

## Privacy Policy for myPad

**Effective Date: November 4<sup>th</sup>, 2021**

This “Privacy Policy” explains how **IT4Merchant Solution LTD** (“**Company**” or “**we**”) collects, uses, discloses, and otherwise processes personal data on behalf of our customers – typically, merchants (any, a “**Merchant**”) – in connection with our application, **myPad**, which runs on the EZPOS Point of Sale system (“**EZPOS**”). This Privacy Policy does not apply to Company’s privacy practices in any other context. Company’s processing of personal data in connection with our application is governed by this Privacy Policy and our agreements with Merchants. In the event of any conflict between this Privacy Policy and a customer agreement, the customer agreement will control to the extent permitted by applicable law.

This Privacy Policy is not a substitute for any privacy policy that a Merchant may be required to provide to their customers, personnel, or other individuals.

### **Information We Collect**

We may collect personal data from or on behalf of Merchants. Merchants determine the scope of the personal data transferred to us or that we collect, and the information we receive may vary by Merchant. Typically, the information we collect on behalf of Merchants includes:

#### ***Information that we collect when a Merchant’s customers make a payment***

When a customer makes a payment via a EZPOS, we collect information about the transaction, which may include personal data. Information about transactions includes the payment card used, name associated with the payment card, the location of the merchant’s store, date and time of the transaction, transaction amount, and information about the goods or services purchased in the transaction.

#### ***Additional information Merchants’ customers provide through the EZPOS ancillary to a payment***

We may collect additional information ancillary to the payment. This information may include:

- Customers’ email address or phone number, such as when the customer chooses to receive an electronic receipt
- Customers’ marketing preferences, such as whether the customer wishes to receive marketing communications or newsletters
- Information about participating customers’ activity in a merchant loyalty program

- Customers' physical address, where needed for delivery of goods or services
- Other information the customer provides, such as birthdate, interests or preferences, reviews, and feedback

### ***Information that we collect about Merchants' personnel***

We may collect information about Merchants' personnel and interactions with the EZ POS, such as clock-in and clock-out time and tips earned.

Additional information that Merchants provide to us about their customers or personnel

Merchants may provide us with additional information directly, via access they grant to us, or otherwise. The types of information that merchants may provide to us about their customers include email addresses, phone numbers, and purchase history. The types of information that merchants may provide to us about their personnel include email addresses, phone numbers, shifts, and sales history.

### **How We Use the Information We Collect**

We use the personal data we collect for or on behalf of Merchants, to provide our services and the functionality of our application: Reordering the previous order

We may also use personal data for related internal purposes, including:

- To provide information about the application, such as important updates or changes to the application and security alerts
- To measure performance of and improve the application
- To respond to inquiries, complaints, and requests for customer support

In addition, Company may use personal data as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal processes, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern our application; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

### **How We Share Information**

We may share personal data that we collect with:

- The Merchant from whom or on whose behalf we collected the personal data
- The platform on which our application runs, the EZPOS. You may view Privacy Notice below.
- With third parties as a Merchant may direct
- With third party service providers that help us manage and improve the application
- With Company subsidiaries and corporate affiliates for the purposes described in this Privacy Policy or in our agreement with a Merchant

Company may disclose personal data to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal processes, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern our application; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Company may sell or transfer some or all of its business or assets, including your personal data, in connection with a business transaction (or potential business transaction) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

## **Your Rights and Choices**

### ***Data Subject Rights***

To the extent that applicable law provides individuals with rights pertaining to their personal information, such as to review and request changes to their personal information, individuals should contact the Merchant with any requests pertaining to the Merchant's use of our application. To the extent that company is responsible for responding to data subject rights requests under applicable law, individuals may contact. Company will assist a Merchant as applicable, in responding to such requests subject to our contract with a Merchant.

### ***Complaints***

If you have a complaint about our handling of personal data, you may contact us via the contact information provided below.

## **Updates**

We reserve the right to modify this Privacy Policy at any time. We will notify you of updates by updating the date of this Privacy Policy.

### **Contact Us**

You may contact us with any questions, comments, or complaints, about this Privacy Policy or our privacy practices via: 1128 Queen St. W., Mississauga, ON, L5H 4K2, Canada.