

PRIVACY POLICY – HIGHLIGHTS

CITYWIDE AUTOMATION INC. and its corporate affiliates (“Citywide”, “we”, “us”, “our”) understand that your time is valuable. Therefore, we have set out below some important highlights of our Privacy Policy. You can obtain more information about how we collect, use, disclose and protect your personal information by reviewing our full Privacy Policy below.

WHAT PERSONAL INFORMATION DO WE COLLECT?

- We may collect personal information directly from users of our applications including Lifetech and PropTech (and any other applications we introduce at any point in the future) (the “Sites”), software or services, including name, date of birth, address, phone number, email, emergency address, gender, name(s) of partners and children, age, profile photo and/or video, authentication information, location, RF card information, device and mobile phone IP address information, device MAC address information, and log information. Users may also provide additional information by choosing to fill out free-form fields on our Sites if available.
- By using our Sites, software, or services, you are choosing to provide us with your personal information and you acknowledge and consent to the processing of your personal information in Canada.
- We also use cookies on our Sites and automatically collect certain information about the way our Sites is used.

WHY DO WE COLLECT PERSONAL INFORMATION AND HOW IS IT USED?

- We collect personal information to facilitate the use of our Sites, software and services.
- We also use personal information for research purposes.
- The personal information that we collect about devices and the use of our Sites is used in an aggregate and de-identified form to evaluate and improve our services.

IS PERSONAL INFORMATION SHARED OR DISCLOSED?

- Personal information provided to us is never sold or rented to other organizations.
- We also may use certain third party service providers who may have access to the information we collect.
- We may also disclose or share personal information for fraud prevention, and other permitted disclosures under applicable law.

HOW DO WE PROTECT PERSONAL INFORMATION

- We have implemented safeguards to protect personal information under our control, and regularly review our practices to ensure they align with reasonable practices appropriate to the level of sensitivity of the information, in order to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

WHAT ARE THE RISKS?

- Although we take steps to safeguard the personal information under our control, “perfect security” does not exist online or elsewhere. In particular, we cannot guarantee the security of information posted or transmitted using our Sites or via email. It is possible that third parties may unlawfully intercept or access such information.

WHAT ELSE SHOULD YOU KNOW

- We may use cloud services provided by third party service providers to store the personal information that we collect, and other service providers outside Canada. This means that your information may be transferred to, or stored in, another country and accessible to foreign courts, law enforcement and national security authorities.
- We may amend our Privacy Policy from time-to-time. Although we will try to notify you of major changes by posting updates on our webpage or on the Sites itself, we encourage you to check for updates.
- You can contact us with questions, complaints or for to access your personal information.

MOBILE APP PRIVACY POLICY

CITYWIDE AUTOMATION and its corporate affiliates (“**Citywide**”, “**we**”, “**us**”, “**our**”) respect and uphold individual rights to privacy and the protection of personal information while balancing such rights with our need to process your personal information to manage our business and deliver our services to you. Based on applicable privacy and data protection principles common to Canada and other jurisdictions to which we are subject, we have developed this privacy policy (the “**Policy**”) to explain our practices for processing your personal information. This Policy does not apply to our employees’ personal information or any anonymized information.

This Policy describes our practices with respect to how we may collect, use, disclose, retain, dispose and otherwise process (collectively, “**process**”) and how you may correct, update and access your personal information that you provide as a user of (a) the mobile applications known as Lifetech and PropTech (the “**Sites**”), (b) any front-end software we provide you that interacts or interfaces with the Sites (the “**Software**”), excluding third party software that may interact with the Sites or the Service as defined below, and (c) the services we provide through the Sites and/or the Software (collectively, the “**Service**”).

Our Sites and Software may contain links to other apps, websites or Internet resources which are provided solely for your convenience and information. When you click on one of those links, you are contacting another Internet resource. We have no responsibility or liability for, or control over, those other Internet resources or their collection, use and disclosure of your personal information. We encourage you to read the privacy policies of those other Internet resources to learn how they collect and use your personal information.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. By using our Sites, Software, or Service, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to the processing of your personal information in Canada in accordance with this Policy and as may be further identified when the personal information is collected. If you are located or residing outside of Canada, please be aware that our Sites, Software and Service are intended for and directed to users in Canada, and the privacy laws and principles in Canada may differ and not offer the same level of protection as those in your location or residing country/region. Through your continued use of our Sites, Software or Service, you are transferring your personal information to Canada and you expressly consent to that transfer. We will use this consent as the legal basis for such data transfer, unless otherwise stated in this Policy.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any of the Sites, Software or Service or otherwise provide any personal information to us.

1. PERSONAL INFORMATION

For the purposes of this Policy, “**personal information**” means any identifiable information about an individual, including but not limited to an individual’s name, home address, telephone number, social insurance number, gender, income and family status, except any other information otherwise exempted by the applicable laws of Canada and other jurisdictions. For example, in Canada, personal information does not include any business contact information that is processed solely to communicate with that person about his or her employment or profession.

When you use our Sites, Software or Service, we may collect the following personal information from you:

- Demographic information such as gender, age, marital status, and location of residence (city/province/country);
- Contact information such as name, email address, mailing address, and phone number;
- Billing information as appropriate such as credit card number and billing address;
- Unique identifiers such as profile photo and/or video, username, account number, and password;
- Professional information such as name of employer, occupation, location of occupation, and insurance; and
- Technical information such as authentication information, device MAC address information, device and mobile phone IP and IMEI address information, and browser and log information.

Your personal information may be collected when:

- You register for an account with us;
- You connect with us through social media;
- We collect cookies and other tracking information through your use of Sites;
- We collect data from third parties or publicly available sources.

We only collect personal information that we need. We encourage you to not provide us with any personal information beyond what is necessary and as requested by us.

Cookies and Log Files

Our Sites may use “cookies” and similar technologies like single-pixel GIFs and web beacons. A “cookie” is a text file that is sent to your computer or device and from your computer each time you use the site. Cookies can track how and when you use the Sites and which site you visited immediately before. A cookie does not damage your system and identifies your browser, not you personally.

We use cookies to collect information such as the server you are logged onto, the domain name of your internet service provider, your browser type and version and your IP address. We may also derive the general geographic area associated with an IP address.

Sometimes, we use cookies in combination with “web beacons” or similar technology to collect information about how our Sites is used, such as: your IP address and location data, weblogs, time zone, date, your language preferences, browsers used, web addressees visited, other communication data, searches conducted, pages visited, and any other relevant information about your online experience.

If you do not wish to receive cookies, you may be able to disable them. Although this may provide you with enhanced anonymity, it may affect the functioning of our Sites.

To the extent that our Sites contains links to other apps or sites, the owners of those sites are responsible for the privacy practices or content of those other sites. We do not endorse and are not responsible in any way for the privacy practices on third party websites.

Information about Minors

This Site is intended solely for users who are not minors (13 years of age or older). We do not knowingly collect personal information about any minor. No such minor, nor any parent or guardian as it relates to such minor, should submit such minor's personal information to us through the Sites, Software or otherwise for any reason and under any circumstances.

2. PURPOSE FOR WHICH PERSONAL INFORMATION IS PROCESSED

We may process your personal information for the following purposes (the “**Purposes**”):

Specific

- To verify and authenticate your identity;
- To allow us to use the services of third party services such as:
 - Firebase Notifications (Google LLC) to allow us to target analytics-based audiences and track opening and conversion events; and
 - Apple push notification services which allow us to keep you informed with timely and relevant content relating to the , whether the Sites is running in the background or inactive;

Generic

- To ensure that the Sites, Software or Service is optimized for your use and benefit;
- To operate, maintain and provide to you the Service, features and functionality of the Sites or Software;

Boiler Plate

- To communicate with you to provide you services, contacts, materials and/or recommendations for your needs as identified by you through phone, email, or the Sites;
- To carry out our obligations arising from any contracts entered into between you and us;
- To comply with internal policies and procedures and other legal, accounting, or security requirements;
- To share your personal information with our employees, contractors, consultants and other third party service providers such as web hosting providers, advertising agencies, payment processors or customer service agencies (“**Third Party Processors**”) who require this information to assist us with establishing, maintaining and managing our relationship with you and optimizing and providing the Sites, Software or Service for your use and benefit. Please note that we may change or add Third Party Processors at any time, in our sole discretion, either in Canada or elsewhere. We encourage you to reference this Policy from time-to-time, to obtain updated information. Given the nature of cloud services, personal information may be stored outside Canada, anywhere in the world, and may be accessible to foreign courts, law enforcement and national security authorities in the jurisdiction(s) where it is transferred or stored.

We will only process your personal information for the Purposes for which we intend to process such information. Otherwise, we will not process your personal information without your consent.

3. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information for the Purposes as described in this Policy in the following ways:

- To our employees and contractors;
- To our business partners;
- To our service providers including online hosting providers, advertising agencies, payment processors and customer service agencies; and
- To law enforcement, government or regulatory bodies, or other lawful authorities.

Your personal information that we collect may be processed outside of Canada. As a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with other jurisdictions' applicable laws.

4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

Consent

We will process your personal information only with your knowledge and consent, except where exempted, required or permitted by applicable laws. The form of consent may vary depending on the circumstances and the type of information being requested. Your consent may be express with clear options to say "yes" or "no", such as by being asked to check a box to indicate your consent, or implied, such as when you provide us with your address through a form or email seeking information and we use those means to respond to your request. Your consent can also be provided by your authorized representative. Taking into account the sensitivity of your personal information, purposes of collection, and your reasonable expectations, we will obtain the form of consent that is appropriate to the personal information being processed. By using our Sites, Software, or Service, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to the processing of your personal information in accordance with this Policy and as may be further identified when the personal information is collected. When we process your personal information for a new purpose, we will document that new purpose and ask for your consent again.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any of the Sites, Software or Service or otherwise provide any personal information to us.

You may refuse to provide consent or may notify us at any time that you wish to withdraw or change your consent to the processing of your personal information without penalty, subject to legal or contractual restrictions and

reasonable notice by (i) changing your privacy preferences through the Sites or Software, (ii) deleting your account with the Sites or Software and stopping use of the Sites or Software, or (iii) opting out of the use of your personal information such as unsubscribing to any functionality, notification, newsletter or mailing list subscription as applicable that we provide through the Sites or Software. However, if you withdraw or change your consent, we may not be able to provide you with the Service through the Sites or Software.

Other Legal Bases

Aside from consent, we may also process your personal information under other legal bases, as permitted by the applicable laws.

5. SECURITY OF PERSONAL INFORMATION

The security of your personal information is important to us. We protect personal information using physical, technological and organizational safeguards. We regularly review our practices to ensure they align with reasonable industry practices appropriate to the level of sensitivity to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure; as such, despite our safeguards and protocols, we cannot fully guarantee the security of your personal information and you should always exercise caution when disclosing personal information over the Internet.

6. REQUESTS FOR ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

Applicable privacy laws allow, to varying degrees, individuals the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control. You may request access to and review of your personal information in our possession. However, access may be declined where permitted or required by applicable law.

You may request that we change or delete your personal information in our possession. We reserve the right not to change any personal information if we do not agree that it is inaccurate or outdated, but will append any alternative text the individual concerned believes appropriate.

If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

7. CASL POLICY

We are committed to compliance with [Canada's Anti-Spam Legislation \("CASL"\)](#). Any electronic communication we send to outside parties is protected by a range of business procedures, processes and policies to ensure that such communication is done in compliance with CASL. In our electronic communications with outside parties, we comply with the rules established by CASL and enforced by various Canadian authorities including the Canadian

Radio-television and Telecommunications Commission. CASL regulates, and our policies generally apply to, each commercial electronic message (a “CEM”) that we send. A CEM is an electronic message sent to an electronic address that, among its purposes, encourages participation in a commercial activity.

In addition to adopting and updating this Policy, we undertake various transparency initiatives to ensure we comply with CASL, which include:

- **Consent**— we do not send you CEMs without your consent. This consent typically must be “express” (expressly acknowledged by you), but in certain circumstances can be “implied” or specifically exempt from consent requirements. We modified or adopted our sign-up, registration and consent forms in order to ensure that your consent is meaningful (i.e. informed and freely given) as per CASL. When we collect your electronic contact information, you will know the exact purposes behind the collection.
- **Content**— we adopted processes to ensure that our CEMs contain the following requirements prescribed under CASL, which will usually be in the footer of the CEM. We will:
 - o Identify ourselves as the party sending the CEM, and whether we are sending the message on our own behalf or on behalf of someone else;
 - o Provide you with our contact information; and
 - o Set out a clear, working unsubscribe mechanism or preference centre that is easy to use, automatic, and at no cost to you (other than your own cost of connecting to the Internet).
- **Clarity** — we ensured that each aspect of a CEM, including its header, content, or any links or URLs in the CEM) conveys the appropriate information, whether viewed individually or taken as a whole, so that you always know what you are clicking on.

If you receive a CEM from us but believe that you should not have or no longer wish to receive CEMs, we will aim to respect your preferences in a timely manner once you update them through our unsubscribe mechanism. CASL requires us to process unsubscribe requests within 10 business days. If you have any questions or concerns about our unsubscribe options, you may contact us at the address indicated in Section 10 below.

8. RETENTION OF YOUR PERSONAL INFORMATION

We generally keep personal information for only as long as it is needed to accomplish the purposes for which it was collected, or as needed for authorized or legitimate purposes. More specifically, we retain personal information as long as necessary for the fulfillment of the identified purposes for its collection or as otherwise necessary to comply with applicable laws or protect our interests. When personal information is no longer necessary or relevant for the identified purposes, or is required to be retained by applicable laws, we will take steps to have it deleted, destroyed, erased, aggregated or made anonymous. We use reasonable industry practices to ensure we have adequate controls, schedules and practices for information and records retention and destruction which apply to personal information.

9. UPDATES OR CHANGES TO THIS POLICY

This Policy was last updated in 2021. We will occasionally update this Policy and revise the “last updated” date appearing in this paragraph.

If we make any material changes we will either (a) notify you by email (sent to the email address listed in your account), or (b) provide a notice on the Sites or otherwise through the Service before the change becomes effective. Any change to this Policy will apply to existing information, as well as information collected onwards from the date that this Policy is posted or on the date as specified in the notification. We encourage you to periodically review this page for the latest information on our privacy practices to ensure you are aware of any changes. Your continued use of the Service signifies your acceptance of any changes to this Policy.

10. CONTACT INFORMATION FOR PRIVACY OFFICER

You can direct any questions or concerns regarding our compliance with this Policy and our processing of your personal information to our Privacy Officer, Bill Bailey by emailing bbailey@thecitywidegroup.com.

We strive to offer an accessible and simple complaint procedure. We will promptly investigate all complaints received, and if a complaint is justified, we will take the necessary steps to resolve the issue in question.

End of Policy