

Validere Privacy Policy

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1. Introduction

Welcome to www.validere.com (the “**Website**”). This privacy policy (the “**Privacy Policy**”) describes how Validere Technologies Ltd. (“**Validere**”, “**we**”, or “**us**”) collects, uses, discloses, transfers, retains, and safeguards personal information through the Website and in connection with our software products and services (collectively with the Website, the “**Services**”). By accessing and/or using the Services, you agree to the collection, use, disclosure, processing, and retention of your Personal Information as described in this Privacy Policy.

We may make changes to our Privacy Policy from time to time. When we do so, we will post the revised policy on our Website and amend the effective date at the top of the policy. We encourage you to check back on our Website for the latest information about our Privacy Policy and practices. If we make significant changes to our Privacy Policy, we will take additional measures to bring these to your attention. Following our posting of any changes to this Privacy Policy, your continued use of the Services signifies your consent to the revised terms of this Privacy Policy.

2. Types of Personal Information We Collect

For the purposes of this policy, “**Personal Information**” is any information about an identifiable individual, including any information that, alone or in combination with other information, could be used to identify an individual. Personal Information does not include aggregated information, or any Personal Information that has been de-identified through the removal of potentially identifying

details, such that the data may not be identified with a particular individual. Personal Information also does not include business contact information, such as your work email address or telephone number.

We collect Personal Information that you share with us directly or provide in connection with the Services. The types of Personal Information that we collect are as follows:

- **Account Information.** When you create or reconfigure a Validere account, we collect your name, email address, and other contact information that you provide to us. Registration for a Validere account also requires your birth date or identifying business number. You must be at least 18 years old to create a Validere account, and we will not knowingly collect information from persons under 18 years of age.
- **User-Submitted Information.** We collect Personal Information that you provide to us directly in connection with your use of our Services, such as information you provide via email, telephone, online forms, support requests, or any other means of communication.
- **Usage Data.** When you access the Services using a web browser or other application, we may collect your IP address and non-personal usage information such as your browser type and the webpages you visit while using the Services. When you use a mobile device like a tablet or phone to access our Services, we may also collect device identifiers. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to your device. As you use the Services, we may also collect non-personal information that is anonymous and aggregated and cannot be attributed back to you. For example, we use automated devices and applications, such as [Google Analytics](#) (to opt out, click [here](#)) to evaluate usage of our Services. We use these tools to obtain aggregated statistical information about the use of our Services, and to help us improve our services, performance, and user experiences. These analytics providers may use cookies and other technologies to perform their services and may combine the information that they collect through the Services with other information that they have collected. This Privacy Policy does not cover the collection, use, and disclosure of tracking data collected by third party analytics providers; for further information please see the relevant provider's privacy policy.

Other than some key information which we require to provide our Services, most of the Personal Information that you provide to us is optional. If you choose to not disclose certain Personal Information to us, that may mean that you will not be able to access certain features of the Services. For example, you must provide your name and email address to create a Validere account.

We rely on you to ensure that the Personal Information you provide to us is accurate, complete, and up-to-date. You may make changes or corrections to your Personal Information at any time. If you would like to review or update your Personal Information, please contact **our Privacy Officer** using the contact information provided below.

3. How We Use Your Personal Information

Validere generally collects, uses, discloses, processes, and retains your Personal Information to provide the Services and operate its business, including for the following purposes:

- to establish and maintain a commercial relationship with you;
- to establish your identity within the context of your oil testing operations;

- to develop and test new products and features;
- to provide you with support and ongoing customer service;
- to help you efficiently access and use our Services (for example, to remember information so you will not have to re-enter it during your visit or the next time you access the Services);
- to provide, improve, test, and monitor the effectiveness of the Services;
- to process payments;
- to meet legal and regulatory requirements; and
- for such other purposes consistent with these objectives.

In general, we may also use your Personal Information to ensure compliance with our policies and terms, to protect our property and business interests and the interests of our customers, and to comply with applicable legal and regulatory requirements.

We or our service providers may use your Personal Information to create aggregate, de-identified data that we may use or disclose for any purpose, in our sole discretion. We may use your feedback, comments, questions, and engagement to understand and analyze the interests, needs, and preferences of customers and users, to improve our Services, and to tailor the Services to you. As noted below, we may also use cookies to improve our Services and collect statistical information about how our Services are being used.

4. Disclosure of Personal Information

Except as specified in this Privacy Policy, we will not sell or lease your Personal Information to any third party marketers, or otherwise provide your Personal Information to third parties for their own use. We may share or disclose your Personal Information to third parties in the following circumstances:

- with your consent;
- where we believe, upon reasonable grounds, that disclosure is necessary to protect the rights, privacy, safety, or property of an identifiable person or group;
- where necessary to establish or collect monies owing to Validere;
- where necessary to permit Validere to pursue available remedies or limit any damages that Validere may ascertain;
- where Validere believes, upon reasonable grounds, that a breach of an agreement or contravention of law has been, or is about to be, committed and that it is reasonable to expect that disclosure with the knowledge or consent of the individual would compromise the investigation;
- where Validere believes, upon reasonable grounds, that fraud is likely to be committed and it is necessary to use the Personal Information to detect, suppress, or prevent fraud; and
- where it is necessary to assess, process, or settle an insurance claim.

We may provide your Personal Information to a third party where reasonably required in the context of a sale, merger or amalgamation involving all or part of our business. In any such case, the recipient parties will be contractually required to keep the information confidential and use it only for the purposes of the transaction, or proposed transaction, in question.

We and our service providers may disclose your Personal Information in response to a search warrant or other legally valid inquiry or order, or as otherwise required or permitted by applicable law, including the disclosure of Personal Information where necessary for the establishment, exercise, or defense of legal claims, or to prevent actual or suspected loss or harm to persons or property.

5. Processing of Personal Information by Third Parties

Except as specified in this Privacy Policy, we do not share your Personal Information with third parties. We may share your information with our affiliates or with service providers who help us run our operations, provide the Services, or fulfill your requests. We may also share your Personal Information with third party contractors and service providers that we have engaged to provide us with services or to perform services on our behalf, based on our instructions, such as data processing and storage companies or individuals and organizations that provide professional and/or administrative services to us.

6. Cross-border Data Transfer

We and some third-party service providers that we may engage may store or process your Personal Information in the United States or other jurisdictions other than Canada, where it may be subject to the laws of the jurisdiction in which it is stored. By using the Services, you expressly agree that your Personal Information may be transferred to the United States.

7. Cookies and Related Technologies

We use “cookie” technology to provide you with a better user experience as you use the Website and Services. A cookie is a tiny element of data that our Website can send to your browser, which is stored on your device and records your preferences and your use of the Website so we can recognize you when you return. We use cookies to help us understand how you use our Services so we can make our Services more relevant to you. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies in connection with our Website or Services, you may not be able to take full advantage of all of the features of our Website and/or Services.

8. How We Safeguard Personal Information

We endeavor to maintain appropriate physical, procedural, and technical security with respect to our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of your Personal Information. This also applies to the disposal or destruction of Personal Information. We further protect your Personal Information by restricting its access to those employees who need to have knowledge of that information in order for us to provide our Services, as determined by the management of the Corporation.

9. Retention of Personal Information

We retain your Personal Information only where required to fulfil the purposes set out in this Privacy Policy, and for no longer than necessary to fulfill those purposes, including retention for a reasonable period of time to facilitate your potential restart of services with us, or as otherwise permitted or required by law. When we no longer have a legitimate need to retain your Personal Information, we will securely destroy or irrevocably erase it.

10. Your Choices & Access to Your Personal Information

We value your choices when it comes to your Personal Information. You choose how much information to share with us through the registration process and through your use of the Services. You generally have the right to withdraw your consent to any further collection, use, or disclosure of any elements of your Personal Information, subject to legal and contractual requirements; however, such a withdrawal may reduce your ability to take full advantage of our Services.

If you are a registered user of our Services, we provide you with tools and resources to access or modify the Personal Information you provided to us and associated with your account. You also have the right to access and request correction or updating of your Personal Information, subject to limited exceptions prescribed by applicable laws. To guard against fraudulent requests, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or modifying any Personal Information.

If you would like to discuss your privacy choices, including your ability to opt-out of providing certain information, please contact us using the contact information provided below.

11. How to Contact Us

If you have questions or concerns regarding the Privacy Policy or our privacy practices, please contact our **Privacy Officer** by email at privacy@validere.com or by mail at the following address:

Validere Technologies Inc.
1300 Yonge St, Suite 701
Toronto, Ontario
M4T 1X3
Canada