

CURVE GENERAL PRIVACY POLICY

EFFECTIVE: June 1, 2018

Introduction and scope

1. We're CURVE CANADA LTD., a Canadian Corporation, 217 Speers Rd., Unit #4, Oakville, ON L6K 2E8, Canada ("CURVE"). This privacy policy tells you how we use personal information collected at this Platform. Please read this privacy policy before using the Platform or submitting any personal information. By using the Platform, you are accepting the practices described in this privacy policy. These practices may be changed, but any changes will be posted, and changes will only apply to activities and information on a going forward, not retroactive basis.
2. You are encouraged to review the privacy policy periodically to make sure that you understand how any personal information you provide will be used. The privacy practices set forth in this privacy policy are for this Platform only. If you link to other websites, please review the privacy policies posted at those sites.
3. Your online privacy and trust are very important to us, so we are providing this Privacy Policy to inform you of our practices involving data collection, use, and disclosure. This Privacy Policy applies to your personal data collected online by CURVE ("CURVE", "we", "us" and "our") through your use of its Platforms, products, applications and services.
4. If we say 'policy' we're talking about this privacy policy. If we say 'user terms' we're talking about the rules for using each of the Platforms. The rules vary by product and each product makes them separately available and seeks consent to them separately to this policy.

The type of personal information we collect

5. We collect certain personal information about visitors and users of our Platforms.
6. We collect personally identifiable information, like names, titles, email addresses, etc., when voluntarily submitted by our visitors or users. This information is only used to fulfill your specific request, unless you give us permission to use it in another manner, for example to add you to one of our mailing lists.

How we collect personal information

7. We collect personal information directly when you provide it to us, automatically as you navigate through the Platform, or through other people using our Platforms, or when you use services associated with the Platform.
8. We collect your personal information when you provide it to us when you complete the registration process, submit feedback, enter a contest, or fill out a survey.

How we use personal information

9. We will use your personal information:
 - a. Where this is necessary for purposes which are in our, legitimate interests. These interests include:
 - i. operating the Platforms;
 - ii. providing you with services described on the Platforms;
 - iii. verifying your identity when you register to any of our Platforms;
 - iv. updating you with operational news and information about our Platforms and services e.g. to notify you about changes to our Platforms, or security updates;

- v. carrying out technical analysis to determine how to improve the Platforms and services we provide;
 - vi. monitoring activity on the Platforms, e.g. to identify potential fraudulent activity and to ensure compliance with the user terms that apply to the Platforms;
 - vii. improving our products and services.
- b. For purposes which are required by law.
 - c. For responding to requests by government, a court of law, or law enforcement authority's investigation.

Distribution of collected information

- 10. We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (1) permitted or required by law; or, (2) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or, (3) investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes.

Cookie/tracking technology

- 11. The Platform may use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of visitors to the Platform, and understanding how visitors use the Platform. Cookies can also help customize the site for visitors. Personal information cannot be collected via cookies and other tracking technology, however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.
- 12. Type of information we may collect by cookies:
 - a) your IP address or proxy server IP address';
 - b) the domain name you requested;
 - c) the date and time of your visit to the Platform;
 - d) the length of your session;
 - e) the pages which you have accessed;
 - f) the number of times you access our Platform within any month;
 - g) the operating system which your computer uses.

How we keep your personal information secure

- 13. Commitment to Data Security: We store personal information on secure servers that are managed by us and our service providers, and occasionally hard copy files that are kept in a secure location in Canada. Personal information that we store or transmit is protected by security and access controls, including username and password authentication, and data encryption where appropriate.
- 14. Only authorized employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information. All emails and newsletters from this Platform allow you to opt out of further mailings.

How long we keep your personal information

- 15. We retain your personal information for as long as is necessary to provide the services to you and others, and to comply with our legal obligations. If you no longer want us to use your personal information or to provide you with the CURVE services, you can request that we erase your personal information and close your CURVE account.

16. If you request the erasure of your personal information we will retain information from deleted accounts as necessary for our legitimate business interests, to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of service and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.

When we need to update this policy

17. We will need to change this policy from time to time to make sure it stays up to date with the latest legal requirements and any changes to our privacy management practices.
18. When we do change the policy, we'll make sure to notify you about such changes, where required. A copy of the latest version of this policy will always be available on this page.

Copyright

19. All content included on this Platform, such as text, graphics, logos, button icons, images, audio clips, digital downloads, data compilations, and software, is the property of CURVE or its content suppliers and protected by Canada and international copyright laws. The compilation of all content on this Platform is the exclusive property of CURVE and protected by Canada and international copyright laws. All software used on this Platform is the property of CURVE or its software suppliers and protected by Canada and international copyright laws.

Contact information

20. If you have any questions about our privacy practices or the way in which we have been managing your personal information, please contact CURVE.

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