follow a link to a third-party website, please note that these third parties have their own privacy policies and Keo does not accept any responsibility or liability for these policies. Keo does not control these third-party websites, and we encourage Users to read the privacy policy of every website visited.

This Policy establishes the rules that govern the collection, use and disclosure of Personal Information collected by Keo in the course of business and in compliance with applicable federal and provincial privacy laws in Canada. These include the *Canada Personal Information Protection and Electronic Documents Act* (“PIPEDA”), Alberta’s *Personal Information Protection Act* (“AB PIPA”), British Columbia’s *Personal Information Protection Act* (“BC PIPA”), and Quebec’s *Act Respecting the Protection of Personal Information in the Private Sector* (collectively, “Applicable Laws”).

## 3. ACCOUNTABILITY

Keo is responsible for Personal Information under its control. Accountability for Keo’s compliance with Applicable Laws rests with the Privacy Officer of Keo, even though other Keo employees may be responsible for the day-to-day collection and processing of Personal Information. In addition, the Privacy Officer may delegate to other employees to act on their behalf.

Submissions to the Privacy Officer may be made in writing in accordance with Section 14 (*How to contact us*).

#### 4. PERSONAL INFORMATION KEO MIGHT COLLECT FROM USERS

The information Keo collects from its Users helps Keo personalize and continually improve Users' experience. Here are the types of information we gather:

- **Personal Information that Users Disclose to Keo:** Keo receives and stores any information that Users enter on the Keo Website, the Workeo Payment App, or give us in any other way. Users can choose not to provide certain information.
- **Automatic Information Collection:** Keo receives and stores certain types of information whenever Users interact with the Keo Website or the Workeo Payment App. Additionally, like many Websites, Keo uses "cookies" or other automatic data collection technologies to collect certain information about Users' equipment, browsing actions and patterns, including (i) details of Users' use of the Keo Website and Workeo Payment App, such as traffic data; and (ii) information about Users' computer and internet connection, such as IP address, operating system, and browser type. Keo uses Personal Information collected by automatic data collection technologies to improve the Keo Services and to customize the Keo Services for Users. Users can set their browser to refuse all or some browser cookies, or to alert Users when cookies are being sent. To learn how to manage Flash cookie settings, visit the Flash player settings page on Adobe's website. If Users disable or refuse cookies, please note that some parts of the Keo Website may not be accessible or may not function properly.
- **E-mail Communications:** To help us make e-mails more useful and interesting, Keo often receives a confirmation when a User opens an e-mail from Keo if the User's computer supports such capabilities. If a User does not want to receive e-mails or other mail from us, the User should adjust their communication preferences by using the unsubscribe mechanism at the bottom of our e-mails or sending an email to [privacyprotection@keoworld.com](mailto:privacyprotection@keoworld.com).
- **Information from Other Sources:** Keo might receive information about Users from other sources in compliance with Applicable Laws.
- **Public information:** Keo may collect Personal Information about Users through publicly available information sources on the Internet. It may not always be possible to trace the original source of such information.
- **From third parties:** Keo may collect Personal Information about Users from third parties authorized to share Users' Personal Information.
- **When Users contact Keo:** If Users contact Keo in any manner Keo will keep any information Users provide including records of correspondence, and Users should be aware that Keo may record telephone calls and written correspondence for training and security purposes.
- **Financial Information:** Keo may collect bank account information, routing numbers, transactions, and cards linked to Users' Keo accounts. A User may provide Keo with access credentials (for example, username and password) that allow Keo to gain online access to one or more accounts that the User maintains with a third-party financial institution and that the User chooses to designate for use in connection with the Keo Services (each, an "Authorized Bank Account"). Keo works with one or more third-party service providers that will securely store pursuant to industry standards any Authorized Bank Account access credentials that Users provide to us. Users may only provide account access credentials for and authorize Keo to access valid accounts held in their own names. A User may not provide access credentials for an account that is held by a third person. A User must update their Keo account information to reflect any change to a User's name or password that is associated with any Authorized Bank Account. If a User chooses to provide Users Authorized Bank Account credentials to Keo, the User authorizes Keo to use this information to provide the User with Keo Services. This authorization will remain in effect until the User notifies us that the User wishes to revoke this authorization, which may affect the User's ability to receive Keo Services.

Before permitting Users to use Keo Services, Keo may require additional information from Users to verify their identity, address, or other information or to manage risk and compliance throughout their relationship with Keo.

Keo makes reasonable efforts to protect the security of the Personal Information it collects from Users. Despite Keo's efforts, it cannot guarantee that Personal Information may not be accessed, disclosed, altered, or destroyed by breach of Keo administrative, managerial, and technical safeguards. Therefore, Keo urges Users to take adequate precautions to protect Users' Personal Information as well, including never sharing their account credentials with anyone.

The collection of Personal Information will be limited to that which is necessary for the purposes identified by Keo in Section 6 (*How Keo Uses Personal Information*). Information will be collected in compliance with Applicable Laws.

## 5. CONSENT

Except where otherwise permitted or required by Applicable Laws, Keo will obtain Users' informed consent to collect and retain Users' Personal Information. Express consent may be obtained verbally, electronically or in writing. Implied consent may be obtained through Users' use of Keo Services, or when Users approach Keo to obtain information, inquire about or apply for products or services from Keo.

In certain circumstances, Personal Information can be collected, used, or disclosed without Users' knowledge and consent. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. When the Personal Information is being collected for the detection and prevention of fraud or for law enforcement, seeking Users' consent might defeat the purpose of collecting the information. Seeking consent may be impossible or inappropriate when there is an emergency threatening Users' life, health, or security, when Users are seriously ill, or mentally incapacitated. Moreover, Keo may provide Personal Information to its lawyers or agents to collect a debt, comply with a subpoena, warrant or other court order, government institution requesting the information upon lawful authority, or as may be otherwise permitted or required by Applicable Laws.

Users may withdraw consent to Keo's use of their Personal Information at any time, subject to legal or contractual restrictions and reasonable notice. Keo will inform Users of the implications of such withdrawal. In order to withdraw consent, Users must provide notice to Keo in writing by contacting the Privacy Officer using the contact information provided under Section 14 (*How to contact us*).

## 6. HOW KEO USES PERSONAL INFORMATION

Keo's primary purpose in collecting Personal Information is to provide Users with a safe, smooth, efficient, fun, and customized experience. Keo may use Users Personal Information, either directly or through a third party, in the following ways:

- To verify Users' identities and comply with due diligence processes required by applicable laws.
- To provide Users with the Keo Services and manage their accounts.
- To improve the Keo Website, the Workeo Payment App and the Keo Services for Users and to personalize their experience on such platforms.
- To carry out marketing activities and to recommend features and products to Users.
- To consult restrictive lists, sanction lists and/or databases of national or international organizations, related third countries, among others, with regard to or not, prevention, detection, monitoring and control of money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction.
- To contact Users.
- As otherwise required or permitted by Applicable Laws, to prevent fraud or criminal activity, to protect or enforce the rights of Keo and to safeguard the security of Users, Keo and others.

## 7. HOW KEO SHARES PERSONAL INFORMATION WITH OTHER PARTIES

Keo does not sell or share Users' Personal Information with third parties for promotional or marketing purposes. However, Keo may use analytics service providers to analyze how Users interact and engage with the Keo Services, so that Keo can learn and make enhancements to offer Users a better experience.

Keo may share Users' Personal Information with:

- Law enforcement, government officials, or other third parties as required or permitted by applicable law to prevent fraud or criminal activity, to protect or enforce the rights of Keo and to safeguard the security of Users, Keo and others.
- Controlling companies, affiliates, subsidiaries, and companies belonging to the same business group.
- Third party service providers that assist Keo in providing Keo Services to Users or who provide fraud detection or similar services on Keo's behalf. Keo's agreements with third-party service providers dictate, among other things, that such service providers only use Users' Personal Information in connection with the services they perform for us and not for any other reason.
- Other third parties with Users' consent or at Users' direction to do so.

The Keo Services incorporate a platform called Grapes, which is operated by 13370046 Canada Inc. The User authorizes Keo to disclose their Personal Information to 13370046 Canada Inc. to facilitate the functionality of the Grapes platform in conjunction with the Keo Services. Upon such disclosure, such Personal Information shall no longer be under the control of Keo and shall become under the control of 13370046 Canada Inc. and shall be treated by 13370046 Canada Inc. in accordance with its privacy policy. The User hereby consents to such disclosure and treatment.

Keo may process, store, and transfer Users' Personal Information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian Applicable Laws. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to Users' Personal Information through the laws of the foreign country. Whenever Keo engages a third-party service provider, we require that its privacy and security standards adhere to this Policy and Applicable Laws. Users are welcome to contact us to obtain further information about Keo's policies regarding third-party service providers outside of Canada in accordance with Section 14 (*How to Contact Us*).

The User authorizes Keo to make enquiries, whether directly or through third parties, that Keo considers necessary or desirable to verify the User's identity, comply with all applicable laws, or protect the User or Keo against fraud or other financial crime, including money laundering and the financing of terrorism, and to take such action that Keo reasonably deems necessary or desirable based on the results of such enquiries. When Keo carries out these enquiries, the User acknowledges and agrees that its Registration Data (as defined in the User Agreement between the User and Keo) may be disclosed to credit reference and fraud prevention or financial crime agencies and that these agencies may respond to Keo's enquiries in full. This is an identity check only and should have no adverse effect on the User's credit rating.

## 8. ACCURACY

Keo intends that Personal Information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used, including to minimize the possibility that inappropriate information may be used to make a decision about Users.

By law, Users have the right to request access to and to correct the Personal Information that we hold about them. Users have the ability to correct or change Users' Personal Information in Keo's records, such as Users' addresses and contact information, by updating such information in their Keo accounts. Users may change this information at any time and as often as necessary. If Users need assistance or have questions about changing, updating, or correcting information, Users can contact us as set out in Section 14 (*How to contact us*).



Keo will respond to Users' requests no later than thirty (30) days after the receipt of the request. Users will be informed in writing if a request cannot be met within this time limit.

## **9. HOW THE USERS CAN ACCESS, CHANGE OR DELETE THEIR PERSONAL INFORMATION**

If Users do not wish that their Personal Information be used by Keo, Users may contact Keo as set out in Section 14 (*How to contact us*), to request the removal, destruction or elimination of any of their Personal Information. Please note that if Users withdraw their consent, we may not be able to provide them with certain or any Keo Services.

Upon request, Users shall be informed of the existence, use, and disclosure of their Personal Information and shall be given access to that information to the extent required by Applicable Laws. Keo will make the requested Personal Information available in a form that is generally understandable and will explain any abbreviations or codes. The Users shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## **10. HOW DOES KEO KEEP USERS' PERSONAL INFORMATION SECURE**

Keo follows generally accepted industry standards to protect Users' Personal Information. However, no method of internet transmission or electronic storage is 100% secure. Therefore, while Keo strives to use commercially acceptable means to protect Users' Personal Information, Keo cannot guarantee its absolute security.

Keo protects Personal Information against loss, theft, unauthorized access, disclosure, copying, use, or modification using security safeguards appropriate to the sensitivity of the information. The nature of the safeguards varies depending on the sensitivity of the information that has been collected, the amount, distribution and format of the information, and the method of storage.

These are some of the methods that Keo uses to protect Users' Personal Information:

- Physical measures, such as locked filing cabinets and restricted access to offices.
- Organizational measures, such as security clearances and limiting access on a "need to know" basis.
- Technological measures, such as the use of passwords and encryption.

Keo employees are made aware of the importance of maintaining the confidentiality of Personal Information. Keo employees are governed by a confidentiality clause prohibiting disclosure or use of any confidential or Personal Information for any purposes other than the stated business purposes.

## **11. DATA RETENTION**

Keo keeps all Personal Information (i) as long as necessary to fulfill the purposes set out in this Policy, (ii) as long as Keo require to do so for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal regulatory obligations, or (iii) as long as otherwise permitted or required by Applicable Laws. Retention periods will be determined considering the type of information that is collected and the purpose for which it was collected, bearing in mind the requirements applicable to the situation and the need to delete outdated, unused information at the earliest reasonable time.

When deleting Personal Information, Keo will take measures to render such Personal Information irrecoverable or irreproducible, and the electronic files which contain Personal Information will be permanently deleted. Under some circumstances, Keo may anonymize Users' Personal Information so that it can no longer be associated with them. Keo reserves the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to Users or their consent.

## **12. PROTECTION OF MINORS**

Keo does not solicit or target persons under 18 years. Keo does not knowingly collect any information relating to children under the age of 18 years. If Keo discovers that a child under 18 years has provided Personal Information, or Keo have otherwise come into possession of Personal Information of a child, Keo will promptly delete such Personal Information from its systems.

## **13. CHANGES TO KEO PRIVACY AND DATA PROTECTION POLICY**

Keo is always improving. As Keo Services evolve, Keo may occasionally update this Policy. If Keo modifies this Policy, it will post the revised Policy to the Website. If Keo make material changes in the way Keo uses Personal Information, Keo will notify Users by posting an announcement on the Keo Website or by sending Users an e-mail. It is Users' responsibility to periodically review this Policy. Users are bound by any changes to this Policy by continuing to use the Keo Services after such changes have been first posted. The date of the most recent update to this Policy is located at the top of this Policy.

## **14. HOW TO CONTACT US**

If Users have questions or concerns regarding this Policy, or any feedback pertaining to Users' privacy and the Keo Services that Users would like us to consider, please contact Keo's Privacy Officer via email at [privacyprotection@keoworld.com](mailto:privacyprotection@keoworld.com).