

Centrecore Ai - Privacy Policy

Last Updated: July 22, 2024.

Centrecore Ai Inc. (“**Centrecore**”, “**us**”, “**we**”, “**our**”), is committed to protecting your privacy. We offer a cybersecurity platform for end-point protection across devices, users, and cloud applications, and other related services (“**Solution**”), in addition to our website located at <https://centrecore.ai/> (“**Website**”) and its subdomains, which contains information about us, our technology, and information concerning our Solution. The Website together with the Solution and related services, except if specifically designated otherwise, shall be referred to herein as the “**Services**”.

This privacy policy (“**Privacy Policy**”) describes how we collect, store, use, and distribute your information, including personally identifiable information about an individual (“**Personal Information**”), via the Services. Please read the following carefully to understand our practices regarding Personal Information about users who access and browse the Website and Personal Information about or shared with us by Centrecore customers (“**Customers**”) and their authorized end users (“**End Users**”) who use the Services, all collectively referred to as “**Users**”, “**you**”, or “**your**”).

We may change this Privacy Policy from time to time at our sole discretion. We encourage you to review this Privacy Policy each time you use the Services to see if the Privacy Policy has been changed, as indicated by the “Last Updated” date set out above. Centrecore may require you to provide consent to the updated Privacy Policy before further use of the Services is permitted.

- 1. Privacy Practices of Customers.** As part of using the Solution, Customers may need to make Personal Information available to us. This Privacy Policy does not apply to the collection, use, and disclosure of Personal Information by Customers for their own purposes. If you want information about whether the Solution is used by an organization that is one of our Customers, the purposes for which your Personal Information is being collected, used or disclosed by the Customer or the Customer’s privacy practices, we encourage you to contact the Customer directly.
- 2. End Users.** If you are an End User, we may indirectly receive information (including Personal Information) about you from a Customer on whose behalf you are provided access to the Solution. This Privacy Policy does not apply to a Customer’s collection, use, and disclosure of Personal Information about their End Users. Customers may be subject to different privacy requirements and obligations that govern how they collect, use, and disclose End User Personal Information. If you are an End User, we encourage you to read the privacy policy of your enterprise or contact their privacy officer to understand how your Personal Information may be collected, used, and disclosed by them.

- 3. Consent.** By using the Services, you consent to the collection, use and disclosure of your Personal Information as described in this Privacy Policy. Except as set forth in this Privacy Policy, your Personal Information will not be collected, stored, used, or disclosed for any other purpose without your consent. We will not actively collect Personal Information for the purpose of sale or marketing of such Personal Information in a way that specifically identifies an individual. You may withdraw your consent to our processing of your Personal Information at any time. However, withdrawing consent may result in your inability to continue using all or part of the Services.
- 4. Information You Provide to Us.** We may collect Personal Information you disclose to us as follows:

 - a. Information Submitted via the Website.** From time to time, certain functionality of the Website may enable you to contact us, in which case we collect any Personal Information you may choose to provide to us via the Website. We ask that you do not disclose sensitive Personal Information (including, without limitation, medical information) when you submit information to us.
 - b. Using the Solution.** If you wish to become a Customer, we collect information required to onboard you onto the Solution such as your name, billing information, email address, and any additional information we require to provide the Solution to you, for which we will obtain your consent at the time of collection.
 - c. Third-Party Integrations.** We may integrate with or rely on third-party platforms and services to provide the Services to you ("**Third-Party Integrations**"). Any Personal Information submitted to us via Third-Party Integrations that we can access will be subject to this Privacy Policy, but please note that such Personal Information will also be subject to the terms of the applicable Third-Party Integration.
 - d. Applying to Work with Us.** If you would like to work with us and submit hiring materials to us (either directly or through a Third-Party Service or recruiter), we collect any Personal Information in your hiring materials, such as your resume, cover letter, transcripts, or certifications. If you submit hiring materials to us, we ask you to only include information relevant to the position you're applying for, and your employment history and education (including, without limitation, certifications and/or degrees obtained, previous work experience, relevant awards, etc.). Please note that any Personal Information you submit through a Third-Party Service or recruiter will be subject to the privacy practices of those entities. If you are a current Centrecore employee, please contact the Centrecore Privacy Officer per Section 12 below for more information on how your employee information may be collect, store, use, and distributed.
- 5. Information We Collect When You Use the Services.**

 - a. Cookies.** When you use the Services, Centrecore may collect certain information through technologies such as cookies and other automatic data collection technologies ("**Cookies**"). We may use Cookies for authentication and to compile aggregate statistics about usage of the Services, such as how long Users spend using

the Services, and what parts or pages of the Website are viewed most often. This information is used to improve the content and operation of the Services. We may also use Cookies to promote the Services through marketing and advertising. These Cookies may be accessed or disclosed to third parties for the purpose of serving you relevant advertisements. You may opt out of Cookies or prevent third-party websites from accessing our Cookies by adjusting your privacy settings on your browser. However, opting out of Cookies may disable some features of the Services and may prevent us from providing you with the information and services you have requested.

- b. Device and Location Information.** When you use the Services, Centrecore may collect information about your device (“**Device Information**”). Some Device Information, such as unique device identifiers, may constitute Personal Information. The Personal Information we collect from Device Information can depend on the individual settings of your device and software that you use to access the Services. We recommend checking the policies of your device manufacturer or software provider to learn what Device Information may be shared with Centrecore. You may disable the sharing of Device Information, but doing so may disable some features of the Services and may prevent us from providing you with the information and services you have requested.

6. How We Use Information We Collect. We use Personal Information in the following ways:

- a.** To authenticate and onboard you, and provide you access to the Services;
- b.** To provide, maintain, improve, and enhance the Services;
- c.** To develop new Centrecore products, features, and services;
- d.** To communicate with you, provide you with updates and other information relating to the Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- e.** For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable, or otherwise of interest to you, where you have subscribed to receive them;
- f.** To find and prevent fraud, and respond to trust and safety issues that may arise;
- g.** For compliance purposes, as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- h.** For other purposes for which we provide notice at the time the Personal Information is collected.

7. Who We Share Your Information With. We may share your Personal Information with our employees, contractors and with third parties, such as selected business partners, suppliers, or sub-contractors, while performing our contractual obligations. These third parties may include web hosting partners, IT service providers, and advertisers.

We have put in place contractual and other organizational safeguards with such third parties to protect your Personal Information from unauthorized uses and disclosures. Such third parties have limited access to Personal Information solely for the purposes described herein, and they will be subject to contractual restrictions prohibiting them from using such Personal Information for any other purpose.

In addition, we may disclose your Personal Information to third parties:

- a. In connection with a corporate re-organization, a merger or amalgamation with another entity, or a sale of all or a substantial portion of our assets or shares, including any due diligence exercise carried out in relation to the same, provided that the Personal Information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the Personal Information;
- b. If we have reason to believe that disclosing this Personal Information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Users, or anyone else (including the rights or property of anyone else) that could be harmed by such activities; or
- c. If we believe in good faith that such disclosure is required by and in accordance with the law.

Our servers and those of third parties who may receive your Personal Information may be located outside of Canada. Accordingly, your Personal Information may be available to foreign governments or their agencies under a lawful order, irrespective of the safeguards we have put in place for the protection of your Personal Information.

8. **Third Parties.** The Services may contain links to third-party websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to the collection, storage, use, and disclosure of your Personal Information by such third parties.
9. **Data Retention and Deletion.** We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. All retained Personal Information will remain subject to the terms of this Privacy Policy. You have the right to ask us to remove your Personal Information from our databases, and we will do so to the best of our ability, but it may not be possible to completely delete all of your Personal Information due to technological and legal constraints (for example, when your Personal Information pertains to another User).
10. **Access and Accuracy.** You may access the Personal Information we hold about you to verify accuracy of your Personal Information, to have a general account of our uses of your Personal Information, and to correct your Personal Information as appropriate.

Upon receipt of your written request, we will provide you with a copy of your Personal Information although in certain limited circumstances, we may not be able to make all relevant Personal Information available to you (for example, where that Personal Information also pertains to another User). In such circumstances, we will provide reasons for the denial to you upon request. We will make every reasonable effort to keep your Personal Information accurate, and to respond to you in a timely manner.

- 11. Security.** We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff and third parties as reasonably necessary to carry out the stated purposes we have communicated to you.
- 12. Contact Us.** If you want to enforce any of your rights under this Privacy Policy or if you have any questions regarding this Privacy Policy or your Personal Information, please contact our Privacy Officer per the information below:
 - a. Via email:** Email us at inquiries@centrecore.ai using the subject line “Re Privacy Policy”.
 - b. Via mail:** Mail us correspondence to #14-75 Horner Ave, Toronto, ON, M8Z 4X5