

## **Entry Privacy Policy – Key Points**

Sayge Inc. (“Company”, “We”, “Us” and similar terms) understands that your time is valuable. Therefore, we have set out below some important highlights of the Ola Contactless Entry Privacy Policy (the “Policy”). You can obtain more information about how we collect, use, disclose and protect your personal information by reviewing our full Policy. **We encourage you to read our full Policy, as it contains important information for you.**

### **What personal information do we collect?**

- We collect information that you provide to us directly, when you download or register for the Ola Contactless Entry App (the “App”).
- We collect information regarding your employees and/or visitors, as applicable, which is entered by you and/or your representatives through our web portal.
- We collect information submitted by your employees and/or visitors via our Ola App, including answers to health questionnaires confirming that they meet your conditions to enter your Establishment.
- We collect certain information when your employee or visitor, as applicable, scans a QR code at your Establishment.

### **Why do we collect personal information and how is it used?**

- We use the information that we collect for the purpose of providing our services to you, including to allow you to confirm that your employees and/or visitors meet the entrance criteria for your Establishment(s) and help you meet your associated legal obligations.
- Communicate with you, including to provide service notifications, customer support, or any information, products, or services requested by you.

### **Is personal information shared or disclosed?**

- We share information with our service providers and affiliates, who may use it for the same purposes that we use such information.
- We may also disclose information in the event of a business transaction, or as required or permitted to comply with any legal requirement, court order or regulatory demand/request (including to public health authorities). We also reserve the right to voluntarily provide information to public health authorities in a de-identified and aggregated form.
- We may also disclose your personal information where permitted by applicable law, if We believe disclosure is necessary or appropriate to protect the rights, property, health or safety of the Company, our affiliates and subsidiaries, our clients, or others.

## **What are the risks / consequences?**

- Although we take steps to safeguard the personal information under our control, "perfect security" does not exist online. It is possible that third parties may unlawfully intercept or access such information.

## **What else should you know?**

- Personal information collected via the App will be stored in Canada and the US, and therefore, may be accessible to courts, law enforcement, and national security authorities in either or both of these countries.
- The personal information collected via the App will be accessible to the following categories of individuals within our organization: the Customer Success Team; the Database Management Team; the IT Operations Team; the Quality Assurance Team; the Account Management Team; and the Product Development Team.
- Individuals have the right to access and rectify their personal information, subject to certain permitted and required exceptions under applicable law.
- Individuals can contact us with questions, including questions about our collection of their personal information, and if they are located in Canada questions regarding collection, use, disclosure or storage of such personal information by our service providers and affiliates outside Canada (or to obtain written information about our policies and practices with respect to such service providers and affiliates).

# Entry Privacy Policy

Last modified: September 21, 2020

## Introduction

Sayge Inc. (“**Company**”, “**We**”, “**Us**” and similar terms) respects individuals’ privacy and takes steps to protect it through our compliance with this OLA Contactless Entry Privacy Policy (the “Policy”). This Policy describes:

- The types of personal information collected, accessed, used, or otherwise processed by the Ola Contactless Entry app (the “**App**”); and
- Our practices for collecting, using, maintaining, protecting, and disclosing that personal information.

This Policy applies only to information about identifiable individuals (“**personal information**”), which We collect in this App and in email, text, and other electronic communications sent through or in connection with this App.

This Policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites a user may access through this App.
- Is provided to, or collected directly by, you or any third party.
- Information that is not about an identifiable individual, where there is no serious possibility that an individual could be identified through the use of that information, alone or in combination with other information.

Our websites, our other apps, and other third parties may have their own privacy policies, which We encourage you to read before providing information on or through them.

Please read this Policy carefully to understand our policies and practices regarding the personal information collected in connection with the App, and how We will treat such information. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this Policy. This Policy may change from time to time (see *Changes to our Privacy Policy*). Your continued use of this App after We revise this Policy means you accept those changes, so please check the Policy periodically for updates.

## Information We Collect and How We Collect It

We collect information from and about users of our App, as follows:

- We collect certain information when a user downloads or registers the App;
- We collect information about your employees and your visitors, from such persons, when you cause them to use the App or to provide information required for the App to function;
- We collect certain information when your employee or visitor, as applicable, scans a QR code at your Establishment; and

- We keep records and copies of correspondence with you and your representative(s), including email addresses and phone numbers, if you contact Us. We may also ask you for information when you report a problem with the App.

Further details are provided below.

We also collect certain information submitted by your employees and/or visitors via our OLA App, including their responses to the health questionnaires used to confirm that they meet your entry criteria, when they wish to enter your workplace or other property or premises owned or occupied by you (each an “Establishment” and collectively “Establishments”). Such information is used to generate a “pass” or “fail” QR code, but is not stored by the OLA Contactless Entry App. For more information regarding handling of health questionnaires and other information collected by the OLA App, please see our OLA Privacy Policy.

When you download, register with, or use this App, We may ask you or your representative to provide certain information, including:

- Information that you provide by virtue of using the App. This includes information provided at the time of registering to use the App, such as your representative’s name, title, email address, phone number, and place of work.
- Information regarding your employees and/or visitors, which you, your representative, and/or your employees enter via our web portal in order for the App to function, which may include the employee or visitor’s name, title, email address, phone number, company name and/or place of work (“Employee and Visitor Information”).

The Employee and Visitor Information is provided by you or your employees when your representative logs into our web portal and submits such information. The system then generates a specific QR code that is sent to the employee or visitor (as applicable) via a mobile app or via email along with certain information so the employee or visitor (as applicable) can confirm compliance with your conditions of entry by completing a health questionnaire. When the employee or visitor (as applicable) comes to your Establishment on the relevant day and scans the QR code on the App that you have downloaded to your device, the App recognizes that QR code as valid (if the conditions of entry have been confirmed), approves the entry of the employee or visitor (as applicable), connects the QR code to the employee or visitor’s name as entered through the web portal, and sends you or your representative an email that the employee or visitor (as applicable) has arrived. Our system will store a copy of the employee or visitor’s information (i.e., his/her name and a “pass” or “fail” depending on whether the person met your entrance criteria) as well as a copy of the interaction between the employee or visitor’s device and QR code with the App.

**It is your responsibility to ensure that you or your representative provides any notices to all employees and visitors, and obtains any consents from such individuals, as required by applicable laws (including relevant privacy and data protection laws) and regulatory guidelines, prior to providing such individuals’ personal information to Us through our web portal or allowing them to use the App on your device(s).**

When one of your employees uses the App by scanning a QR code, we will share with you the employee’s name, answers to his/her health questionnaire for the applicable day, and the date and time of his/her entry or attempted entry to your Establishment. When one of your visitors uses the App by scanning a QR code, we will share that person’s name and whether he or she

passed or failed the health questionnaire on the relevant day, as well as the date and time of the visitor's entry or attempted entry into your Establishment. **You are solely responsible for ensuring that all information that we share with you is protected against loss, theft, and unauthorized access, use and disclosure, as well as ensuring that such information is only used and disclosed by you for the purposes that it was collected or otherwise as required or permitted by applicable law.**

## **How We Use Personal Information**

We use the personal information that We collect or that you or your employees and visitors provide to Us, in order to:

- Provide you with the App, its contents, its services, and any other information, products or services that you request from Us.
- Fulfill any other purpose for which you have instructed us to use it.
- Provide you with notices about your subscription, including expiration and renewal notices.
- Notify you when App updates are available, and of changes to any products or services We offer or provide though it.

For clarity, We use the Employee and Visitor Information that you or your employee provides to Us solely as needed for operation of the App. We may also use aggregated information about your employees and visitors that does not identify any individual or device and cannot be reverse engineered to identify any individual, without restriction, where such information does not constitute personal information under applicable laws.

The personal information that We collect, store or otherwise process, is accessible to the following categories of individuals within our organization: the Customer Success Team; the Database Management Team; the IT Operations Team; the Quality Assurance Team; the Account Management Team; and the Product Development Team

## **Disclosure of Your Information**

We may disclose personal information that We collect or that you, your employees and/or visitors to your building provide to Us through or in connection with the App, as follows:

- To our subsidiaries and affiliates, including Angus Systems Group, Ltd. And Angus Systems Group, Inc.
- To 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 the company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- For any other purpose disclosed by Us when you provide the information, with your consent or the consent or the relevant individual (express or implied, as appropriate, in accordance with applicable laws).
- Where required by applicable law, including to comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- To government and regulatory bodies and institutions when required by law, including public health authorities. We also reserve the right to voluntarily provide information to public health authorities in a de-identified and aggregated form.
- Where permitted by applicable law, including, without limitation, to the extent permitted if We believe disclosure is necessary or appropriate to protect the rights, property, health or safety of the Company, our affiliates and subsidiaries, our clients, or others.

Some of our affiliates, subsidiaries and service providers may be located outside the country in which you reside. Personal information will be stored in Canada and the US, and therefore, may be accessible to courts, law enforcement, and national security authorities in either or both of these countries.

### **Retention of Your Information**

Your information and any information that you, your employees and/or visitors provide to us will be kept in Canada and the United States. We will retain personal information for as long as necessary for the purposes set out in this policy. We will also retain such information to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and as otherwise required or permitted by applicable law.

### **Accessing and Correcting Your Personal Information**

You can generally review, change, rectify, and/or update your personal information by logging into the App or the web portal and visiting your account profile page.

Individuals may also contact Us to access, change, rectify, or update any personal information they cannot access directly, or restrict the processing or object to the processing of any personal information where permitted by applicable law, subject to providing satisfactory proof of identity (see *Contact Information*). Such requests will be considered, and handled in accordance with the applicable laws in the relevant jurisdiction.

### **Your California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. At this time, We do not engage in this type of disclosure.

### **Data Security**

We have implemented measures designed to secure personal information from theft, accidental loss, and from unauthorized access, use, alteration, and disclosure. All personal information that you provide to Us, or that We otherwise collect in connection with the App, is stored on our secure servers behind firewalls.

The safety and security of the information also depends on you. Where We have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential and secure. We recommend that you choose a secure password, and We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although We take steps to protect the personal information, We cannot

guarantee the security of the personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures We implement.

### **Changes to Our Privacy Policy**

We may update this Policy from time to time. If We make material changes to how We treat the personal information, We will post the new privacy policy on this page with a notice that the Policy has been updated, and We will also notify you of material changes by email at the email address specified in your account, where applicable.

The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring We have an up-to-date active and deliverable email address for you and for periodically visiting this Policy to check for any changes. **You are also responsible for ensuring that you or your representative provides notice of the changes to our Policy to all of your employees and visitors whose personal information may be impacted by the change, and you are responsible for obtaining any additional consents required in connection with such amended Policy. You must notify us immediately if any employee or visitor refuses consent to the collection, use or disclosure of their personal information in connection with the amended Policy.**

### **Contact Information**

You may contact our General Counsel at Legal@angus-systems.com, 1125 Leslie Street, Toronto, ON M3C 2J6, or 416-385-8550, in order to:

- Ask questions, make a complaint, or otherwise comment about this Policy, our collection, use or disclosure of your personal information, or our privacy and personal information handling practices;
- Access, correct or update your personal information, to the extent you are not able to do this by logging into the App or the web portal and visiting your account profile page;
- Withdraw consent to continued use and disclosure of personal information, subject to any legal restrictions and reasonable notice; and
- If you are located in Canada, obtain written information about our policies and practices with respect to our service providers outside Canada (including affiliates that provide a service to Us), or to ask questions about the collection, use, disclosure or storage of personal information by such service providers and affiliates.