

Introduction

Code Inc. ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you download, install, register with, access, or use the Code Wallet (the "**App**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in this App, in email, text, and other electronic communications sent through or in connection with this App, and received through Google APIs, such as openid.

This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.
- You provide to or is collected by any third party (see [Third-Party Information Collection](#)).

Our websites and other apps, and these other third parties have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

Consent

By downloading, installing, registering with, accessing, or using this App, you expressly consent to the collection, use, disclosure and storage of your information and other information received by us as a result of such use in accordance with this Privacy Policy and the Terms of Use ([http://www.\[Code\].com/pages/terms](http://www.[Code].com/pages/terms)), and as permitted or required by applicable law. If you do not agree with the terms of this Privacy Policy or the Terms of Use, you should immediately stop using or accessing this App. Please note that this App may be hosted in countries other than yours, including the United States. By accessing this App, you expressly consent to the transfer of your information outside of your home country, which may provide for different data protection rules than in your country. We make use of third-party service providers, including service providers located in Canada, the United States and the European Union to store and process data, including your information, on our behalf. When acting on our behalf, such service providers are only authorized to collect, use, disclose or store personal information as described in this Privacy Policy. However, the government, courts, law enforcement, security, or regulatory agencies of a particular country may be able to obtain access to or disclosure of personal information as permitted by the laws of that country.]

Children Under the Age of 13

The App is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [CONTACT INFORMATION].

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Your California Privacy Rights](#) for more information.

Information We Collect and How We Collect It

We collect information from and about users of our App:

- Directly from you when you provide it to us.
- Automatically when you use the App.
- From Google when you sign-in.
- From Torus when we authenticate your sign-in.

Information You Provide to Us

When you download, register with, or use this App, we may ask you to provide information:

- By which you may be personally identified, such as name, email address, language preference, device location or ANY OTHER INFORMATION THIS APP COLLECTS THAT IS DEFINED AS PERSONAL OR PERSONALLY IDENTIFIABLE INFORMATION UNDER AN APPLICABLE LAW ("**personal information**").
- That is about you but individually does not identify you, such as Usage Data.

This information includes:

- Information that you provide by filling in forms in the App. This includes information provided at the time of registering to use the App and requesting further services. We may also ask you for information when you report a problem with the App.
- Information received from Google APIs.
- User information we obtain from Torus.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the App. You may be required to provide financial information before completing certain transactions through the App.
- Biometric data, such as your fingerprint, when using the App.

Automatic Information Collection and Tracking

When you download, access, and use the App, it may use technology to automatically collect:

- Usage Data. When you access and use the App, we may automatically collect certain details of your access to and use of the App, including location data, and other communication data and the resources that you access and use on or through the App.
- Device Information. We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- Stored Information and Files. The App also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- Location Information. This App collects real-time information about the location of your device in order to provide the services associated with the App and to comply with certain laws.

If you do not want us to collect this information, do not download the App or delete it from your device.

We also may use these technologies to collect information about your activities over time and across third-party websites, apps, or other online services (behavioral tracking). Click here [INCLUDE LINK TO DO NOT TRACK DISCLOSURES] for information on how you can opt out of behavioral tracking on or through this app and how we respond to browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

- Cookies (or mobile cookies). A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.
- Web Beacons. Pages of the App may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).
- [WHAT OTHER TECHNOLOGIES DO WE USE FOR TRACKING?].

Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies to collect

information about you or your device. These third parties may include:

- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.
- Torus.

These third parties may use tracking technologies to collect information about you when you use this app. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. [For information about how you can opt out of receiving targeted advertising from many providers, see [Your Choices About Our Collection, Use, and Disclosure of Your Information](#).]

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the App and its contents, and any other information, products or services that you request from us.
- Fulfill any other purpose for which you provide it. For example, we may share your email address and openid to Torus to retrieve some user information from Torus and authenticate your account.
- Give you notices about your account.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including pursuant to our Terms of Service.
- Notify you when App updates are available, and of changes to any products or services we offer or provide through it.
- [OTHER USES].

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the App.

We use location information we collect to optimize your currency preference and to determine whether your use of this App is a violation of sanctions regimes that may be applicable to us.

Disclosure of Your Information

We may disclose aggregated information about our users[, and information that does not identify any individual [or device].] without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Code Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Code Inc. about our App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the App terms of service.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Code Inc., our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection

and anti-money laundering purposes.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. You can choose whether or not to allow the App to collect information through other tracking technologies by [IS THERE AN OPT-OUT METHOD]]. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the App may then be inaccessible or not function properly.
- **Location Information.** You can choose whether or not to allow the App to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of the App may become inaccessible or not function properly.

California residents may have additional personal information rights and choices. Please see [\[Your California Privacy Rights\]](#) for more information.

Accessing and Correcting Your Personal Information

You can review and change your personal information by logging into the App and visiting your account profile page.

You may also send us an email at [EMAIL ADDRESS] to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

California residents may have additional personal information rights and choices. Please see [\[Your California Privacy Rights\]](#) for more information.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, see California Consumer Privacy Act (CCPA) Rights below.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [EMAIL ADDRESS] or write us at: P.O. Box 39030, Columbia PO, Waterloo, ON N2T 0A7 CANADA.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

California Consumer Privacy Act (CCPA) Rights

If you are a California resident, the following rights as expressed under the California Consumer Privacy Act of 2018 ("CCPA") are applicable to you:

You may request that we disclose to you, free of charge (unless your requests are manifestly unfounded or excessive):

- the categories and specific pieces of personal information that we have collected in the preceding twelve (12) months;
- for personal information that we have collected in the preceding twelve (12) months, the categories of personal information that we have collected about you, the categories of sources from which the personal information was

collected, the business or commercial purpose for collecting or selling personal information, the categories of third parties with whom we share personal information, and the specific pieces of personal information we have collected about you;

- for personal information that we have sold or disclosed for a business purpose in the preceding twelve (12) months, the categories of personal information that we have collected about you, the categories of personal information that we have sold about you, the categories of third parties to whom the personal information was sold (by category or categories of personal information for each category of third parties to whom the personal information was sold), and the categories of personal information that we have disclosed about you for a business purpose.

To exercise the above right, you must provide a verifiable consumer request by either emailing us at [EMAIL ADDRESS] or by writing to us at the address below.

You may request that we delete personal information about you that we may have collected. To exercise this right, you must provide a verifiable consumer request by either emailing us at [EMAIL ADDRESS] or by writing to us at the address below.

If you are a California resident and you have questions regarding your rights under the CCPA, you can email us at [EMAIL ADDRESS] or write to us at: P.O. Box 39030, Columbia PO, Waterloo, ON N2T 0A7, CANADA.

European Economic Area Data Subject Rights

If you are a natural person residing within the European Economic Area (“**Data Subject**”), the following additional rights as expressed under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 known as the General Data Protection Regulations (“**GDPR**”) are applicable to you:

- **Personal Data:** For the purposes of this section, “Personal Data” means collectively PII, Unique Identifiers, Advertising Identifiers, and Location Data which you have provided to, or otherwise collected by, Code when you use and otherwise access this App.
- **Basis for Processing Data:** On certain occasions, Code relies on the consent of the Data Subject to process personal information. Data Subjects must be at least the age of 16 to consent to the processing of their Personal Data. Data Subjects under the age of 16 must obtain their parent's or legal guardian's permission to consent to the processing. In other occasions, we may process information when we need to do so to fulfill a contract, provide services or where we are required by law to do so. We may also process data when it is in our legitimate interests to do so and when these interests are not overridden by the Data Subject's data protection rights (which may vary based on the Data Subject's jurisdiction). Such legitimate interests include, but are not limited to, operation of our business and services, verifying user's identity, serving advertisement, improving products and services, analyzing performance, debugging, troubleshooting, and providing customer support.
- **Access:** You may access, correct, or modify the Personal Data you provided to Code and associated with your account. You may do so by contacting us as described below.
- **Forgotten:** You may request to have your Personal Data erased, or otherwise request that your Personal Data not be processed. Please note that this App, or parts of this App, may become inaccessible or otherwise not function properly if you request to have your Personal Data erased or not be processed. You may do so by contacting us as described below.
- **Object, Restrict, or Withdraw Consent:** You may withdraw consent you previously provided to Code or otherwise object to or restrict the processing of your Personal Data. Please note that this App, or parts of this App, may become inaccessible or otherwise not function properly if you withdraw certain consents or otherwise object to or restrict the processing of your Personal Data. You may do so by contacting us as described below.
- **Portability:** You may request to receive a copy of the Personal Data you have previously provided to us during your use of our Services. You may do so by contacting us as described below.
- **International Transfers:** Please be aware that the information we collect may be transferred to and maintained on servers or databases located outside your jurisdiction, where the privacy laws may not be as protective as those in your location. Please be advised that we may process and store information in Canada. The European Commission has recognized Canada as providing adequate protection under the Commission's adequacy decisions. We may also transfer information to third parties as described herein. In such cases, those third parties will be subject to and bound by other privacy framework and regulations, including the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce.
- **Supervisory Authority:** If you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority.

Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page with a notice that the privacy policy has been updated and notify you by an in-App alert the first time you use the App after we make the change.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this

privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, or to exercise your rights under the CCPA or GDPR, contact us at: [EMAIL@CODE.COM] or P.O. Box 39030, Columbia PO, Waterloo, ON N2T 0A7 CANADA.