

## KIPSWIRL SPLINT INC. PRIVACY POLICY

At **Kipswirl Split Inc.** (“**KIPSWIRL**”), we are committed to maintaining the privacy, accuracy and security of your personal information. We have developed this website privacy policy to describe our privacy policies and practices and to provide you with information about how we collect, use and disclose the personal information of the individuals who visit this website (the “**Site**”) or use the services we offer, including any applications such as the application known as “Sophia” (collectively, the “**Services**”).

Please take a minute to read this policy so that you understand how we treat your personal information. If you are unsure *if* or *how* this privacy policy applies to you, please contact us at [hello@sophiaandme.com](mailto:hello@sophiaandme.com) to request more information.

### ***What is Personal Information?***

For the purposes of this privacy policy, we consider **personal information** to be any information that describes you as an identifiable individual, other than your business title or business contact information when used or disclosed for the purpose of business communications.

For example, personal information includes your name, age, e-mail address, preferences (such as asking to receive our emails or special offers), usage habits (including how and when you use the Site and the Services) and, where applicable, payment details.

### ***What Personal Information Do We Collect?***

You can visit the Site without directly telling us who you are. However, **it is important to note** that our web server collects information related to your visit to the Site or the Services, including the IP address and domain used to access the Site or the Services, the type and version of your browser, the website you came from to access the Site or the Services, the page you entered and exited at, any pages that are viewed by that IP address and the country from which you accessed the site.

We use this information to monitor the performance of the Site and the Services (such as number of visits, average time spent per page, number of page views), to determine interest in the Site and Services, and for business purposes, such as working to continually upgrade the Site and Services to meet consumer needs.

In addition, we may collect the personal information that you submit to us, such as your name, address and any other contact or other information that you choose to provide by:

- registering as a member/subscriber on the Site or for the Services;
- using your membership or subscriber account to access the Site or the Services;
- contributing an article, photo, video, comment, data, or preferences to the Site or the Services;
- corresponding with us via e-mail using the hyperlinks created for that purpose; or
- through other communication methods.

Your personal information may also be collected when you participate in surveys or polls, or respond to special offers, give-aways or promotions on the Site. In addition, the Site may store your electronic chat and other communications, which are necessarily incidental to the transmission and delivery of those communications and to prevent misuse of our Site and Services.

Other, more fulsome information, such as your account status and choice of Services and preferences is created and maintained by the Site and through our third party providers (each with their own privacy policies) in the normal course of providing Services to our members/subscribers and other users. This includes the tracking of time spent within the Services.

This information is collected and aggregated with the information of other users in order to gain an understanding of the usage habits and preferences of our members/subscribers and to assist us with the selection and adjustment of future content and features for the Services.

Aggregated and anonymized information may also be shared with third parties for a variety of purposes, including without limitation in order to permit us to improve the Site or Services, to engage in marketing or similar activities, or otherwise for business purposes. This information is aggregated across all members/subscribers in order to protect the usage habits of individual members/subscribers.

### ***Why Do We Collect, Use, and Disclose Personal Information?***

We collect personal information from you for a variety of purposes, including to:

- establish, maintain and manage our relationship with you;
- enforce our Terms of Use, including investigating user conduct and, in some cases, banning a user temporarily or permanently from the Site or Services if that user engages in inappropriate conduct;
- review and improve the products and services that we provide to you;
- comply with your requests;
- notify you of products or services in which you may be interested;
- protect us against error, fraud, theft and damage to our goods and property; and
- comply with applicable law or regulatory requirements.

Additionally, we collect personal information for specific purposes that we may advise you of at or before the time that we collect such personal information.

We may also use your contact information to provide you with notification regarding the Site or Services, such as any future amendments to this policy, and may disclose such information in response to law enforcement agencies or other public agencies, or if we feel that such disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety, protect the security or integrity of the Site and Services, or enable us to take precautions against liability.

Your personal information may be shared with our employees, contractors, consultants, affiliates and other third parties who require such information to assist us with establishing, maintaining and managing our relationship with you, notifying you of products or services in which you may be interested, or developing, operating and maintaining the Site and Services. In addition, your personal information may be disclosed or transferred to another party in the event of a change in ownership of, or a grant of a security interest in, all or a part of KIPSWIRL.

For example, our secure billing service provider may provide certain information technology and data processing services to us from time to time so that we may operate our business. As a result, your personal information may be collected, used, processed, stored or disclosed in the United States of America, Canada and any other relevant locations.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements (for example, in response to a court order or a subpoena);
- to protect the rights and property of KIPSWIRL;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent.

You acknowledge and agree that access to and use of this Site and the Services is provided via the Internet and that your information, including personal information, may be transferred across national borders and stored or processed in any country in the world. **We may also collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.**

### *We may send you E-mail*

From time to time we may e-mail important information to you regarding the Site or the Services (such as a change to our service offering).

In addition, when you request information from us or become a member/subscriber of the Site or Services, we may use the e-mail address that you provide to send you information about offers on products and services that we believe may be of interest to you. If you do not wish to receive such e-mails, you may opt out of receiving emails by simply clicking on the unsubscribe link embedded within any one of the emails sent by us.

### *A Few Words about On-line Safety*

It is important to remember that while we take steps to protect your personal information and the integrity of the Services that you sign up to enjoy, no security measures are perfect or impenetrable. In addition, whenever you voluntarily disclose personal information on message boards, in e-mails, or in chat or comment areas on the Site or through the Services, that information can be collected and used by others. If you post personal information in public places, others may send you unsolicited e-mail messages or attempt to contact you in other ways. KIPSWIRL is not responsible for the collection, usage or disclosure of your personal information by third parties to whom you voluntarily disclose such information.

### **Always be cautious about the information you provide or store online.**

### *How Do We Use Cookies?*

When you visit the Site or Services, we may place a “cookie” on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows the Site to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the Site or Services so that we can better understand your use of the Site and Services and customize and tailor it to better meet your needs. For example, our cookies help us to learn about the usage of the Site and Services by helping us to track how many visitors we have, how often they visit various sections of the Site and Services, and their geographic location.

Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (1) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (2) automatically prevent the placing

of a cookie on your hard drive. It should be noted that if cookies are not accepted, you will **not** be able to access a number of web pages found on the website.

### ***Your Consent is Important to Us***

By using the Site or Services, we assume that you consent to the collection, use and disclosure of your personal information as explained in this privacy policy.

In addition, you may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting us at [hello@sophiaandme.com](mailto:hello@sophiaandme.com). In some circumstances, a change in or withdrawal of consent may severely limit or even prevent our ability to provide products or services to you. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to [hello@sophiaandme.com](mailto:hello@sophiaandme.com).

### ***How is Your Personal Information Protected?***

KIPSWIRL endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure.

The security of your personal information is important to us. Please immediately advise us at [hello@sophiaandme.com](mailto:hello@sophiaandme.com) of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while this Site and the Services strive to protect your personal information, we cannot guarantee the confidentiality or security of any information you transmit to us, and you do so at your own risk.

### ***What about Third Party Advertisements or Links to other Websites?***

*You should be aware that companies that advertise on our Site may use their own cookies. This Policy does not cover how these companies use their cookies.*

Our Site and Services may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. KIPSWIRL is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

### ***Updating Your Personal Information***

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances, we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

### ***Access to Your Personal Information***

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact us at [hello@sophiaandme.com](mailto:hello@sophiaandme.com). Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact us at [hello@sophiaandme.com](mailto:hello@sophiaandme.com).

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

### ***Inquiries or Concerns?***

If you have any questions or concerns about our privacy policies, please send an e-mail with your questions or comments to [hello@sophiaandme.com](mailto:hello@sophiaandme.com) or notify us by mail at:

4500 Bankers Hall East  
855 – 2<sup>nd</sup> Street SW  
Calgary, AB  
T2P 4K7

### ***Application and Interpretation of this Privacy Policy***

It is our policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This privacy policy has a limited scope and application. Consequently, the rights and obligations contained in this privacy policy may not be available to all individuals or in all jurisdictions.

Any interpretation associated with this privacy policy will be made by our Board of Directors. This privacy policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This privacy policy does not create or confer upon any individual any rights, or impose upon KIPSWIRL any rights or obligations outside of, or in addition to, any rights or obligations imposed by applicable laws. Should there be, in a specific case, any inconsistency between this privacy policy and such laws, this privacy policy shall be interpreted, in respect of that case, to give effect to, and comply with, such laws.

### ***Modifications to this Privacy Policy***

From time to time, we may make changes to this privacy policy to reflect changes in our legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this privacy policy on the Site and we encourage you to refer back to it on a regular basis. This privacy policy was last updated on **April 27, 2019**.