

# Privacy Policy for the Datatrie Advisor

14 July, 2020

This Privacy Policy sets forth how Datatrie, Inc., and its related affiliates (collectively, “Datatrie”, “we,” or “us”) will collect, use and share information in connection with its Datatrie Advisor product (“the Product”), accessed through internet-capable hardware platforms including personal computers and mobile devices.

By using the Product, you agree to this Privacy Policy and our Terms of Service. This Privacy Policy applies to information submitted and collected online through the Product, and information that you may send to us in correspondence regarding your use of the Product.

We reserve the right to change the provisions of this Privacy Policy at any time. We will alert you that changes have been made by indicating on the Policy the date it was revised. We encourage you to review this Privacy Policy from time to time to make sure that you understand how any personal information you provide will be used. Your continued use of the Datatrie Advisor following the posting of changes to these terms will mean you accept those changes.

## 1. INFORMATION WE COLLECT

We may collect “Personal Information”, generally defined as information about you that can be used to contact or identify you, such as your name, e-mail address, country, or telephone number. Additionally, we may also collect information such as recent purchases, and preferences. This information may be associated with your Personal Information. Personal Information does not include aggregate information, which is data we collect about the activities of users of the Product, from which any Personal Information has been removed.

### (a) Personal information You Give Us Directly

As you interact with the Product, we may collect, store, and use information that you voluntarily provide to us. For example, when you are invited to write an e-mail to us, you may choose to provide certain identifying information, such as your name, e-mail address, and the date you made an in-app purchase for the Product. In addition, you may voluntarily submit Personal Information when you send us feedback or post on our social media pages.

### (b) Payment Information

We use third parties to manage the purchase of virtual items offered by the Product. We do not have access to (and thus do not collect or store) your credit card details or billing information. You acknowledge and agree that Datatrie will have no liability for or control over such third party company’s use or protection of your payment information.

### **(c) Technical Usage Information and Cookies**

Your use of the Product does not provide us with log data, browser cookies, or other information from tracking technologies.

### **(d) Customer Support Information**

When you ask for assistance from our customer support mechanism, we will collect and store the contact information you provide (generally your name and e-mail address), information about your Product activity, and your reference number. We will also store and use the correspondence and any information contained within.

## **2. HOW WE USE AND SHARE YOUR INFORMATION**

Datatrie does not share your Personal Information with third parties except as approved by you or as described in this Privacy Policy.

### **(a) To Provide, Manage, and Promote the Product**

We use the information we collect from and about users to provide the Product to you, including to analyse and improve the Product; to personalize your experience by delivering relevant content; to allow you to comment on the Product or participate in promotions; and to provide you with customer support and respond to inquiries.

We may combine Personal Information with other information and use this combination in an effort to improve your experience or to aggregate it with information collected from other users to improve or analyse our Product. This privacy policy in no way limits or restricts our collection and dissemination of aggregate information or of non-personal information.

### **(b) To Contact You**

We are committed to providing you with the best possible user experience and, therefore, one of the key uses of your Personal Information is to communicate with you. We may periodically contact you in connection with customer support inquiries, or to alert you as to the status of the Product. We may also contact you by e-mail for research purposes so that we can continually improve and update the Product based on your input.

If you want to stop receiving promotional materials from Datatrie, reply to any e-mail and include "UNSUBSCRIBE" in the subject line.

### **(c) To Others**

We do not disclose your Personal Information to any third parties except as stated in this Privacy Policy, as otherwise permitted by law, or as authorized by you.

We will ensure that any third party with whom we share user data, or any parent, subsidiary or other related entity with whom we share user data, will provide the same or equal protection

of user data as stated in this Privacy Policy and as required by the guidelines of any party managing the purchase of virtual items offered by the Product.

**(d) Legal Matters; Safety**

We may, without your consent, access and disclose your information, any communications sent or received by you, and any other information that we may have about you or your account as may be permitted or required by law (including, but not limited to, court order or subpoena), or to prevent or investigate suspected fraud, violations of our Terms of Service or this Privacy Policy, or activity that appears to us to be illegal or may expose us to legal liability. Additionally, we may disclose your information in situations that we believe to be emergencies involving potential threats to the physical safety of any person or property if we believe that your information in any way relates to that threat.

**(e) Sale or Transfer of Assets**

If Datatrie sells all or part of its business or makes a sale or transfer of its assets or is otherwise involved in a merger or transfer of all or a material part of its business, Datatrie may transfer your Personal Information to the party or parties involved in the transaction as part of that transaction.

**3. POLICY REGARDING CHILDREN**

The Product is not intended for children under the age of 13, and we do not knowingly collect Personal Information from children under 13 years of age. In the event that we learn that we have inadvertently gathered personal information from children under the age of 13, we will take commercially reasonable measures to promptly erase such information from our records. Parents should contact Datatrie immediately if they have any concerns. Please see the Contacting Us section below for further details.

**4. USER CONTROL AND RETENTION OF DATA**

We do not ask you to create a user account.

If you remove the Product, we may still retain certain information associated with your account for analytical purposes, recordkeeping purposes and integrity, as well as to prevent fraud, resolve disputes, enforce our Terms of Service or other policies, take actions we deem necessary due to technical and legal requirements and constraints related to the security, integrity and operation of the Product. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

You have the right to require us to delete any or all of your personal data, at any time, by contacting us (see Contacting Us).

## **5. SECURITY**

We have put in place reasonable technical and organizational measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, or disclosure. However, we do not guarantee, and explicitly disclaim any implied representation, warranty, or other promise, that unauthorized third parties will never be able to overcome those measures or use your Personal Information for improper purposes.

## **6. INTERNATIONAL USERS**

If you are using the Product from outside of Canada, by providing your information you are consenting to the transfer of your information to Canada for processing, storage and maintenance in accordance with this Privacy Policy and our Terms of Service Agreement. You are also consenting to the application of Canadian law in all matters concerning the Product. We process and store your information in Canada and your information may be stored on servers located outside your residential jurisdiction and which may have less stringent privacy practices than your own. If you access the Product from outside Canada, your usage of the Product constitutes consent to the transfer of your data outside of your country and to Canada.

## **7. CONTACTING US**

If you have any questions about this Privacy Policy, or the Product, please contact us at [info@datatrie.com](mailto:info@datatrie.com) or write to us at:

Attn: Customer Support  
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