

PRIVACY POLICY

Effective Date: November 15th 2021

You should read this Privacy Policy (the “Privacy Policy”) carefully, as it governs use of Personal Information in relation to the Platform’s services. All capitalized terms not defined herein have the meaning ascribed to them in the Terms and Conditions.

Triyo Software Inc. (hereinafter “Triyo”, the “Company”, “we”, “us”, or “our”) is the provider of websites, including triyosoft.com, as well as of a collaboration platform and software, products and services relating thereto (collectively the “Platform”). This Privacy Policy is a legal agreement between you and Triyo. The term “you” refers to the person or entity utilizing the Platform.

You must use the Platform, other than the website, on behalf of an organization that is our customer (the “Customer”), and you must be above the age majority in your applicable jurisdiction. Each Customer must have an order in place between the Customer and us, which may set out the parameters of use of the Platform by its end user, including but not limited to the maximum number of users who can use the Platform on behalf of that Customer. You may use the Platform for the Customer and other customers who permit you to use the Platform on their behalf (the “Other Customers”), but each activity of use of the Platform must be on behalf of the Customer or a single Other Customer.

Triyo is committed to collecting, using and distributing Personal Information responsibly and in accordance with this Privacy Policy. This Privacy Policy explains how we treat personally identifiable information and non-personal information that is collected in connection with your activities relating to the Platform.

This Privacy Policy also explains how you can direct questions about our privacy practices to our Privacy Officer, and how you can review and update your Personal Information for our Platform.

If you do not consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy when utilizing the Platform, do not provide us with any Personal Information. It is important to note that some features and services on the Platform can only be provided if we receive appropriate and required Personal Information.

You agree that this Privacy Policy is the equivalent of a written paper agreement between you and us. By agreeing to this Privacy Policy you are also agreeing to the Terms and Conditions at https://triyo.io/documents/terms_and_conditions.pdf.

If you are not resident in Canada and/or are located of Canada, you bear all responsibility for ensuring that your use of the Platform is compliant with all applicable laws. Despite being a resident of Canada, at any time you use the Platform outside of Canada, you bear all responsibility for ensuring that the use of the Platform is compliant with the applicable laws of that jurisdiction.

We reserve the right at any time and from time-to-time to modify, edit and update the Privacy Policy and we shall do so unfettered and at our sole discretion. You should review the Privacy Policy regularly to make sure that you are aware of any changes. Your access to use of the Platform on and after the date on which we post the revised terms constitutes your acceptance of the Privacy Policy as revised.

PERSONAL INFORMATION

For the purposes of this Privacy Policy, the term “Personal Information” means any information that is defined to be personal information under applicable Canadian privacy laws. Usually, this refers to any information about an identifiable individual or any information that can be used to identify an individual.

Personal Information may include, for example, your name, home address, gender, race, national or ethnic origin, religion, age, marital status, medical, education or employment history, financial information, DNA, and identifying numbers such as your social insurance number, or driver’s licence.

In most circumstances, Personal Information does not include the business contact information of a representative of an organization, such as the representative’s name, position or title, business address, business telephone number or business fax number. Publicly available information, such as information in a public directory, is not Personal Information under this Privacy Policy.

INFORMATION COLLECTED & USES

In the course of providing the Platform services, we may collect Personal Information and other information from you or relating to you.

Personal Information is collected by us when you choose to provide it to us. Some examples of such collection are provided herein, but these do not represent an exhaustive list of possible collection of Personal Information from you.

We collect Personal Information from you when you register or set up an account for the Platform. Also, if you choose to contact us either via telephone, email, our website or the Platform, we may keep a record of that phone call, correspondence and/or website visit which may contain Personal Information.

We may also receive Personal Information relating to you from our business partners and other third parties. For example, we will receive such information if you have provided consent for them to share such information with us.

We further may collect, disclose, access, transfer, process, store, use, or otherwise handle Personal Information for the purposes identified at the time of collection, as otherwise permitted or required by applicable law, or for any of the following purposes, without limitation:

- To receive and process your comments about our business or the Platform, and for other business activities;
- To provide access to the Platform;
- To comply with our legal obligations and regulatory requirements;
- To provide information to anyone working with or for Triyo as needed for the provision of the Platform, such as our agents, suppliers or service providers;
- To develop and manage our business and operations, including but not limited to for billing, accounting and debt collection services relating to the Platform;

- To establish, maintain and manage our relationships with users of the Platform;
- To respond to questions and concerns of users;
- To detect and protect Triyo and third parties from error, negligence, breach of contract, fraud, theft or other illegal activity, and which may include sharing Personal Information with our insurers, and to otherwise communicate with our insurers;
- To review potential fraud and as required in the course of activities to achieve credit risk reduction;
- To generate, maintain, and utilize (as required to provide the Platform services) a user's account within the Platform;
- To generate analytics and statistical data;
- To provide you with information you have requested from us, for example, we may, from time-to-time, use your Personal Information to contact you about changes or enhancements related to the Platform;
- to send you materials via email about products and services that we feel may be of interest to you (if you no longer want to subscribe to our emailed materials, you may do so by clicking unsubscribe at the bottom of the particular email. It typically takes 5 business days for complete removal); and
- For any other purpose for which Triyo has your consent.

CONSENT

Privacy legislation requires Triyo to obtain the consent of an individual to the collection, use or disclosure of Personal Information in many circumstances.

By providing your Personal Information via the Platform or directly to us, you agree that we may collect, disclose, access, transfer, process, store, use, or otherwise handle your Personal Information in accordance with this Privacy Policy and as otherwise permitted or required by law, and that we may access, transfer, process, store, use or otherwise handle your Personal Information in Canada, or outside Canada (where such Personal Information may be subject to the laws of the jurisdiction where it is so accessed, transferred, processed, stored or otherwise handled).

When we receive Personal Information from you for the purposes of providing you with any Platform services, or for other uses identified herein, you are providing us with consent as follows:

1. to allow us to deal with that Personal Information in a reasonable manner;
2. to allow us to provide your Personal Information to third parties we engage to provide or support the Platform;
3. to allow us to access, transfer, process, store, use and otherwise handle your Personal Information for the purpose of providing you with the Platform; and

4. to allow us to access, transfer, process, store, use and otherwise handle your Personal Information outside of Canada (whereby your Personal Information will be treated in accordance with applicable foreign laws) for the purpose of accessing, transferring, processing, storing, using and otherwise handling of your Personal Information by Triyo or otherwise for the Platform, and by any third party service provider engaged to access, transfer, process, store, use and otherwise handle your Personal Information on behalf of Triyo or in relation to the Platform, including third party services provider that controls a server where such Personal Information is accessed, transferred, processed, stored, used or otherwise handled, as required by Triyo thereof for the Platform.

If you need to provide us with Personal Information about anyone other than yourself, you represent and warrant to us that, where required by law and prior to your disclosure to us, you will obtain the consent of each individual to the collection, disclosure, access, transfer, processing, storage, usage and other handling by us and out third party service providers of such Personal Information for at least the purpose(s) set out herein.

Providing us with your Personal Information is always your choice. When you make any request of us or utilize any Platform element, we ask that you provide information that enables us to respond to your request and/or provide you with such Platform element. In doing so, you consent to our collection, disclosure, access, transfer, processing, storage, usage, or other handling of such Personal information by us and appropriate third parties for these purposes.

If we sell our organization or merge with another party, or engage in corporate restructuring or other corporate functions, your consent is hereby provided, and will be otherwise implied, to transfer your information, including Personal Information, to our successor for the same purposes as set out in this Privacy Policy.

CONSENT EXCEPTIONS

There are legal exceptions where we will not need to obtain consent or explain the purposes for the collection, use or disclosure of Personal Information. Some examples of situations where consent is not required include an emergency that threatens the life, health or security of an individual, or if we must comply with a court order or governmental order.

We may use Personal Information without your knowledge or consent in limited circumstances whereby we are required to provide Personal Information to third parties for legal or regulatory purposes. For example, under certain exceptional circumstance we may have a legal duty or right to disclose Personal Information without your knowledge or consent. Various government agencies and law enforcement, have the authority to review our files and interview our staff when deemed necessary. These agencies have their own strict privacy obligations.

CHILDREN

Triyo does not actively or knowingly collect Personal Information from children or anyone below the age majority in their applicable jurisdiction. We are committed to protecting the privacy of children. If Personal Information has been collected inadvertently from a child, the guardian of the child may contact us for the purpose of deleting this information. If we believe any person under the age of majority in his or her jurisdiction of residence is using the Platform we will not process any Personal Information of that person and may terminate that person's account or ability to access or use the Platform.

LIMITED COLLECTION, USE, DISCLOSURE AND RETENTION

We will only collect Personal Information that is deemed necessary to meet the purpose for which such Personal Information is collected. We will only use your Personal Information in accordance with this Privacy Policy. Triyo does not sell or disclose Personal Information to third parties, other than in compliance with this Privacy Policy and as required to satisfy any law, regulation, legal request, to protect its business interests, and to co-operate with any law enforcement investigation or on matters concerning public policy and safety.

NON-PERSONAL INFORMATION & ANONYMIZATION

We may also collect non-personal information from or about you, being information that does not identify an individual. Examples of non-personal information we may collect include, but are not limited to, business information and document tracking information (e.g., the time when a document is checked-out or checked-in, the amount of time spent within a document, etc.). Other non-personal information may be collected or derived by us in the course of operating the Platform.

We may also generate anonymized data. Anonymized data will not include any information that specifically identifies an individual.

We may further generate aggregated data. Aggregated data is formed of a collection of information pertaining to multiple individuals, and including, but not limited to, the number of visitors to the Platform, the number of users of documents, and average time spent on any services provided by the Platform, the location of users, etc.

SAFEGUARDING PERSONAL INFORMATION

We employ reasonable physical, electronic and procedural safeguards that are designed to protect our systems, Platform, and Personal Information under our control against unauthorized access and use. In accordance with appropriate industry standards in Canada, all safety and security measures are appropriate to the sensitivity level of the information collected. At Triyo's sole discretion, our safeguards may be subjected to penetration-testing at scale, and our system may be monitored and validated by third parties.

Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your information. Moreover, we cannot guarantee that measures we have implemented to prevent theft and loss, unauthorized access, disclosure, use, modification, transfer, or modification of Personal Information will achieve absolute security for your Personal Information.

We may engage third party external servers as well as other external services, including cloud services, cloud compatible servers, and/or payment processing services, and we do not have any control over such external servers or services.

You will bear full responsibility for the storage, maintenance, control and protection for all Personal Information and other information and data that is processed or otherwise utilized by the Platform. We bear no responsibility for such Personal Information and other information and data whatsoever.

LINKS TO OTHER SITES

Our Services may contain links to other websites and services of third parties. While we try to link only to websites and services that share our high standards and respect for privacy, we cannot say for sure if this is the case. As such, Triyo Services is not responsible whatsoever for

the content of, or the privacy practices employed by, other third party entities, their websites or their services. Any use by you of such links and services is at your sole risk and liability.

THIRD PARTY SERVICE PROVIDERS

We may engage third party service providers to assist with the provision of Platform services. For example, third party service providers may store Personal Information and other information, may provide services via their platforms, and if we obtain your credit card information, we may employ third party payment processors receive payment information and process payments.

Triyo shall not be responsible for the activities of any third party service providers and such third party service providers may require you to agree and comply with their terms, conditions and policies. You bear all responsibility and liability relating to such term, conditions and policies and your compliance therewith. We further do not bear any responsibility or liability for any Personal Information or other information you provide to such third party service providers.

DISCLAIMER

While we will take steps to protect your Personal Information, Triyo cannot guarantee the security of any information, including Personal Information, you transmit to us. Triyo will not be responsible whatsoever for the inadvertent disclosure of your Personal Information or theft of your Personal Information. Consequently, Triyo, its affiliates, related companies and arm's length companies and any directors, officers, employees, agents do not provide any representation, warranty or guarantee that your Personal Information will be protected against misuse, loss or modification. **We do not accept and do not bear any liability for the security of your, or any other person's, Personal Information.**

PRIVACY AND THE PLATFORM:

Each time the Platform is utilized by a user, our web server or other tools may collect and log certain information in access logs. Such access logs may be kept for a reasonable period of time. Such access logs may include, but not be limited to, information such as the following: files you access, documents you access, the date and time of any such access, and other information pertaining to your activities relating to the Platform. These logs are used solely for performance, site administration and security reviews. They are not sold or shared in any way to third party organizations. We may use this non-personal information to optimize the Platform and for other purposes relating to our business, products and services.

By accessing and browsing the Platform you agree that Triyo, or any third party it engages or that assists it, may collect, disclose, access, transfer, process, store, use, or otherwise handle any information collected about you through the Platform or that you provide to us through the Platform, as described in this Privacy Policy.

COOKIE POLICY

We may, from time to time, use "cookies" solely for security and authentication purposes. Triyo may use cookies to calculate Platform usage and improve the operation and performance of our services. Cookies also allow us to set preferences for you so that you may not have to re-enter them the next time you visit our Platform.

Most platforms use cookies in order to make them work, or to work more efficiently, as well as to collect information for the owners of the platform. They assist in the understanding of how users

access and use platforms, so the owner of the platform can develop and improve the design, layout, content and function of the platform and related services.

Cookies are small text files that a platform saves on your computing device when you visit the platform. It saves and retrieves pieces of information about your visit to the platform. It can enable the platform to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the platform.

On our Platform, cookies can be set by us (first party cookies) or by our partners (third party cookies).

We set the following cookies for the purposes set out below:

Cookie	Name	Purpose
triyo-token-addin	Triyo Add-In	This cookie is written to help with the user authentication and log in the user automatically in the Triyo Office Web Add-in (if the user chooses to do so).
triyo-token-app	Triyo Web	This cookie is written to help with the user authentication and log in the user automatically in the Triyo Web Application (if the user chooses to do so).

The following major third-party analytics services (among others) may set cookies and have access to your IP address based upon your use of our website:

Cookie	Name	Purpose
-	-	-

We cannot provide the names and purposes of the third party cookies as we do not have access to that information, however they are necessary for us to provide our Platform. These third parties face serious consequences if they are in breach of applicable privacy laws.

If you are uncomfortable with the use of cookies, you can disable cookies on the Platform by changing the settings in the preferences or options menu. However, please be aware that if you do delete and block all cookies parts of the Platform may not then work. This is because some of the cookies we use are essential for parts of the Platform to operate.

If you do not wish to accept cookies from the Platform, please leave the Platform immediately and then delete and block all cookies from the Platform.

ACCURACY

While Triyo collects the Personal Information that you supply, it does so with the understanding that any such information that you supply is accurate. It is important to us that your Personal Information held by us is accurate and complete. Having accurate information about you enables us to provide you with better products and services. You can help us keep Personal Information up-to-date by keeping us informed of any changes, such as a change of address, telephone number or any other circumstances. We will not be able to provide you with any notices if we do not have accurate contact information for you and we will bear no responsibility for any action or omission as a result of our lack of accurate contact information for you.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

The amount of time we will retain Personal Information varies, depending on the services we have provided and the nature of the Personal Information that we hold. We retain Personal Information for such period of time as is necessary for us to maintain sufficient information so we may respond to any issues that arise at a later date or as is required by law.

When Personal Information is no longer required by us or by law, we will either convert it into an anonymized form or an aggregated non-identifying form, or we will appropriately destroy or erase the Personal Information in a manner that is in accordance with our current policies and procedures.

ACCESS AND CORRECTION

We recognize that you may have the right to access your Personal Information in accordance with applicable laws. Any access request must be made in writing to: privacy@triyo.io

We may charge a reasonable fee for providing information in response to an access request, and, upon request, we will provide an estimate of any such fee upon receiving a request to access information. We may require a deposit for all or part of the fee.

Where applicable or permitted, we will make the information available within 30 days or provide written notice when we require additional time to respond to a request for access to information.

In some situations, we may not be able to provide access to certain Personal Information as the right to access Personal Information is not absolute. If we do not provide you with the requested information, we will notify you in writing and explain our reason(s) for not fulfilling your request.

If you are unsure whether we have a record containing any of your Personal Information and would like to confirm the same, please send an email indicating all email addresses that you may have given us. We will endeavour to respond to you within 5 business days and correct any errors.

If you decide at any time that you do not want to receive any email materials to which you have subscribed, you may choose to unsubscribe to these emails by following the instructions at the end of the email message. Alternatively, you can contact us by email or by phone. We will endeavour to respond to you within five (5) business days.

WITHDRAWAL OF CONSENT

You may, at any time, withdraw your consent to Triyo's collection, use and disclosure of your Personal Information, subject to reasonable notice and any legal and/or contractual restrictions.

Should you choose to withdraw your consent, Triyo may be unable to provide, or continue to provide, the Platform or elements of the Platform that can only be provided if we receive appropriate and required Personal Information.

SENSITIVE DATA

We request that you do not send us any sensitive data, including but not limited to, social insurance or other identification numbers, credit card or other payment details, information related to racial or ethnic origin, political opinions, religious beliefs, health data, criminal background or trade union membership information, unless we explicitly request such information. In accordance with applicable privacy laws, the sensitivity of data may be determined based upon context, or by other measures. If you do send us sensitive data then you are consenting to its processing in accordance with this Privacy Policy.

PRIVACY CONCERNS

Triyo will respond to questions and concerns relating to our Personal Information handling practices and this Privacy Policy. Please email such questions to: privacy@triyo.io

CONTACT INFORMATION

Please contact Triyo to obtain further information about our policies and procedures, to seek access to Personal Information we may have about you, or if you have any unresolved inquiries or concerns. We will respond to you promptly and try to resolve your concerns. We may need to ask you for Personal Information to verify your identity. We can be contacted at: privacy@triyo.io or call us at (718) 473-7085.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is in force and effective as of the date you start to use the Platform or you otherwise register or set-up an account with us, or if you are an organization, the date when you enter a subscription or other agreement with us for use of the Platform by you and your users.

Triyo reserves the right to change this Privacy Policy, and any of our policies and procedures concerning our practices for handling Personal Information, at any time and without any prior notice. If we have modified or amended our Privacy Policy, we will post the most current version on our website. Any changes that are made to this Privacy Policy will apply to both any Personal Information that we hold prior to the effective date of the amended Privacy Policy and any Personal Information that we collect on or after such effective date.

Notwithstanding the foregoing, we may undertake reasonable efforts to provide advance notice when the Privacy Policy is to be amended to users of the Services who have active accounts at the time of the amendment, you should review this Privacy Policy and all policies regularly to make sure that you are aware of any changes. Your access to use of the Services on and after the date on which we post the revised terms constitutes your acceptance of the Privacy Policy as revised as well as of any revised policies.

SUCCESSORS AND ASSIGNS

The successors and assigns of Triyo may collect, use and disclose your Personal Information for substantially similar purposes as described in this Privacy Policy.

© Triyo Software Inc., 2021.