

SquareTrade Canada, Inc.

PRIVACY STATEMENT

EFFECTIVE: August 25 2023

Your privacy is very important to us. This Privacy Statement (“**Statement**”) describes the privacy practices of SquareTrade Canada, Inc., and its subsidiaries, including, without limitation, SquareTrade, Inc. (collectively “**SquareTrade**”, “**our**” or “**we**”). This Privacy Statement (the “**Statement**”) applies to data and information collected from Canadian residents and explains the Personal Information (as defined below) we collect, why we collect it, how we use it, the other parties to whom that Personal Information may be disclosed, and the choices you can make regarding your Personal Information. In many cases, your Personal Information will be collected through our websites, including squaretrade.ca and squaretrade.com or the SquareTrade Mobile Application.

This Statement is designed to comply with Canadian requirements, including the federal legislation, *Personal Information Protection and Electronic Documents Act*, (“**PIPEDA**”), applicable provincial privacy legislation, and with *Canada’s Anti-Spam Legislation* (“**CASL**”). We reserve the right to modify or amend the Statement to comply with legal requirements or with our operational requirements (in compliance with legal requirements) from time to time without notice. If such changes are to be applied retroactively or to Personal Information already in our possession, we will provide you with notice of the modifications or amendments.

“**Personal Information**” is information that identifies you as an individual or that relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with you as a particular consumer or household (referred to as “**you**” in this Statement). “Personal Information” does not include deidentified or aggregated information.

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1. INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect Personal Information about you in several different ways and from several sources. We collect Personal Information from you when you provide it to us directly, including when you create an account with us, request products, services or information from us, register a claim with us, purchase products or services from us, participate in Forums or other activities on our sites, applications, or other services, send us messages or posts, respond to consumer surveys, or otherwise interact with us.

When you visit, download, and/or interact with our sites or applications, we and service providers use automatic data collection technologies such as cookies, flash cookies and web beacons to make our sites and applications more useful to you. These technologies collect information about your equipment, internet connection, browsing actions, and patterns, including Internet Protocol ("IP") address, browser type, internet service provider ("ISP"), referring/exit pages, operating system, date/time stamp, and clickstream data.

We and service providers also collect certain information when you download and use our applications, including your geographic location, how you use the applications, and the type of device you use. In the event our applications crash on your mobile device, we may receive information about your mobile device model, software version and device carrier. We may also collect information about you from third parties such as service providers and marketing companies.

The following are the categories of Personal Information that we may have collected about you and examples of the Personal Information that fall into those categories:

PERSONAL INFORMATION CATEGORIES	EXAMPLES
PERSONAL IDENTIFIERS AND OTHER IDENTIFYING INFORMATION	Name, alias, signature, postal address, email address, unique personal identifier, online identifier, internet protocol (IP) address, phone number, description of your physical characteristics, insurance policy number, family member information, bank account number, credit card number or

	other payment or financial information, medical information or health insurance information, date of birth, driver's license number, or other similar identifiers.
COMMERICAL INFORMATION	Records of personal property, account name, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
INTERNET OR OTHER ELECTRONIC NETWORK ACTIVITY INFORMATION	Browsing history, search history, information regarding your interaction with our websites, application or advertisement, and mobile device information including device identifier or other.
MULTIMEDIA INFORMATION	Audio, electronic, visual or similar information.

Note about children: Our sites are not intended for children. We do not market any products or services to children under the age of thirteen (13) or knowingly collect any information from children under the age of thirteen (13). A parent or guardian who becomes aware that his or her child under the age of thirteen (13) has used our services or products and provided Personal Information to us, may contact us at privacy@squaretrade.com and we will delete that Personal Information as soon as possible. We do not sell the Personal Information of any individuals, including children.

2. USE OF YOUR PERSONAL INFORMATION

We use your Personal Information and other information for business purposes including to:

- **Provide and maintain your services and products.** We may use your Personal Information to create, maintain, customize, and secure your account with us or otherwise register you with our services and products, which includes the sale and administration of protection plans providing coverage for mechanical and electrical breakdown and, in some cases, issues arising from accidental damage. We may also use your Personal Information to process your requests, purchases, transactions, payments and prevent transactional fraud.
- **Improve, develop and analyze our sites, services and products.** We use your Personal Information and other information to:

- analyze, improve, develop or deliver our sites, products and services and develop new services, products or features using algorithms, analytics software and other similar methods,
- conduct actuarial or research studies to maintain, protect and develop our networks, services, and products and protect our customers, and
- analyze how visitors use our Sites to improve the Sites and enhance and personalize your experience.

We collect some information used for these purposes using analytics software, cookies and other tracking technologies. For more information about the collection and use of this information, see Cookies and Other Tracking Technologies below.

- **Communicate with you about your service or product.** We may communicate with you about your account or transactions with us, respond to your comments, questions or requests, provide customer service, provide you with notices or other communications, and send you information about features on our sites, applications, or other services or changes to our policies. With your consent, we may also post your testimonial along with your name and other Personal Information on our sites or other media channels.
- **Provide marketing communications.** We may use your Personal Information to send you marketing communications, including e-mail or text messages, which are treated as commercial electronic messages” (“CEMs”) under CASL. We comply with all requirements of CASL, which provides that you have the right to consent, in advance, before receiving CEMs from us, unless an exemption applies. One important exemption is where you have an “existing business relationship” with us. This exemption will apply where you have purchased a product or service within the two-year period immediately prior to the date on which the CEM is sent to you. Where the purchase was in the form of subscription or another kind of continuing contract, the exemption runs for two years from the termination date of that contract. In addition to obtaining your prior consent to receive CEMs, we will include the required information with all CEMs and provide the opportunity for you to Unsubscribe from CEMs at any time. If you no longer consent to receiving CEMs from us, please use the Unsubscribe link in a message that we send to you, or email us at privacy@squaretrade.com.
- **Comply with legal requirements and protect the safety and security of our business, services, and sites.** We may use your Personal Information to comply with laws, regulations or other legal obligations, to assist in an investigation, to protect and defend our rights and property or the rights of third

parties or enforce terms and conditions. We may also use your information to prevent suspected fraud, threats to our network or other illegal activities, prevent misuse or for any other reason permitted by law. We may use your Personal Information to protect our company, our affiliates, our customers, our network and our sites.

- **Update or correct our records.** We may receive Personal Information about you from other sources, including publicly-available databases, affiliates or third parties from whom we have purchased data, and combine that with other Personal Information we have about you to update our records. For example, we may obtain change of address information from public sources and use that information to update or correct your address information.

3. DISCLOSURE OF YOUR PERSONAL INFORMATION

We do not sell your Personal Information. We may disclose your Personal Information to our corporate affiliates for business purposes consistent with the uses described in this Statement. We may also disclose information about you to third parties as described in this Statement or whenever you consent to or direct such disclosure. We strive to work with companies that share our commitment to privacy. We may also disclose information to others in an aggregated or de-identified form that does not reasonably identify you and as such would no longer be considered your Personal Information.

We may also disclose your Personal Information or other information to third parties for business purposes or as required or permitted by law including to:

- **Service providers:** We may disclose your Personal Information to businesses that are service providers to SquareTrade, such as providers of computer, repair facilities, logistics providers, call centres, technology, telecommunications, accounting, or marketing services, consultants, and other service providers, who process information that includes Personal Information on our behalf and to whom we disclose Personal Information for a business purpose pursuant to a written contract which requires the service provider to comply with this Statement.
- **Marketing and advertising partners:** We may disclose your Personal Information and other information to third party online marketing and advertising partners or permit these partners to collect information from you directly on our sites to facilitate online advertising. The Cookies and other Tracking Technologies section below has more details about these activities.

- **Other parties at your direction:** Personal Information may be disclosed to third parties when you elect to disclose your Personal Information to selected companies, to permit them to send you offers and promotions about their products and services, or if you direct us to disclose your Personal Information to third-party sites or platforms, such as social networking sites. When we disclose your Personal Information to third parties in these ways, the information they receive is subject to the third parties' own privacy policy and privacy practices, rather than to this Privacy Statement. It is up to you to review those third party policies before directing us to make such disclosures.
- **Third parties in connection with a business transaction:** Your Personal Information may be disclosed to third parties in connection with a SquareTrade corporate transaction, or SquareTrade affiliate corporate transaction, such as a merger, sale of any or all of our company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business, or in the event of a bankruptcy or related or similar proceeding.
- **Law enforcement, regulators and other parties for legal reasons:** Your Personal Information may be disclosed to third parties, as required by law or legal demand, or if we reasonably believe such action is necessary to:
 - comply with the law and the reasonable requests of regulators, law enforcement or other public authorities,
 - protect our or others safety, rights or property,
 - investigate fraud or to protect the security or integrity of our sites or any product or services, and/or
 - exercise or defend legal claims.

Aggregated information. We may collect, use, retain, sell, or disclose consumer information that is deidentified or aggregated information, such that it is not Personal Information as described in this Statement.

4. COOKIES AND OTHER TRACKING TECHNOLOGIES

Technologies and Information Collected: When you visit our sites, we and our service providers automatically collect information about your use and access of these sites. We collect this information through a variety of tracking technologies, including cookies, flash objects, web beacons (also called pixel tags), embedded scripts, location-identifying technologies, and similar technology (collectively, "tracking technologies"). Information we collect automatically about you may be combined with other Personal Information we collect directly from you. The information collected in this manner includes:

- The site from where you accessed our sites, where you went to when you left the sites, how frequently you visit the sites, when and whether you open emails or

click the links contained in emails, pages you visit on our sites, the links you click and ads you view, or your location when you access our sites,

- Information about the computer, tablet, smartphone or other device you use, such as your IP address, browser type, Internet service provider, platform type, device type/model/manufacture, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account (including, e.g., a persistent device identifier or an Ad ID), and other similar information,
- Analytics information collected by us or via third party analytics tools, to help us measure traffic and usage trends for the sites and to understand more about the demographics and behaviors of our users, and
- How often you use a mobile app, from where the app was downloaded, events that occur within the app, aggregated usage, and performance data.

Use of the information: We or our service providers may use the information collected through tracking technologies to improve, enhance and personalize your customer experience, to monitor and improve our sites and for other internal purposes such as:

- Remembering information so that you will not have to re-enter it during your visit or the next time you visit the sites,
- Provide custom, personalized content and information, including targeted content and advertising,
- Identify and contact you across multiple devices,
- Provide and monitor the effectiveness of our sites,
- Perform analytics and detect usage patterns on our sites,
- Diagnose or fix technology problems,
- Detect or prevent fraud or other harmful activities, and
- Otherwise to plan for and enhance our sites.

Our service providers include Adobe and Google. To learn about Adobe Analytics privacy practices or to opt-out of cookies set to facilitate reporting, [click here](#). To learn more about Google's privacy practices, [click here](#). To access and use the Google Analytics Opt-out Browser Add-on, [click here](#).

Your choices regarding cookies: If you prefer not to accept cookies, most browsers will allow you to change your browser settings to disable existing cookies, automatically request cookies or to notify you when you receive a cookie. However, if you disable, modify, or reject cookies, some parts or functionalities of our sites may be inaccessible or not function properly. For example, disabling cookies may require you to repeatedly enter information to take advantage of services.

Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to “Do Not Track” signals from your browser at this time.

5. YOUR RIGHTS AND CHOICES

We provide you with the ability to exercise certain rights and choices regarding your Personal Information. This Section describes your rights and how to exercise those rights.

To better protect you and your Personal Information, we will only respond to access or deletion requests that we have been able to properly verify through our authentication processes. To verify your identity, you will be asked to provide several pieces of information, such as demographic information. Once you submit an access or deletion request, we will use this information to verify your identity. Once we have verified your identity, we will notify you that your request has been confirmed.

To submit an access, revision or deletion request, please email us at privacy@squaretrade.com or contact us at SquareTrade Canada, Inc., Attn: Privacy Officer, 2000 Sierra Point Pkwy, Suite 300, Brisbane, CA 94005. Responses to a verified request may take up to 30 days, depending on the nature of the request. If additional time is needed, we will provide an initial response within 30 days, and provide information about notify you of the reason and the additional time.

Right to Access and Correct Your Personal Information: You have the right to obtain information about the existence, use and disclosure of your Personal Information and to be given access to that Personal Information. This is subject to certain exceptions, including where disclosure would reveal confidential commercial information, or the Personal Information of another person. You have the right to challenge the accuracy and completeness of the Personal Information held by SquareTrade and to have it amended or updated as appropriate. Upon request, we will provide information to you about our collection and use of your Personal Information, including the Personal Information collected, our business purposes for collecting the Personal Information, the specific pieces of Personal Information we have about you, and the third parties to whom we disclose your Personal Information. You may request disclosure of any or all of the following:

- Specific pieces of Personal Information we have collected about you,
- Categories of Personal Information collected,
- Categories of sources from which the Personal Information is collected,
- Categories of third parties with whom we share Personal Information collected, or
- The business purposes for collecting the Personal Information.

Right to Control the Dissemination of Personal Information: You have the right to request that we cease disseminating any of your Personal Information or that we de-index any hyperlink that provides access to it in certain circumstances (e.g., if the dissemination contravenes the law or a court order or causes real risk of significant harm or risk of serious injury to the reputation or privacy of an individual).

Right to Delete Personal Information: You have the right to request that we delete any of the Personal Information we hold about you, subject to the limitations of our contracts with you, and reasonable notice. We will delete your Personal Information in response to a verifiable request, unless we must retain it to:

- Complete or fulfill a transaction for which we collected the Personal Information, provide a good or service you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you,
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities, or
- Comply with a legal obligation of SquareTrade.

Right to Notification Regarding a Breach of Security. In compliance with regulations under PIPEDA and similar requirements of provincial legislation, we will notify you and the applicable regulatory authorities in the event of a breach of our security safeguards involving Personal Information where it is reasonable to believe that the breach creates a real risk of significant harm (under PIPEDA, and under Alberta, British Columbia and Ontario privacy law) or a risk of serious injury (under Quebec privacy law) to you.

Additional Rights and Choices

In accordance with applicable law, you have the following additional rights:

- You may correct or update your account.
- You may change your choices for subscriptions, newsletters, marketing and promotional communications. To unsubscribe from marketing and promotional communications, please use the Unsubscribe link in a message that we send to you, or email us at privacy@squaretrade.com.
- You may choose whether we disclose your Personal Information to other companies so they can send you offers and promotions about their products and services.
- You may stop all collection of information by an application by uninstalling the SquareTrade Mobile application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

6. OTHER AVAILABLE CHOICES

Email Marketing: Each time you receive newsletters or emails from us that directly promote the use of our products and services, or third-party products and services, you may request to stop receiving further communications from us. You will have the opportunity to Unsubscribe by responding to the email or newsletter or by contacting us. To opt-out from receiving marketing and promotional emails, please email us at privacy@squaretrade.com or contact us at SquareTrade Canada, Inc., Attn: Privacy Officer, 2000 Sierra Point Pkwy, Suite 300, Brisbane, CA 94005.

If you Unsubscribe from receiving marketing emails from us, we may still send you non-promotional emails such as emails about your products or services, our ongoing business relations, responses to your requests and inquiries, or service-related communications, including notices of any updates to terms and conditions or our privacy practices.

You may also change the communication preferences for your account by going to the My Profile page at <http://www.squaretrade.com/my-warranties>.

7. DATA TRANSFERS, STORAGE AND PROCESSING GLOBALLY

We operate globally and may transfer your Personal Information to our corporate affiliates, partner companies, service providers, or third parties in locations around the world for the purposes described in this Statement. Wherever your Personal Information is transferred, stored or processed by us, we will take reasonable steps to safeguard your Personal Information and we will ensure that your Personal Information receives adequate protection by the affiliate, partner, service provider or third party.

We comply with applicable federal and provincial requirements in Canada regarding the collection, use, and retention of Personal Information. If we transfer Personal Information to a third party, the third party's access, use, and disclosure of the Personal Information must also be in compliance with this Statement and our obligations, and we will remain liable under for any failure to do so by the third party unless we prove we are not responsible for the event giving rise to the damage.

8. SOCIAL MEDIA, LINKS AND EXTERNAL SITES

Links to other company's sites may be provided on our sites as a convenience to you. If you choose to go to these external sites, you will be subject to the privacy practices of those external sites; we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our sites to read the privacy policies of every site you visit, as those privacy policies may differ from our Statement. Our Privacy Statement applies solely to the sites where it appears.

Our sites include Social Media features, such as the Facebook Like button and widgets, such as the Share this button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social Media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

9. PROTECTION OF YOUR PERSONAL INFORMATION

The protection and security of your Personal Information is important to us. We use a combination of reasonable technical, administrative, and physical safeguards to protect your Personal Information. However, no site, application, database or system is completely secure or "hacker proof." So, we cannot guarantee its absolute security. You are also responsible for taking reasonable steps to protect your Personal Information against unauthorized disclosure or misuse.

We limit access to your Personal Information to those who need it to do their jobs. We comply with all applicable privacy and data security laws.

10. CONTACT INFORMATION

If you have any questions or comments about this Statement or the privacy practices described herein, please contact us at SquareTrade Canada, Inc., Attn: Privacy Officer, 2000 Sierra Point Pkwy, Suite 300, Brisbane, CA 94005 or via e-mail at privacy@squaretrade.com.

11. CHANGES TO OUR PRIVACY STATEMENT

We may periodically update or revise this Statement. The date at the top of this page shows when it was last revised. The current version of this Statement is posted on all of our websites. We will let you know when we update the Statement by changing the date or other appropriate means.