

PRIVACY POLICY

1. Overview

At Edufide, we care deeply about protecting your privacy. This policy describes the type of information Edufide (“Edufide”, “We” or “Us”) may collect from you or that you may provide when you visit and utilize the services available through our website located at <https://www.edufide.com/> (the “Site”) and Applications (the “Applications”) collectively called “Edufide Services”, the “Services”, or the “Service”. This includes our practices for collecting, using, maintaining, protecting, and disclosing that information and the basis for doing so.

This policy applies to information we collect on the Edufide Site and Applications, in e-mail, text and other electronic messages between you and Edufide and, through mobile and desktop applications you download so as to access the Services (such as the iOS App Store or Google Play Store), which provide dedicated non-browser-based interaction between you and Edufide.

This Privacy Policy does not apply to any third-party websites, services, or applications, even if they are accessible through our Services. Also, please note that, unless we define a term in this Privacy Policy, all capitalized terms used in this Privacy Policy have the same meanings as in our Terms of Service. So, please make sure that you have read and understood our Terms of Service.

We reserve the right to make changes to this privacy policy at any time by giving notice on this page and/or within the Applications and/or sending a notice to you via any contact information available to us. It is strongly recommended to check this page often, referring to the date of the last modification listed at the top.

By using any of our Services, or by providing us your personal information, you agree to this Privacy Policy and agree to be bound by our Terms of Service. If you do not agree with the terms in this Privacy Policy, please do not provide us your personal information or use our Services.

2. Collection and Use of Personal Data

Edufide relies on a number of legal bases to collect, use, share, and otherwise process the Personal Information we have about you for the purposes described in this Privacy Policy. Generally, this includes analytics, user database management, managing support and contact requests, transaction aggregation, hosting and backend infrastructure and infrastructure monitoring. We may use personal data we collect from and about you for a variety of business purposes, including to:

We use Personal Information for the following purposes:

- a) in order to provide the Services and fulfill our obligations pursuant to the Terms of Service. For example, we cannot provide our Services without an email address to sign into your account, conduct customer support, or send educational materials; we

cannot provide the service without Users providing financial information on which a budget is based;

- b) where necessary to comply with a legal obligation, a court order, or to exercise and defend legal claims;
- c) to protect your vital interests, or those of others, such as in the case of emergencies;
- d) where you have made the information public;
- e) where necessary in the public interest;
- f) where necessary for the purposes of Edufide's or a third party's legitimate interests, such as those of visitors, members or partners;
- g) where you provide consent (for example, to join email mailing lists); and
- h) for our legitimate interest in:
 - a. providing a quality Service and in improving that Service;
 - b. ensuring the Services are secure;
 - c. protection against fraud, spam, abuse, etc.; and
 - d. understanding how Customers and Visitors interact with our Services, so that we can continuously improve the experience and effectiveness of doing so.

3. Categories of Personal Information we collect

We collect information about you, including information that directly or indirectly identifies you, through your use of Edufide. We do so:

- a) when you provide the information, through filling out forms or otherwise providing information on our Site and Applications;
- b) when you use location services to record transactions in our mobile Applications;
- c) when you correspond with us to receive customer support via email or chat.

The Personal information we may collect from you includes:

- a) Your email address that you provide to us as a username or that is provided to us by your social media account(s) if you use those for sign-in.
- b) Your IP address when you interact with our Site and Applications.
- c) Your location when you record a transaction in our mobile applications and have previously activated location services.
- d) Records and copies of your correspondence (including e-mail addresses different than that used to establish your account), if you contact us.
- e) Your responses to surveys that we might ask you to complete for research purposes.
- f) Details of transactions you carry out through our Site and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Site.
- g) Information that you provide by filling in forms on our Site. This includes information provided at the time of registering to use our Services, subscribing to our Service, or requesting further Services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Service.
- h) To provide you with customer support or service offerings, including responding to and resolving your inquiries and requests via email or text-based chat. When you request assistance from our customer support team with respect to importing

third-party financial account data, to allow a customer support representative to review a limited amount of data from recent transactions for the sole purpose of facilitating technical implementation of the account aggregation services. When asked to do so by you, our customer support representative may utilize that transaction data on your behalf in interactions with third-party financial account providers intended to facilitate implementation of requested account aggregation within our Services.

4. Sharing of Personal Information

We do not share your personal data except in the limited circumstances described here. We may share your personal data with:

- a) Contractors, service providers, and other third parties we use to support our business, in particular providing infrastructure and analytics services, and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- b) A buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by us about our Site Users is among the assets transferred.
- c) To fulfill the purpose for which you provide it.
- d) In aggregated form, and/or information that does not identify any individual.
- e) For any other purpose disclosed by us when you provide the information.
- f) With your consent.
- g) To comply with any court order, law or legal process, including responding to any government or regulatory request.
- h) To enforce or apply our Terms of Service or terms of sale and other agreements, including for billing and collection purposes.
- i) If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Spare, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. Cookies & Similar Technologies

We, or third-party service providers acting on our behalf, may use cookies or web beacons on our Site. A cookie is a small text file that may be stored on the hard drive of your computer when you access the site. A web beacon is an electronic image used to recognize a cookie on your computer when you view a web page. We may use cookies and web beacons to collect non-personal data from you, including your IP address, browser type, the time and length of your visit, the pages of the site you visit and other clickstream data. This information may be used in order to:

- a) recognize you when you return to the site;
- b) improve and personalize your experience on our site;
- c) provide you with customized advertising; and
- d) monitor site usage and analyze the behavior of site visitors.

We do not collect any personal information through our use of cookies and web beacons, and we do not combine the non-personal information we collect through them with any of your personal information. You may decline cookies, but by doing so, you may not be able to use certain features on our site. You also may be able to make some web beacons unusable by rejecting cookies. Check the “Help” menu of your browser to learn how to change your cookie preferences.

6. Disabling Cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Website.

7. Categories of Third-Party Providers

Categories of services used to process data include:

i. Infrastructure & Fulfillment

Edufide partners with third-parties to provide storage and server access that acts as infrastructure for our Site and Applications. In addition, we partner with third-parties to fulfill payments and transactions in fulfillment of our terms.

ii. Analytics

We partner with third-parties to help us monitor and analyze Site traffic and can be used to keep track of User behavior, helping us to improve the services and experience of using them.

iii. Customer Support

We partner with third-parties to help us receive, process, and respond to customer support requests, as customer support and education are a core part of the services offered.

iv. Performance and Logging

We partner with third-parties that assist us in monitoring the stability of the Site and Applications and resolving issues or errors with the service.

v. Marketing

We partner with third-parties to manage receipt of consent to send marketing emails and sending those same emails.

8. Data Retention

We retain account data for a period of time after an account expires, whether through trial expiration or subscription expiration, unless you delete your account as described below.

Once an account has become inactive beyond the period of time described below, we will delete its budget data – if you don't need Edufide, we don't need your account data, and you probably don't want us to have it. (Keep in mind that if you cancel your account, it remains active until the end of your subscription. The timeline below doesn't start until that subscription expires.)

We will delete accounts and their data:

- a) For an expired trial, a minimum of one hundred-twenty (120) days after the expiration of the trial;
- b) For an expired subscription, a minimum of three years after the expiration of the subscription.

After deletion, we retain your email address in order to be able to confirm deletion of associated data.

9. Automated Data Processing

In conjunction with a third-party payment processor, we use automated analysis to screen for suspicious or fraudulent transactions.

When we make solely automated decisions that affect you in a legal or a significant way, you have the right to provide your point of view and have those decisions reviewed by a member of our staff.

10. Third Party Sites

This Privacy Policy only addresses the collection, processing and use (including disclosure) of data by us. This Site may contain various links to third-party websites. These sites may provide additional information, goods, services and/or promotions. These sites are owned and operated independently of Edufide, and have their own separate privacy and data collection practices. Any information you provide to these sites will be governed under the terms of their privacy policy, if any. Edufide has no responsibility or liability whatsoever for the independent actions or policies of these independent sites, and is not responsible for the content or privacy practices of such sites.

11. Our Policy on Children

Our Website is not intended for children under 13 years of age (or 16 years of age for those who habitually reside in the EU, which applies to the remainder of the paragraph that follows). No one under these ages may provide any Personal Information to the Website. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not use or provide any information on this Site or on or through any of its features, register on the Site, make any purchases through the Site, use any of the interactive or public comment features of this Site or provide any information about yourself to us, including

your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@edufide.com

12. Your Rights

We have established a number of procedures to help you manage your Personal Information.

- a) **Opt-out.** You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) automated decision-making and/or profiling; (iii) our collection of sensitive personal data; (iv) any new processing of your personal data that we may carry out beyond the original purpose; or (v) the transfer of your personal data outside the EEA. Please note that your use of some of the Site may be ineffective upon opt-out.
- b) **Access.** You may access the information we hold about you at any time via your profile/account or by contacting us directly.
- c) **Amend.** You can also contact us to update or correct any inaccuracies in your Personal Information.
- d) **Move.** Your Personal Information is portable i.e. you have the flexibility to move your data to other service providers as you wish.
- e) **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us. In your request, please make clear: (i) **what** Personal Information is concerned; and (ii) **which of the above rights** you would like to enforce. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

13. California Privacy Rights

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from our systems.

14. EU Visitors and Customers' Rights

Rights to access, deletion, portability, and restriction are described above. In addition, if you habitually reside in the EU and wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority.

15. International Data Transfer

Your information, including Personal Information that we collect from you, may be transferred to, stored at and processed by us outside the country in which you reside, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By accepting this Policy, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

16. Security

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us.

17. Contact Information

We welcome your comments or questions about this Privacy Policy. You may contact us in writing at privacy@edufide.com

Or
Telephone Number : 1 833 EDU FIDE (1 833 338 3433)
and/or

Postal Address:

11 Ave and 59A St SW
Edmonton, Ab T6X0T2
Canada