

## Privacy Policy

Protecting the individual's privacy is crucial to the future of business. We have created this privacy statement to demonstrate our firm commitment to the individual's right to data protection and privacy.

9470-9029 Québec Inc. ("Enviro18/SEE token") is committed to keeping your personal information in our possession or under our control in a confidential, accurate, secure and private manner. This Privacy Policy explains how we fulfill such commitments, including the manner in which Enviro18 collects, uses, discloses and otherwise treats your personal information made available to us through our mobile app and our website at [www.enviro18.io](http://www.enviro18.io), [www.enviro18.com](http://www.enviro18.com), [www.seetoken.io](http://www.seetoken.io). This includes any other interactions with any user specially the reader of this document.

Our Policy corresponds with the ten privacy principles outlined in Schedule 1 of **the Personal Information Protection and Electronic Documents Act** (Canada).

This Privacy Policy could be updated without previous. We strongly encourage you to refer to this Privacy Policy often for the latest information about our personal information practices related to your privacy.

By continuing to use at [www.enviro18.io](http://www.enviro18.io), [www.enviro18.com](http://www.enviro18.com), [www.seetoken.io](http://www.seetoken.io), you agree to this Privacy Policy. This Privacy Policy does not apply to third-party websites, products, or services, even if we provide links to them or they link to us.

Your privacy matters to us and we commit to protect your privacy at the best of our capacities.

### 1. ACCOUNTABILITY

Enviro18 is responsible for personal information under its control.

1.1 Accountability for Enviro18 compliance with the principles rests with The Holding company of Enviro18 and the person or persons designated by senior management as Privacy Officer when and if applicable, even though other individuals within the organization may be responsible for the day-to-day collection and processing of personal information. In addition,

other individuals within the organization may be delegated to act on behalf of the company or the Privacy Officer.

1.1 Enviro18 senior management has designated a Privacy Officer to oversee the organization's compliance with these privacy principles. Submissions to the Privacy Officer may be made in writing via email at **hello at Enviro18 dot io**, or via mail at the following address:

9470-9029 Québec Inc.  
c/o Privacy Officer  
1405 rue Graham-Bell  
Boucherville, Quebec.  
Canada.

1.2 Enviro18 has put in practice the following in order to protect your personal information;

- I. Company wide policies and procedures to protect client personal information.
- II. Procedures on how to respond to client questions and complaints related to their personal information.
- III. Strategies to inform clients and employees on how Enviro18 & See token protects, collects, uses and discloses personal information, including this Privacy Policy.
- IV. Employee training on the policies and procedures referenced in subparagraphs (a) and (b) above.

## 2. APPLICABLE PURPOSES

Enviro18 will identify the purposes for which personal information is collected at or before the time the information is collected.

2.1 Enviro18 collects personal information for the following primary purposes ("identified purposes"):

- (a) to provide our products and services, including to open and service your account and to verify your account and your identity;
- (b) to be able to facilitate electronic fund transfers to and from your account;
- (c) to maintain commercial relations and to communicate with you about your Enviro18 products and services (which will include, but not be limited to: billing, collection, notices for renewal of

services, of system upgrades, or any information relevant to your uses of Enviro18's products or services);

(d) to identify customer needs and/or preferences and deliver products and services that meet them;

(e) to comply with legal and regulatory requirements;

(f) to collect amounts owing to us (if and when applicable); and

(g) to administer and manage our business operations.

2.2 When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified prior to use. Unless the new purpose is required by law, Enviro18 will obtain your consent before information is used for that new purpose.

2.3 Enviro18 collects some user information using third-party analytics platforms. These platforms include but are not limited to Google Analytics, Branch, Yahoo, SEE Token, Facebook, Instagram, LinkedIn, Twitter, etc. These platforms help us understand how users use the Enviro18 platform and services, but none of this information identifies users personally. We use information collected this way to better understand the needs of the Enviro18 user base and the needs of the Enviro18 & See token platform. Enviro18 also uses the information gathered for statistical purposes such as to keep track of the number of website visitors and the specific pages users visit with a goal to introduce improvements to Enviro18 products and services generally.

2.4 Eventually emails could be sent to you and other type of communications about memberships, token events, new onboarded merchants and all type of products and services that we think may be of your interest. User can unsubscribe at any time from all type of communications the unsubscribe mechanisms provided in these communications. Please note that unsubscribing will not unsubscribe you from account or transactional documents which are delivered to you for non-marketing purposes.

### **3. CONSENT**

Except where otherwise permitted or required by law, we will obtain your informed consent to collect and retain your personal information. Express consent may be obtained verbally, electronically or in writing. Implied consent may be obtained through your use of a product or

service, or when you approach us to obtain information, inquire about or apply for products or services from us. Enviro18 will seek express consent when the information is likely to be considered sensitive.

In certain circumstances, personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information. Seeking consent may be impossible or inappropriate when there is an emergency threatening the individual's life, health or security, or where the individual is a minor, seriously ill, or mentally incapacitated. In other instances, information may be publicly available. Moreover, Enviro18 may provide personal information to its lawyer or agent to collect a debt, comply with a subpoena, warrant or other court order, government institution requesting the information upon lawful authority, or as may be otherwise required by law.

3.1 Enviro18 will generally seek consent for the use or disclosure of the information at the time of collection. In certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when Enviro18 wants to use information for a purpose not previously identified to you).

3.2 Enviro18 will not, as a condition of the supply of a product or service, require an individual to consent to the collection, use, or disclosure of information beyond that required to fulfill the explicitly specified and legitimate purposes.

3.3 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Enviro18 will inform the individual of the implications of such withdrawal. In order to withdraw consent, an individual must provide notice to Enviro18 in writing by contacting the Privacy Officer using the contact information provided under "1. Accountability".

3.4 With respect to personal information already collected by Enviro18 prior to the publication of this Privacy Policy, this Policy will constitute reasonable notice to Enviro18 current customers and employees of the purposes and uses for which such personal information has been collected. Should an individual object to these ongoing uses or disclosures, consent may be withdrawn upon providing notice to Enviro18 in writing and is subject to any legal requirements.

#### **4. LIMITING COLLECTION**

The collection of personal information will be limited to that which is necessary for the purposes identified by Enviro18, including under “2. Applicable Purposes”. Information will be collected by fair and lawful means.

4.1 The personal information that we may collect from you includes:

- I. contact information such as your name, address, email address and phone number;
- II. identifying information such as a screen name, account ID, or device ID;
- III. technical diagnostic data such as crash logs;
- IV. information about your past purchases of or using Enviro18 products and services;
- V. information about how you interact with our platforms, including taps, clicks, and similar information;
- VI. information about the transactions you have made using our products and services;
- VII. your approximate location;
- VIII. any ID or images that you choose to upload
- IX. other information that we may need in order to provide you with a product or service; and
- X. other information with your consent, or as permitted or required by law.

4.2 Enviro18 may also collect personal information from such third parties as credit bureaus KYC/AML, employers or personal references, or other third parties that represent that they have the right to disclose the information whenever needed.

4.3 In connection with its Internet business, Enviro18 may use a ‘Cookie’ to collect certain information which it uses to track user patterns on its platforms. A Cookie is a text file containing a unique identification number that identifies a user’s browser, but not a particular individual. Furthermore, Enviro18 does not use Cookies in combination with other information to obtain personally identifiable information. If an individual does not wish to use Cookies, he or she can reset their browser to either provide notification of or refuse to accept Cookies.

## **5. LIMITING USE, DISCLOSURE, AND RETENTION**

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as permitted or required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes, except as otherwise permitted or required by law.

5.1 Enviro18 may disclose your personal information to certain third parties, including to:

- I. a service provider involved in the development, promotion, marketing or enhancement of Enviro18 / See token products or services and that has agreed, by contract or otherwise, to treat your personal information in accordance with this Privacy Policy or an equivalent level of protection;
- II. emergency services in an emergency situation;
- III. other organizations or agents with whom you have arrangements and to whom you have provided consent directly; and
- IV. any other third-party, upon receiving your consent or as permitted or required by law.

5.2 Enviro18 may disclose an employee's personal information in the following circumstances:

- I. in the administration of that employee's benefits;
- II. in providing references to prospective employers, upon receiving the consent of the employee; and
- III. as may be permitted or required by law.

5.3 Certain Enviro18 employees may be given access to customer and/or employee information in so far as their duties require access for business purposes. Enviro18 employees are governed by a non-disclosure agreement prohibiting disclosure or use of any confidential or personal information for any purposes other than the stated business purposes.

5.4 Enviro18 will retain personal information for only as long as required to fulfill the identified purposes or as required by law. Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous according to the guidelines and procedures established by Enviro18.

5.5 An additional branch and some of our service providers may be located outside of Canada, including in the United States, and as such you acknowledge that your personal information may be accessible to governmental, national security and regulatory authorities in accordance with the laws of these jurisdictions.

## **6. ACCURACY**

Enviro18 ensures that personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used, including to minimize the possibility that inappropriate information may be used to make a decision about you.

6.1 You have the ability to correct or change your personal information in our records, such as your address and contact information. The process for changing your information begins in the account area of your control panel. You may change this information at any time and as often as necessary. If you need assistance or have questions about changing, updating or correcting information, you can contact us by submitting a request at support at enviro18 dot io

## **7. SAFEGUARDS**

Enviro18 protects personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification using security safeguards appropriate to the sensitivity of the information. The nature of the safeguards varies depending on the sensitivity of the information that has been collected, the amount, distribution and format of the information, and the method of storage.

7.1 Methods that Enviro18 uses to protect personal information include:

- (a) physical measures, such as locked filing cabinets and restricted access to offices;
- (b) organizational measures, such as security clearances and limiting access on a “need to know” basis; and
- (c) technological measures, such as the use of passwords and encryption.

7.2 Enviro18 employees are made aware of the importance of maintaining the confidentiality of personal information. Enviro18 employees are governed by a non-disclosure agreement prohibiting disclosure or use of any confidential or personal information for any purposes other than the stated business purposes.

7.3 Enviro18 uses care in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

## **8. TRANSPARENCY**

You may request access to more information about our privacy practices, and we will make it available to you in a manner that is easy to understand, including via this Privacy Policy. Such information may include the means of gaining access to personal information held by Enviro18 and a description of the types of information held by Enviro18 and/or its subsidiaries, including a general account of its use.

## **9. INDIVIDUAL ACCESS**

Subject to certain exceptions prescribed by law, upon written request, we will inform you of the existence, use, and disclosure of your personal information and will provide you with access to that information within 30 days or such other time period as may be permitted by applicable laws. You are entitled to challenge the accuracy and completeness of your personal information, such as your address and contact information, and to amend it or have it amended as appropriate.

9.1 The process for changing information begins in the password protected account area of the control panel, a 2FA or email confirmation. You may change this information at any time and as often as necessary. If assistance is needed, or for answers to questions about changing, updating or correcting information, please contact Enviro18 support by submitting a request at support at enviro18 dot io.

9.2 In certain instances, Enviro18 will not be able to provide you with access to your personal information, including where the information contains references to other individuals; where the information cannot be disclosed for legal, security or commercial proprietary reasons; or where the information is subject to solicitor-client or litigation privilege. In each case, Enviro18 will provide reasons for denying any access to personal information.

9.3 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, Enviro18 will amend the information as required. Where appropriate, the amended information will be transmitted to third-parties having access to the information in question.

9.4 When a challenge is not resolved to the satisfaction of the individual, Enviro18 will record the substance of the unresolved challenge. When appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

## **10. CHALLENGING OUR PRIVACY POLICY**

If you have questions or concerns about your personal information, please contact Enviro18's Privacy Officer by using the contact information provided under "1. Accountability".

If your concern remains unresolved by us, you may contact the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Quebec K1A 1H3

Internet: [www.priv.gc.ca](http://www.priv.gc.ca)

## UPDATES AND AMENDMENTS TO THIS POLICY

This Privacy Policy is effective as of November 1st, 2022. This Privacy Policy replaces any previous notices from Enviro18 about personal information collection, protection, use, sharing, retention, and privacy practices and applies to the use, sharing, and retention of personal information previously collected. However, this Privacy Policy does not supersede any application or account-specific terms and conditions you may have agreed to. Those terms must be read together with this Privacy Policy.

We may amend this Privacy Policy at any time, and if the changes are significant, a notice of revision will be sent to you via email along with a notice on our website at [www.Enviro18.io/privacy](http://www.Enviro18.io/privacy). It is your responsibility to review this Privacy Policy from time to time to be aware of any such changes. Please check back regularly for any changes and to ensure you are always informed of the personal information that we collect about you, how we use it, and the circumstances under which we may disclose it.