



Eastbay Technologies Inc. Privacy Policy

Eastbay Technologies Inc. respects the privacy rights of our clients and personnel and is committed to protecting all personal information of our clients and personnel that comes into our possession or control in connection with operating our business. This Privacy Policy applies to all subsidiaries and associated companies of Eastbay Technologies Inc. (collectively referred to in this Privacy Policy as “Eastbay”, “we”, “our” or “us”).

Certain of the practices discussed in this Privacy Policy reflect requirements set out in Canadian federal and/or provincial privacy legislation. Eastbay’s policy is to at all times adhere to the requirements of applicable law relating to personal information of our clients and personnel.

For purposes of this Privacy Policy, the term “personal information” means information about an identifiable individual, as more specifically defined by applicable privacy legislation.

Eastbay is accountable for all personal information in our possession or control. This includes any personal information that we receive directly, for example, from individual clients and Eastbay personnel, as well as any personal information that we may receive indirectly, for example, through corporate and government clients. We have established policies and procedures aimed at protecting the personal information of our clients and Eastbay personnel. We have appointed a Privacy Officer to oversee privacy issues for Eastbay. We have also educated Eastbay personnel about our Privacy Policy and their role in protecting the personal information of our clients and personnel. If you have questions about our privacy practices, you are free to contact our Privacy Officer at privacy@eastbay.ca.

In most instances, Eastbay will collect, use or disclose personal information about clients only for the purpose of providing professional services, to comply with applicable laws and regulations, and/or for the purpose of obtaining technological, administrative, analytical and clerical services or support. Eastbay will limit the collection of personal information to that which is reasonably required to provide our services and to operate our business.

Client personal information may also be collected, used or disclosed internally and to third party providers of services to Eastbay for the purpose of ensuring compliance with Eastbay policies and processes, in the performance of quality reviews, or in order to allow us to offer services or products that may be of interest to clients.

Eastbay may also collect, use or disclose personal information, internally and to third party service providers to Eastbay, about clients and prospective clients for marketing and business development and relationship purposes, which may include (i) developing, maintaining, monitoring and generating insights into our relationship with clients, (ii) conducting research to develop, evaluate, target and improve our services and offerings, and (iii) communicating products, services, offers, news and information updates or invitations to Eastbay hosted and sponsored events that may be of interest to clients. Clients can withdraw consent to

the use and disclosure of personal information for marketing purposes by contacting or our Privacy Officer at privacy@eastbay.ca.

Eastbay may also aggregate personal information, including with information from other sources, for the purpose of improving quality and service, marketing, business development, and for use in presentations to clients and non-clients, in a form where such information is sufficiently de-identified so as not to be attributable to any individual or organization.

Eastbay collects, uses, and discloses personal information about Eastbay personnel in order to pay such persons, to comply with laws and regulations, to provide such persons with benefits, to administer performance management tools, to administer, manage, enforce and monitor compliance with Eastbay programs, policies and employee relations, and generally to establish, manage or terminate the employment relationship.

Eastbay may also collect, use and disclose Eastbay employee and contractor resumes, curriculum vitae and professional profiles in order to determine suitability for client engagements and respond to RFPs, for client service delivery, business development and engagement related purposes, as well as marketing and communication purposes and to evaluate the effectiveness of our service delivery, policies, programs, and processes. Eastbay may also collect, use, and disclose personal information about individuals seeking employment or engagements with Eastbay for the purpose of evaluating their application, to communicate with them regarding their employment or service, and for the purpose of evaluating or monitoring Eastbay policies, programs and practices. Forms and applications used to provide human resources-related services to Eastbay personnel will describe the purposes for which such personal information is required and to whom it will be disclosed. In addition, certain Eastbay policies or program documents may provide information about how personal information relating to employees may be collected, used and disclosed. Employment candidates will also be advised of the purposes for which their personal information is being collected, used and disclosed. Eastbay retains personal information about current and past Eastbay personnel in accordance with employment laws and standards and Canadian federal and provincial privacy legislation. Eastbay will destroy human resources and other files containing Eastbay employee personal information when such information is no longer reasonably required for legal, administrative, audit or regulatory purposes.

Eastbay may also collect, use, or disclose Eastbay client and employee personal information in the course of investigating, negotiating or completing a sale, equity or debt financing or other business transaction involving all or any part of our business, whether in the ordinary course of business or otherwise.

At or before the time that Eastbay collects personal information, we will inform Eastbay personnel of the reasons why we require such information, what use will be made of it, and with whom it may be shared, except where we are permitted or required by law to collect, use, or disclose personal information without providing such notice.

Eastbay may collect personal information about clients and Eastbay personnel for the above purposes directly or indirectly from third party sources (including publicly available sources, suppliers, vendors, previous employers, public websites, educational institutions, and social media) as permitted by applicable law.

When you visit Eastbay websites, we may use cookies and other marketing automation tools for the purposes of functionality of the website. A cookie is a small text file containing a string of alphanumeric characters that a website stores on your device that we can later retrieve. The information that Eastbay collects through cookies, which may be defined as personal information, includes: the web address you came from or are going to, device model, operating system, the type of web browser, internet service

provider/mobile carrier, unique identifiers, mobile network carrier, the duration of the visit, time zone and IP address, and additional information provided by the browser or device. You can manage and control cookies through your browser, including removing cookies by deleting them from your 'browser history' (cache) when you leave the site. Eastbay uses Strictly Necessary Cookies in order to enable users to move around the website and use its features, such as accessing secure areas of the website. These cookies must be enabled or the site will not function, and cannot be blocked. Eastbay uses Non-Essential Cookies gather data to enhance website performance, remember user selections and deliver content relevant to your interests, limit the number of times you see certain marketing materials, as well as help measure the effectiveness of marketing materials. You can manage your consent for Non-Essential Cookies by using the cookie banner, or by updating your browser's settings (often found in your browser's Tools or Preferences menu) to not accept cookies.

Eastbay will collect, use or disclose personal information with consent except where collection, use or disclosure without consent is permitted or required by law. The terms and conditions of every Eastbay professional services engagement are documented in writing, which may include Eastbay's standard terms and conditions, as applicable. By entering in a services agreement with Eastbay, the client is providing its consent to the collection, use and disclosure of personal information as described herein and in the agreement and/or applicable terms and conditions. If a client provides us with personal information relating to a third party, by engaging Eastbay to provide professional services, the client represents and warrants to Eastbay that they have obtained consent from the third party to allow us to collect, use and disclose such third party personal information disclosed to us as described in this privacy policy, the engagement agreement and standard terms, as applicable.

Eastbay will keep personal information only as long as necessary to accomplish these purposes and in accordance with our data retention and destruction policies as in effect from time to time.

If Eastbay intends to use or disclose personal information for any purpose not previously identified, we will obtain prior consent unless we are permitted or required by law to use or disclose such personal information without consent.

Eastbay clients always have the option not to provide consent to the collection, use and disclosure of their personal information, or to withdraw their consent, subject to contractual and legal restrictions and reasonable notice. Where a client chooses not to provide Eastbay with permission to collect, use or disclose their personal information, Eastbay may not be able to provide, or continue to provide, the client with services.

Where an employee or candidate for employment chooses not to provide us with permission to collect, use or disclose their personal information, we may not be able to employ them, continue to employ them or to provide them with benefits.

Eastbay protects personal information by using physically secure facilities, industry standard security tools and practices, and clearly defined internal policies and practices. Security measures are in place to prevent the loss, misuse and alteration of the personal information under our control. Personal information is stored in secure environments that are not available to the public (e.g., restricted access premises, locked rooms and filing cabinets). To prevent unauthorized electronic access to personal information, any information that is stored in electronic form is protected in a secure electronic and physical environment through access controls, encryption where appropriate and other industry-standard safeguards.

In order to provide clients with a professional level of service, Eastbay personnel with appropriate benefits, and manage and operate the Eastbay business, the personal information that we collect must be accurate, complete and current. From time to time, clients and Eastbay personnel may be asked to update their

personal information. Clients and Eastbay personnel are encouraged to advise Eastbay of any changes to their respective personal information.

We are responsible for all personal information transferred to third party service providers. We require third party service providers to respect the confidentiality of personal information and all legal requirements under applicable Canadian federal and provincial privacy legislation, and to agree to contractual requirements that are consistent with this Privacy Policy. These third-party service providers are prohibited from using personal information except for the specific purpose(s) for which we supply it to them.

In some circumstances, personal information may be collected, used, disclosed or stored outside of Canada, including but not limited to in the U.S., EU and Asia, by Eastbay or a third party provider of services to Eastbay, and such personal information may be subject to disclosure in accordance with the laws such jurisdiction in which the information is collected, used, disclosed or stored. These laws may not provide the same level of protection as Canadian privacy laws. Eastbay uses contractual and other reasonable safeguards to protect such information.

At your request, in accordance with applicable privacy laws, Eastbay will advise you of what personal information we have in our possession or control about you, what it is being used for, and to whom and why it has been disclosed.

Clients have the right to review and obtain a copy of their personal information on record with Eastbay. Clients may request such information by contacting their Eastbay representative.

Eastbay personnel have the right to review and obtain copies of their personal information on record by contacting Human Resources.

The right to access personal information is subject to certain legal restrictions and we will take reasonable steps to verify your identity before providing access.

In most instances, you will receive a response to your access request within 30 days.

Eastbay will respond to all privacy-related complaints and will take reasonable steps to investigate and resolve any concerns.

If you have any questions or concerns relating this Privacy Policy or Eastbay's compliance, you should forward your concerns in writing to Eastbay's Privacy Officer at privacy@eastbay.ca. The Privacy Officer will ensure that an investigation of all complaints has been undertaken and will report their findings to you, in most instances within 30 days.