

# Privacy Policy

18th April 2020

SECAI MARCHE inc. (“Company” or “We”) makes available retail programs through mobile and software applications (“Services”). This Privacy Policy describes how we collect, use, share and protect information in connection with the websites, mobile websites, mobile applications, browser applications and any other Services that refer or link to this Privacy Policy.

## 1. COLLECTION OF INFORMATION

We collect, process and use your information when you:

- Register for our Services or sign in to an existing account
- Visit our website(s)
- Access our application(s)
- Connect to our Services using third-party accounts, such as your email, social media or payment account(s)
- Contact us for support
- Participate in our retail campaign, promotion

The types of information you provide may include personal information. “Personal information” means information that can be used to identify you (whether alone or in combination). The personal information you may provide to us includes:

- First and last name
- Unique personal identifier
- Email address
- Mailing, billing and/or shipping address
- Phone number
- Payment information (such as payment account name, payment account number, payment card expiration date and billing address)
- Commercial information such as records of products or services purchased, obtained, or considered by you;
- How you connect to our Services, such as your IP address, unique device identifiers, device or session IDs and information regarding the network and connected hardware (e.g., computer or mobile device and carrier), and system configuration information
- Click-stream data (internet or other electronic information regarding you

browsing history, search history, the web page visited before you came to our website, length of visit and number of page views, click-stream data meaning the page-by-page paths you take as you browse through our services)

## 2. USAGE OF PERSONAL DATA

We may use information about you in the following ways.

### Manage Your Account

If you provide us personal information, we may use it to: (i) process your registration with our Services, including verifying whether your email address is active and valid and enrolling you into our programs; (ii) facilitate and manage your purchase transactions; (iii) track your shopping, deliver you rewards or payments and identify opportunities for rewards and/or offers; (iv) send you technical notices, updates, security alerts and administrative messages; (v) provide you member services regarding your account and reply to your questions, comments and requests; and (vi) comply with legal and regulatory provisions in force and with the competent judicial authorities in each geographical jurisdiction that the Company operates in. We may also use your information to assess risk and prevent fraud.

### Improve Our Services

We may process information through analyzing and monitoring usages and trends and performing statistical analyses to improve our Services and the websites, applications, marketing efforts and the products and services of our affiliates we recommend or offer to provide a better service to you in the future.

### Provide You Marketing Information

Company may use information to provide you more personalized offers and/or special offers, discounts and similar information. Company may send you newsletters, rewards, discounts, promotion codes, events and general information about the service if you consent.

### Administer Contests, Sweepstakes and Promotions

From time to time, Company may invite you to enter various contests, sweepstakes, surveys or promotions. If you choose to participate in a contest or promotion, your personal information may be used to administer the contest, such as to determine your eligibility for the contest or to award a prize

### 3. DISCLOSURE OF PERSONAL INFORMATION

We may disclose your Personal Data to third party service providers, agents, and other organizations we have engaged for the purpose as described in Section 2. Any updates made to your Personal data with us may not be updated with our third party service providers, agents, and other organizations. You are required to liaise with them separately.

We may also share your Personal Data to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, to protect the integrity of this Site, or to otherwise protect our rights.

### 4. RETENTION OF PERSONAL DATA

We take reasonable measures to protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We use a secure, encrypted connection (using a TLS protocol) on all pages where you access or transmit personal information. Although Company uses reasonable efforts to help protect your information, transmission via the Internet is not completely secure and Company cannot guarantee the security of your information collected through our Services. Except as otherwise set forth under applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access or other causes beyond our control. We retain the information collected via our Services until you choose to close your account. After that time, we may aggregate the data and retain it for analytical purposes. We may also retain your information on backup media to comply with applicable law, to support financial audits, to resolve disputes, to maintain compliance efforts and for other legitimate business reasons.

### 5. YOUR CHOICES

You may in some cases have the option to decline providing us information. However, your choice not to provide information may impact your use of certain features or services. You may unsubscribe by logging in to your account and updating your settings or by using the Contact Us option through the Services. Upon request, we will provide you with information about whether we hold any of your personal information. We encourage you to maintain the accuracy of the information you submit to us, such as the information you provide to register for

your account. The Services may allow you to access, review, correct, update and remove or make inaccessible personal information you have provided through your account settings. With respect to linked email accounts, you may unlink your email account from your Service account by updating or switching off the connection in your account settings within the service. You may provide account updates and changes by logging into your account and changing settings or by using the Contact Us option through the Services. We will make good-faith efforts to make requested changes in our then-active databases as soon as reasonably practicable.

#### 6. COOKIE POLICY

Our Site may contain links to other websites not maintained or related to use. This privacy policy only applies to our Site. You should therefore read the privacy policies of the other websites when you are using those websites

#### 7. THIRD-PARTY WEBSITES

The Services contain hyperlinks to websites of merchants, retailers and other websites or locations that we do not control and are operated and controlled by third parties (“Third-Party Websites”). Our Privacy Policy does not apply to these Third-Party Websites and we make no representations regarding the policies or business practices of any such Third-Party Websites. We encourage you to review, and if necessary, adjust, your privacy settings on the applicable Third Party Websites.

#### 8. CHANGES

We may review and update the necessary in this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

#### 9. CONTACT US

If you have questions about this Privacy Policy, please contact us by e-mail at [enquiries@secaimarche.com](mailto:enquiries@secaimarche.com)