

## Privacy Policy

Last modified: **August 6, 2021**

Mentum Group Inc. 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 [mentumqr.com](https://mentumqr.com) and any of its sub-domains (our "**Website**"), use our application ("**App**"), buy products through us, use our services, sign up for an account with us (an "**Account**"), use our software platform (the "**Platform**") (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, the Terms of Service for our Platform and App 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 information about how you use our Services and how you use and interact with our Website. "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 or place an order for services with us you will give us information like your email address, first and last 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, communication means in the Services, and other electronic messages between you and us (collectively, "**Electronic Messages**") or by phone or mail.
- 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, information you provide in the App to use its functions and features, information you provide in the Platform to use its functions and features, 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. **Payment processing information.** If you have made a purchase through us, or if you make a financial transaction using our Services, we and any third-party payment processors we use will collect information about the purchase or transaction. This includes billing details, credit card information, account, and authentication information.
  - g. **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.
  - h. **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 process payments.** We use your personal information to process payments through our Website and Services.
- c. **To communicate with you and verify your identity.** We use your personal information to communicate with you, including to send you emails, SMS messages, and other communications about the Services and your relationship with us. We also may use your personal information to verify your identity.
- d. **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.
- e. **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.
- f. **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.
- g. **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.
- h. **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.
- i. **To manage our third-party relationships.** We use your personal information to manage our vendor, service provider, and partner relationships.
- j. **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.

- k. **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.
  - l. **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, such as providing Services to you, 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 use your personal information to deliver our Services to you through our Platform.
- 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 create and use performance reporting and analytics to improve our Website and Services.
  - iii. 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.
  - iv. 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, to provide you with troubleshooting and support services, and to answer your questions about our business.
  - v. To share your personal information with other companies that help us to provide and improve the Website and Services.
  - vi. 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.

- vii. To accomplish the other business and commercial purposes about which we may notify you from time to time, including the purposes outlined in this Privacy Policy.

## 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 and subsidiaries.** We share personal information with our affiliates and subsidiaries 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, or for other purposes that we identify at the time we collect the personal information from you.
- 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, to complete purchase and order requests, or to 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. **Process payments.** We transmit your personal information via an encrypted connection to our payment processor.
- e. **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.
- f. **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.
- g. **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.

- h. **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.
- i. **Information we collect and share with or sell to others for their own purposes.** Our business includes collecting information and data about people and companies that use our Website and Services and sharing that information with other organizations so that they can use it for their own purposes. For example, we may share insights, metrics, and information that other organizations, people, and companies may find useful as follows: to help promote or sell its own products or services; to provide market insights and economic data; or for other purposes we disclose to you at the time we collect the information. We may share or sell such information with others as part of our business and in connection with our Services. We only provide aggregated, non-personal, anonymized data unless we have your permission in advance or as otherwise disclosed at the time the information is collected.

## 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 [support@mentumqr.com](mailto:support@mentumqr.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 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. If you wish to withdraw consent, please contact our Privacy Officer, or follow the instructions on opting-out of collection and use of your personal information through the Service or Account. Please note that if you withdraw consent, certain features of the Service or your Account may not have full functionality because certain features rely on your personal information to work as intended.
- f. **Exercising your rights.** If you wish to exercise these rights, please contact us. If you are unhappy with the response that you receive from us, we hope that you would contact us to resolve the issue. But you also have the right to lodge a complaint with the relevant data protection authority in your jurisdiction at any time.
- g. **Legitimate purposes.** If you are in the European Union, please note that we are generally controlling or processing your information to fulfill contracts we might have with you or otherwise to pursue our legitimate business interests listed in this Privacy Policy. For reference, please refer to section 4(d) entitled, "When do we use your information? – Legitimate interests." When we control or process personal information to pursue these legitimate interests, we do so where we believe the nature of the activity, the information, and the technical and organizational measures employed to protect that information can help mitigate the risks to the data subject.

## 7. **California Residents.**

This section is only applicable to you if you are a resident of the state of California in the United States ("**California Residents**") and only applies to personal information for which we are a "business" and you a "consumer" (as defined in the California Consumer Privacy Act, or "**CCPA**"). This section applies to personal information we collect from California Residents on or through our Website or Services and through other means (such as information collected offline or in person).

- a. **Categories.** California law requires us to disclose certain information regarding the categories of personal information we collect. The following is a list of all categories of personal information which we collect, or have collected, from California Residents in the twelve months prior to the effective date of this Privacy Policy.
  - i. Personal information described throughout this Privacy Policy, including information that identifies, relates to, describes, or is capable of being associated with you.
  - ii. Identifiers, such as your name, username or alias, postal address, unique personal identifiers (such as your account number or other online identifier), Internet Protocol (IP) address and other electronic network information, email address, and other similar identifiers.
  - iii. Customer records information, such as signatures, e-signatures, passwords, and other sign-on details, and any similar or related customer records information we identify at the time we collect it from you and which you choose to give to us.

- iv. Commercial information, such as records of products you have purchased or considered, or other purchasing or consuming histories and tendencies.
  - v. Biometric information, such as fingerprints or facial recognition for login purposes, and other biometric data we identify at the time of collection.
  - vi. Internet or other electronic network activity information, such as your browsing history, search history, and your interaction with the Website or Services.
  - vii. Geolocation information.
  - viii. Audio, visual, thermal, olfactory, or similar sensory information.
  - ix. Professional or employment-related information, such as your occupation, education, employment, and similar information.
  - x. Inferences as we describe in section 2 above entitled, "What personal information do we collect about you and how do we collect it?"
- b. **Sources, purposes, and third parties.** California law requires us to disclose the categories of sources of the information we collect about you, the purposes for collecting, sharing, and disclosing that information, and the categories of third parties with whom we may share your information. For each of the categories we listed above, the sources of the information are described in section 2 entitled, "What personal information do we collect about you and how do we collect it?". The purposes for collecting, sharing, and disclosing the information are described in section 3 above entitled, "How do we use your information?" The categories of third parties with whom we share your personal information are described in section 5 above entitled, "How do we share your personal information?"
- c. **Financial incentives.** In some circumstances, we may provide financial incentives as allowed by the CCPA for collecting and using your personal information. Any such incentives will be described to you at the time of collection or otherwise communicated to you before the incentives become applicable.
- d. **Your requests.** Subject to certain exceptions and restrictions, the CCPA provides California Residents the right to submit requests to a business which has collected their personal information: (i) to provide them with access to the specific pieces and categories of personal information collected by the business about such California Resident, the categories of sources for such information, the business or commercial purposes for collecting such information (including any sale of personal information), and the categories of third parties with which such information was shared; and (ii) to delete such personal information (each, a "**California Request**"). We need certain types of information so that we can provide our Services to you. If you ask us to delete some or all of your information, you may no longer be able to access or use the Services. If you are a California Resident, please follow the instructions in the "Your rights and choices" section above to submit California Requests and please make sure you note that you are a California Resident when you do so. California Residents may designate an authorized agent to make California Requests on their behalf. In order to designate an authorized agent to make a California Request on your behalf, you must provide a valid power of attorney, the requester's valid government issued identification, and the authorized agent's valid government issued identification. We may use any relevant categories of



personal information we outline in this section to verify your identity when you make a California Request.

- e. **We sell your personal information with your consent.** When we have received your consent, we sell your personal information as that term is defined in the CCPA. We may have sold personal information to third parties for a business or commercial purpose consistent with the categories, business and commercial purposes, sources and third parties set out in subsection (a) above.
- f. **We do not discriminate against you.** You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. We do not discriminate against California Residents for exercising their rights.

8. **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, in-App communication functions, 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.

9. **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, credit card processors, 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.

10. **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.

**11. 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, to improve our Website and Services.

**12. Automated decision-making and your personal information.**

We 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.

**13. 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.

**14. 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 [[support@mentumqr.com](mailto:support@mentumqr.com)].

**15. 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.