

## Privacy Policy

At OkeyLabs Inc. ("Okey"), your right to privacy is very important to us. We provide users with the ability to automatically log into their computers and accounts through proximity of their mobile device using Bluetooth™, provided the requisite Okey software is installed on such computers and mobile device. In order to provide you with our services effectively, we collect certain specific information from you, and we also automatically collect information and data relating to the usage of our services by all our users, including you. Because we are committed to protecting your privacy rights and the information you provide to us, we have developed this privacy policy. It explains how we will protect your information and describes how we will use and share it.

This policy is concerned with the protection of your personal information only. Personal information includes any data that can be used to identify you as an individual, including your name, income, personal opinion, interests, home contact information, identification numbers, user IDs, passwords, ethnic origin, and age. Under Canadian law, in a business context, personal information does not include the name, job title, business address, or business telephone number of any employee in an organization.

This policy describes the following practices:

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- Collecting information
- Sharing your personal information
- Maintaining your personal information

This privacy policy may change from time to time to reflect Okey's internal needs, customer feedback, or changes in applicable privacy legislation. Okey will post all such changes on our website, so please visit this page regularly.

NOTE: Okey software and services are not intended for children under the age of 13. We do not knowingly collect or maintain any personal information or non-personally-identifiable information from anyone under the age of 13 nor is any part of our website, software or service directed to children under the age of 13. We do not permit children under the age of 13 to become members of Okey – we will close any accounts used by such children and will remove and/or delete any personal information we believe was submitted by any child under the age of 13.

### **Collecting information**

In order to use the services provided by Okey, you will be required to provide specific information about yourself, such as your name and e-mail address, and account information for those accounts with which you wish to use Okey's services. We will always inform you when we need information that personally identifies you, and we will keep this information in strict confidence. Additionally, you may, on occasion, voluntarily provide Okey with information that can be classified as personal information – all such personal information will be stored and maintained in accordance with this privacy policy.

We collect information about you in the following ways:

#### **As part of your registration for Okey's software and services**

You will be provided with a user ID and a password, or the ability to create a user ID and/or password. This user ID and password information is kept confidential and stored securely by Okey.

#### **Automatically by Okey's software and services**

Okey's software and services contain features that automatically collect information from users, such as logs respecting computer and account access. We use this information in order to provide you with the services, and also to improve our services. Additionally, use of Okey's website and/or software may result in the collection of technical information such as your computer's IP address, operating system, browser name/version, the referring web page, requested page, date/time, and sometimes a "cookie" (which can be disabled using your browser preferences); such information is used to help us understand the overall usage pattern of our website and software.

#### **As part of your voluntary feedback to Okey**

You may have the ability to post information to Okey's website, such as comments and opinions. Please be advised that any personal information that you voluntarily post to any public forum or to any area where third parties may legally access it, will NOT be considered confidential in any way, and Okey will not have any obligation to protect it in a secured system or obtain your consent to its disclosure, as you will have made the decision to publicly post it. However, at your request, Okey will be happy to change it, remove it, or restrict access to it (subject to technical feasibility) in order to protect the integrity of the personal information.

#### **You contact Okey directly**

Customers and business partners often contact us directly. When you contact any Okey employee by telephone, e-mail, in person, or through our website, you will be asked to provide consent to the collection of personal information if your personal information will help us deliver the information, products, or services you require.

#### **You respond to communications from Okey**

From time to time, Okey may invite you to provide us with information for specific purposes, such as for support purposes. We may ask for this information through feedback features on our website or software; we may send out e-mail inviting feedback or offering products and services; or we may ask you for information concerning support of our products or services. Your response to these communications may require you to submit personal information and opinions, or computer and account information.

#### **Your information is obtained through a third party**

Occasionally, Okey will obtain information about you from third parties, such as mailing list providers, third party service providers, ISPs, or third party application or account providers. Third-party providers are responsible for obtaining consent for the release of personal information to us from those individuals identified on mailing lists, surveys, or through other collection methods.

### **Sharing your personal information**

Subject to any exceptions stated above in the collection of information section, should Okey collect any of your personal information, we will follow these practices regarding the distribution of that information.

#### **Your personal information is always protected**

Okey uses reasonable precautions to protect your personal information and store it securely. Access to your personal information is restricted to those personnel who need it, and Okey takes reasonable steps to prevent the unauthorized use or disclosure of your personal information.

Okey only uses and discloses your personal information if it helps us facilitate your needs, improve our products and services, meet legal and regulatory requirements, or — to the limited extent possible — manage our internal business operations. Additionally, if there are any disclosure or use restrictions in your consent to the collection of your personal information, Okey will abide by those restrictions (subject to the consent exceptions listed below).

Okey may combine your information with other information into an aggregate form, so your information no longer personally identifies you. We may then use such information to help us further develop our services, or disclose the aggregate information to third parties, so they can obtain an overall picture of Okey's products, services, customer sectors and/or usage patterns. You will not be identified as an individual in this aggregate information without your consent, nor will any of your specific computer identifiers or account information be shared to any third party without your consent.

#### **We only share your information with your consent**

Okey provides your information to third parties only for purposes to which you have consented, and, except as described below, we require such third parties to keep your information confidential.

In a few situations, Okey may be required to disclose your information without your prior consent. For example, Okey may disclose your information if we are required to do so by law, or if we believe in good faith that such disclosure is necessary to:

- comply with law or legal process
- protect and defend our rights and property, or the rights and property of a third party

- protect against misuse or unauthorized use of any of Okey's products, software, services, or other proprietary materials
- protect the personal safety of any person
- allow for a change of ownership of Okey and associated transfer of all personal information to the new owner of Okey – this does not affect the protection of your information under this Privacy Policy

Okey will always try to provide you with prior notice of such disclosure; however, such notice may not always be possible or reasonable given the circumstances.

Additionally, you may opt to request services from us that involve the participation of third parties, such as disclosure of your login history using Okey's services to your account provider. Your personal information will only be used to the limited extent necessary to provide the services that you have requested, or to which you have otherwise expressly agreed.

### **Maintaining your personal information**

Okey has established the following practices regarding the maintenance of your personal information.

#### **You can access and change your personal information at any time**

Sometimes, it will be necessary for you to update your personal information Okey has on file. For example, if you change your e-mail address, you can do so by logging into your account with Okey and changing the information yourself. Due to the way in which certain information is stored, it is not possible for you to obtain access to or change the statistical information that Okey stores pertaining to you, such as the number of times you have used the application. However, you may request that such information be destroyed, as described below.

#### **You can opt out of communications at any time**

Additionally, you always have the choice of whether you wish to receive information from Okey. In some cases, you may do so simply by changing the preferences in the software application through which Okey provides the services.

If you do choose to opt out of communications respecting products and services provided by Okey, you may not obtain all the benefits we could otherwise provide, such as updates or warnings. Okey will not have any liability to you for your loss of those benefits or any negative effects respecting your use of Okey's products or services.

#### **You can request that your personal information be destroyed at any time**

A situation may arise where you desire to have all of your personal information that is contained in Okey's records deleted or destroyed. If this is what you wish, please contact our Privacy Officer, who will take care of removing your personal information from all of Okey's records. You may be required to provide Okey with the relevant computer identifying information to assure such records are destroyed, as our files may not be searchable by name. Additionally, there may be situations where we are obligated to retain one archival copy of your information to allow us to comply with laws or respond to legal processes. We will inform you of all such situations, and will only use your retained personal information to the limited extent necessary to comply with such laws or respond to legal processes.

### **Contacting our Privacy Officer**

Okey welcomes your comments about this privacy policy, and we would be happy to provide any additional information you require. Please contact our Privacy Officer at:

***hello@okeylabs.com***

*This privacy policy supplements any agreements you already have with OkeyLabs Inc, such as your User Agreement, website terms and conditions, and any other software license agreement. Our privacy policy does not replace the terms of those agreements. By agreeing to those terms and using Okey's website, products, software and services, you are consenting to the collection and use of your personal information by OkeyLabs Inc. in accordance with this privacy policy. This policy was written in accordance with the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA).*