### JustGotThat Privacy Policy

This privacy policy discloses the privacy practices of JustGotThat, Inc., the website located at https://www.JustGotThat.com, the JustGotThat mobile applications, and the related services, applications, and websites owned or operated by JustGotThat, Inc. and its corporate affiliates (collectively, the "Service").

#### What Information We Collect

The types of information that we collect fall under two general categories: personally identifiable information (PII) and non-personally identifiable information (non-PII). PII consists of any information which can be used to specifically identify you as an individual, whereas non-PII consists of aggregate information or any other information that does not reveal your identity. This Privacy Policy describes how your PII and non-PII are collected by us, and how we use such information. Please note that we store all information we collect, including PII and non-PII, on servers located in the United States. When you use the Service, you consent to that.

# Log Files

Any time you access the Service, our servers automatically gather information from your browser or device, including some PII and some non-PII. This information includes your IP addresses and browser type (if you are using a browser), device ID, location (if you have enabled this feature), Internet service provider (ISP) or wireless service provider, referring/exit pages, platform type, date/time stamp, and number of clicks. We may use this information to analyze trends, administer and improve the Service, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information. Except as set forth in this Privacy Policy, we do not share this information externally.

#### Cookies

We use "cookies" to keep track of some types of information while you are visiting our website or using the Service. Cookies are very small files placed on your computer, and they allow us to count the number of visitors to our website and distinguish repeat visitors from new visitors. They also allow us to save user preferences and track user trends. We rely on cookies for the proper operation of our Service. If your browser rejects cookies from the Service, then the Service will not function properly with your browser, and we are not responsible for any resulting loss of functionality in the Service.

# Service Analytics

We use third-party analytics service providers ("Analytics Providers"), such as Google, to help us analyze how users use the Service. We may change the Analytics Providers that we use from time to time. The information generated by your browser or device about your use of the Service will be transmitted to and stored by the Analytics Provider(s) on servers in the United States. The Analytics Providers will use

this information for the purpose of evaluating your use of the Service, compiling reports on website or mobile activity for our use and providing other services relating to Service activity and Internet usage. The Analytics Providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on the Analytics Providers' behalf. By using the Service, you consent to the processing of data about you by the Analytics Provider in the manner and for the purposes set out above.

#### **Location Information**

Location Information is mandatory to make use of the services provided on the platform. If you disable location-based services you will not be able to perform a search for services. Otherwise, the Service may collect data about your geographic location. Such location data may include, for example, geographic coordinates or other data used to determine your location (using GPS, IP address, Wi-Fi, or other technology to determine the location of your device), the time when such data is collected, and a non-PII identifier that we may use to correlate such data to you (collectively, the "Location Data"). The Location Data may be collected, stored, and processed by us and/or by our third-party location licensors or service providers. We may use the Location Data to analyze usage of the Service, to improve the Service, and to provide the Service to you (e.g., by providing you with location-based recommendations of places we think you might want to visit through the Service when you are exploring a new city).

### However, it is important to note that:

- (a) We will not share Location Data with anyone other than our licensors or service providers who provide the location services for the Service.
- (b) If any such third-party licensor or service provider collects, stores, or processes any Location Data for the Service, we contractually require that they not use the Location Data for their own purposes (other than analyzing and improving their location products and services) or share this data with anyone but us (other than aggregated, anonymized data that does not identify any individuals).
- (c) You may enable or disable location services at any time using the settings in the app and/or your device's operating system. However, you acknowledge that disabling location services prevents the Service from searching for any Merchant Offers.

# Web Beacons

"Web beacons" (also known as "clear gifs" and "pixel tags") are small transparent graphic images that are often used in conjunction with cookies in order to further personalize our website for our users and to collect a limited set of information about our visitors. We may also use web beacons in email communications in order to understand the behavior of our customers. We do not link the web beacons to any PII.

#### Information About You

When you register for the Service, we collect a variety of information about you to complete your online profile. Except as otherwise stated in this Privacy Policy, we do not disclose your PII to other users of the Service. If you choose to connect your JustGotThat account with Facebook or any other service, we will receive and retain basic account registration data you provide to that service, such as name, email address, user ID and profile page URL. We may also receive and display content relevant to your use of the Service from activity feeds or other information from Facebook and other linked services, including the contents of your "Wall," status updates, comments, photos and location "check-ins" to the extent you grant us access to such information from those services.

#### E-mail

We require an email address from you when you register for the Service. We use your email both for transactional purposes (e.g., activity updates such as notices that another user is now following you on the Service) and for promotional purposes (e.g., newsletters, new product offerings, event notifications, special third-party offers). Email messages we send you may contain code that enables our database to track your usage of the emails, including whether the email was opened and what links (if any) were clicked. If you would rather not receive promotional emails from us, please see the section below labeled "Choice/Opt-Out". We reserve the right to send you certain communications, such as service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. We may also contact you by text message (including to any wireless number you may provide to us) solely in connection with the Service. If you would rather not receive text messages from us, you may change or delete your number from your "Account Settings" page, or ask to be removed from our contact list if you receive a call or text message from us. We fully comply with the requirements of the U.S. CAN-SPAM Act.

### Mobile Phone

We require a mobile phone from you when you register for the Service. We use your mobile phone for location services and as a contact reference for Merchants once you have purchased a Merchant Offering from such specific Merchant.

### Demographic Data

Demographic data is also collected by the Service. We use this data to tailor our visitors' experience, showing them content that we think they might be interested in, and displaying the content according to their preferences. Some of this information may be shared with advertisers on a non-personally identifiable basis.

### Online Survey Data

We may periodically conduct voluntary member surveys. We encourage our members to participate in such surveys because they provide us with important information regarding the improvement of the Service. You may also volunteer for certain surveys that we may offer to our users, and any additional rules regarding the conduct of such surveys will be disclosed to you prior to your participation.

#### **Public Forums**

We make discussion areas available to our Service's users and visitors. Any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose any PII. Please consult the Community Guidelines when posting comments on them for other specific information.

#### Disclosure of Your Information to Third Parties

Disclosure Authorized or Required By Law. You acknowledge and agree that we may disclose information you provide if:

- (a) we believe in good faith that we are authorized or required to do so by law, requests or orders from law enforcement, or any legal process; or
- (b) you give us your consent to do so, including if we notify you that the information you provide will be shared in a particular manner and you provide such information; or
- (c) we believe that disclosure is reasonably necessary or appropriate to protect or defend the rights or property of JustGotThat or a third party or to protect someone's health or safety.

#### Disclosure to Trusted Third Parties By Us

We will only share your information with third parties in the ways defined in this Privacy Policy. We may share your non-PII with third parties, but not in a manner that would reveal your identity. For example, when you access a page on our website, a cookie may be automatically set by us or by our service providers to recognize your browser as you navigate on the Internet and to present you with information and advertising based on your apparent interests.

We may share your PII, sometimes in conjunction with your non-PII, with service providers that may be associated with us to perform functions on our behalf. For example, Merchants, agents or technology infrastructure providers (such as a provider of location services, as described above) may need access to your information to perform services for you. Your information will be treated as private and confidential by such service providers and not used for any other purpose than we authorize. In addition, from time to time, we may share PII (such as email or mailing address) about our user base with carefully selected third parties, so they can offer goods and services that we believe may be of interest to our users. If you do not wish to receive offers from our trusted partners, you can change your email preferences at any time by following the steps outlined in the "Choice/Opt-Out" section below.

Information Transferred As a Result of Sale of Business.

In the event that we are acquired by another company, your PII may be part of the assets transferred to the acquiring party. If this occurs, you will be notified if there are any material changes to the way your PII is collected or used.

# Third-Party Advertising

We may use third-party advertising agencies or other service providers to serve ads on the Service on behalf of JustGotThat or third-party advertisers (e.g., retailers of goods or services). These companies may employ cookies and web beacons to measure advertising effectiveness. Any information that these third parties collect via cookies and web beacons is completely anonymous. Some of these third-party advertising agencies may be members of the Network Advertising Initiative, which offers you the option to opt out of ad targeting from its member agencies by following the procedures listed at Networkadvertising.org.

### Age Restrictions

Our age restrictions for the Service are set forth in our Terms of Use. We do not target any portion of our Service to children under the age of 18.

### **Geographic Restrictions**

Our services are intended for use by Canadian residents at this time, however the information collected in connection with the Service (including PII) is stored and processed in the United States. If you reside outside the United States, in accessing or using the Service, you consent to the collection, transfer, use, storage and disclosure of your information, as described in this Privacy Policy (including PII), in the United States and as governed by United States Law. Users may not access, use, or register for the Service if prohibited by law in their country of residence.

# Security

We have security measures in place that are designed to protect against the loss, misuse and alteration of the information stored in our database. We will exercise reasonable care in providing secure transmission of information between your computer or mobile device and our servers. However, no information transmitted over the Internet can be guaranteed 100% secure, so we cannot ensure or warrant the security of any information transmitted to us over the Internet and accept no liability for any unintentional interception or misuse.

### Links to Other Sites

We are not responsible for the privacy practices or the content of other websites that may be linked to our Service or of any third party advertisers.

Choice/Opt-Out You may use the following options for removing your information from our email mailing list if you wish to opt out of receiving promotional emails and newsletters.

Click on the "unsubscribe" link on the bottom of the email;

Send mail to the following postal address letting us know which promotional emails you wish to opt-out of:

JustGotThat, Inc.

1290 Narva Court

Mississauga, ON L5H1X3

Attn: Customer Service

# **Updating Your Information**

You may change your email address, password and other information from the "My Profile" page accessible via a link from our website and mobile application. To the extent you choose to include PII or other information in your profile, the Service allows you to update or remove that information by editing or deleting the content.

### Contacting JustGotThat

If you have any questions about this Privacy Policy, the practices of our Service, or your dealings with us, you can contact:

Site Administrator

JustGotThat, Inc.

1290 Narva Court

Mississauga, ON L5H1X3

privacy@JustGotThat.com

Acceptance of Privacy Policy

Your use of any of our Services is subject to this Privacy Policy and our Terms of Use. BY USING ANY PORTION OF OUR SERVICE, YOU ARE ACCEPTING THE PRACTICES SET OUT IN THIS PRIVACY POLICY AND THE TERMS OF USE.

# Changes

Any information that is collected is subject to the privacy policy in effect at the time such information is collected. We may, however, modify and revise our privacy policy from time-to-time. If we make any material changes to this policy, we will notify you of such changes by posting them on the Service or by sending you an email or other notification, and we will indicate when such changes will become effective. By continuing to access or use the Service after those changes become effective, you are agreeing to be bound by the revised policy.

### **Effective Date**

This privacy statement was last revised on July 20<sup>th</sup>, 2016.