

## Validere Privacy Policy

Effective Date: November 3, 2023

You can find our previous privacy policy as of April 28, 2021 [here](#)

---

### Table of Contents

Introduction	1
Types of Personal Information We Collect	2
How We Use Your Personal Information	3
Disclosure of Personal Information	3
Processing of Personal Information by Third Parties	4
Cross-border Data Transfer	4
Cookies and Related Technologies	5
How We Safeguard Personal Information	5
Retention of Personal Information	5
Links to Other Websites	6
Your Choices & Access to Your Personal Information	6
How to Contact Us	6

---

### 1. Introduction

This Privacy Policy (the “**Privacy Policy**”) describes how Validere Technologies, Ltd. and Validere Technologies Inc. (together, “**Validere**”, “**we**”, or “**us**”) collects, uses and discloses information, and what choices you have with respect to that information.

This Privacy Policy applies to Validere’s web and mobile applications, portals, platforms, websites (including validere.com and other Validere-administered websites), content, products, software and services, including without limitation, Carbon Hub, Ledger and any other products which Validere may offer from time to time (individually and collectively, the “Platform”). IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, DO NOT USE OR VISIT ANY PORTION OF THE PLATFORM. USE OF THE PLATFORM AND YOUR AGREEMENT TO THIS PRIVACY POLICY CONSTITUTES YOUR EXPRESS CONSENT FOR THE COLLECTION, PROCESSING AND TRANSFER OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS POLICY’S TERMS.

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 Platform signifies your consent to the revised terms of this Privacy Policy.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Validere any rights or obligations outside of, or in addition to, any rights or obligations imposed by any applicable international union, federal, provincial and/or state privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and the laws of the applicable jurisdiction, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such applicable privacy laws.

## 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.

We collect Personal Information that you share with us directly or provide in connection with the Platform. 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 including professional details, such as your company, industry, and role/ job title. 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 Platform, such as information you provide via email, telephone, online forms, support requests, or any other means of communication.
- **Usage Data.** When you access the Platform 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 Platform. When you use a mobile device like a tablet or phone to access our Platform, 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 Platform, 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 evaluate usage of our Platform. We use these tools to obtain aggregated statistical information about the use of our Platform 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 Platform 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 Platform, 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 Platform. 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 Platform 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 use of the Platform
- 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 Platform (e.g., to remember information so you will not have to re-enter it during your visit or the next time you access the Platform)
- to provide, improve, test, and monitor the effectiveness of the Platform
- to process payments
- to meet legal and regulatory requirements
- for such other purposes consistent with these objectives

Validere 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.

Validere or our service providers may use your Personal Information to create aggregate, de-identified data that we may use or disclose for any purpose at 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 Platform, and to tailor the Platform for you. As noted below, we may also use cookies to improve our Platform and collect statistical information about how our Platform is being used.

### **4. Disclosure of Personal Information**

**Except as specified in this Privacy Policy, we will not sell or transfer 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
- 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 Platform, 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 jurisdictions other than your home country, where it may be subject to the laws of the jurisdiction in which it is stored. By using the Platform, you expressly agree that your Personal Information may be transferred to countries outside of your home country for the purposes outlined in this Privacy Policy. You understand and acknowledge that your personal data may be transferred to and processed in countries that may not provide the same level of data protection as your home country.

You are aware that the transfer of your personal data is necessary for Validere to provide

the Platform you have requested, which includes, without limitation, the consolidation of user-generated information for analytics purposes. You understand that your personal data may be transferred to third parties, including affiliates and Service Providers, who may be located in countries with different data protection laws, and that your personal information may be processed and stored on systems located outside of your home country.

By providing this consent, you acknowledge that your personal data may be subject to access requests by governmental authorities or law enforcement agencies in the recipient countries in accordance with their local laws.

**You acknowledge that you have been provided with information about the risks and safeguards associated with international data transfers, and you have had the opportunity to seek clarification or legal advice if needed before consenting to this Privacy Policy.**

## **7. Cookies and Related Technologies**

We use “**cookie**” technology to provide you with a better user experience as you use the Platform. A cookie is a tiny element of data that our Platform can send to your browser, which is stored on your device and records your preferences and your use of the Platform so we can recognize you when you return. We use cookies to help us understand how you use our Platform so we can make our Platform 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 Platform, you may not be able to take full advantage of all the features of our Platform.

## **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 Platform, as determined by the management of the Corporation.

These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction. While we take reasonable administrative, technical, and physical measures to protect the information you submit via the Platform or in connection with the Platform from accidental or unlawful destruction, loss, or alteration, and from unauthorized access, use, or disclosure, we cannot guarantee its absolute security. No Internet or electronic communication transmission is ever fully secure or error-free. Internet or electronic communications, including those sent through the Platform, may not be secure. Unfortunately, we cannot guarantee complete security: for example, (i) unauthorized access, use, or disclosure; (ii) hardware or software failure; and (iii) other events may compromise the security of your personal information at any time. You should use caution whenever submitting information through the Platform and take special care in deciding which information you provide us with.

## **9. Retention of Personal Information**

We retain your Personal Information only where required to fulfill 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. Links to other Websites

This Privacy Policy applies only to the Platform. The Platform may contain links to other websites to which this Privacy Policy does not apply. The links from the Platform do not imply that we endorse or have reviewed these websites. The policies and procedures we describe here do not apply to these websites. We neither can control nor are responsible for the privacy practices or content of these websites. We suggest reviewing the privacy policies of these websites.

## 11. 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 Platform. 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 Platform.

If you are a registered user of our Platform, 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.

## 12. 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](mailto:privacy@validere.com) or by mail at the following address:

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