



XODO TECHNOLOGIES INC.
("Xodo")
PRIVACY POLICY

1. **Our Commitment to Privacy.** Xodo respects your right to personal privacy. Xodo's Privacy Policy is intended to comply with the British Columbia *Personal Information Protection Act*. Xodo expects to regularly review its privacy policies and practices. We reserve the right to change the provisions of this Policy at any time. Notice that changes to our Privacy Policy have been made will be indicated on the Policy the date it was last updated.

2. **Personal Information.** "Personal information" is personally identifiable information such as your name, residential address, and e-mail address or any other information that can be used to identify an, or about an identifiable, individual. Personal information is collected by Xodo when you provide it to us, such as if you choose to register with us after downloading our Xodo software application offered on Apple Corporation's iTunes Application Store web site, Microsoft Corporation's Windows Phone Apps and Game Store, or Google Inc.'s Play Store web site (our "software") or if you visit our web site and choose to provide us with details about yourself, including your name, mailing address, and email address to participate in any services we may offer.

3. **Collection, Use and Storage of Personal Information.** Xodo collects and uses your personal information if and when you register with us, to enable you to use our software's functionality with the related services on our web site. We also collect personal information to allow us to keep you informed on our latest software announcements and software updates. Xodo may also collect certain personal information when you use our web site or services, such as the name of the internet service provider and the Internet Protocol address through which you access the Internet; the time you access our web site; and the pages that are accessed at our web site.

Xodo uses this information to help us develop, deliver, and improve our services. Xodo may also contact you from time to time to conduct market research and surveys in an effort to continually improve our products and services.

4. **Non-Personal Information.** Xodo also collects non-personally identifiable information about you in a number of ways, including tracking your activities through your IP address, computer settings, or keywords used which let us know which aspects of our software you prefer using. We may collect, use, transfer, and disclose non-personally identifiable information for any purpose.

We may collect information such as your occupation, language, zip code, area code, unique device identifier, location, and the time zone where our software is used so that we can better understand customer behavior and improve our services. If we combine non-personally identifiable information with personal information, the combined information will be treated by us as personal information for so long as it remains combined.

5. **Release of Personal Information.** Unless you specifically authorize Xodo to release your personal information, or release is required or permitted by law, Xodo will not sell, lease, or trade your personal information to other third parties. Personal information collected by Xodo is processed and stored in Canada and such personal information may be subject to disclosure in accordance with the laws applicable in such jurisdiction. These laws may not provide the same level of protection for personal information as do the applicable laws of the jurisdiction in which you ordinarily reside. Anonymous or "non-personal" information gathered by Xodo through your use of our software, web site, or our services may be used for technical, research, and analytical purposes. Information collected through surveys may be used by Xodo to analyze our services, target market, and to develop or enhance our services. If Xodo is involved in a merger, acquisition, or any form of sale of some or all of its assets, we may transfer any and all personal information we collect to the relevant third party. Xodo reserves the right to use, disclose, sell, rent, or trade aggregated, non-personally identifiable data provided that such data is not linked to any specific individual.

6. **Informed Consent.** Xodo will only ask for personal information about you that Xodo needs and will only ask for it when it is needed. When Xodo asks you for the information, Xodo will explain to you why such information is needed and what Xodo is going to do with it. Xodo will seek your prior consent to the collection, use, and disclosure of the information as required by applicable privacy legislation.

7. **Use of Cookies.** Xodo's web site, and software technology may use "cookies" to collect information anonymously, helping Xodo understand user behaviour and preferences. A cookie is a small text file that is stored on a storage device by a web site. "Cookies" contain a unique identification number that identifies your browser, but not you, to our computers each time you visit our web site or use certain features of our software. Xodo treats information collected by cookies as non-personally identifiable information.

8. **Integrated Services.** You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google account, or otherwise have the option to authorize an Integrated Service to provide Personal Data or other information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your name, email address(es), and basic profile information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.
9. **Accuracy.** If you have questions about the accuracy of factual information about you, you will have access to that information in order to verify and update it.
10. **Security.** Our web site has industry standard security measures in place to protect the loss, misuse, and alteration of the information under our control. While there is no such thing as "perfect security" on the Internet, Xodo will take all reasonable steps to ensure the safety of your personal information.
11. **Links to Other Web Sites.** Our web site contains links to other web sites. Xodo is not responsible for the privacy practices or the content of such other web sites and expressly disclaims all liability associated with your use of and the content of such other sites.
12. **Non-Canadian Residents.** Personal information collected by Xodo in connection with this Agreement will be stored and processed in Canada.
13. **Revisions to this Privacy Policy.** Xodo expects to revise this Privacy Policy from time to time, reflecting changes in its technology, customer feedback, and applicable legislation. Please ensure that you refer to the current version of our Privacy Policy.
14. **Withdrawing Consent.** Except as required by law, Xodo will not use or disclose your personal information for any purpose for which you refuse us consent or later withdraw your consent. If you withdraw consent, you agree that in spite of this withdrawal we may continue to use the personal information previously provided to us to the extent that we are contractually obligated to do so and to the extent necessary to enforce any contractual obligations you may have to Xodo. You also understand that although you can use our software for some purposes without providing us with any personal information, we need personal information about you for some functionality, including particulars that may require payment or involve an ongoing relationship with Xodo. If you refuse to provide us with the information we require or later withdraw your consent to use and disclose this information, we may no longer be able to provide you with these services.

Last updated: March 12, 2018