

CURBIE CARS INC.
PRIVACY POLICY

Curbie Cars Inc. (“we”/“us”) are committed to protecting your privacy. We make the website, www.curbie.ca (the “Website”), available together with our services as further described in our Terms of Service which are available at www.curbie.ca (the “Services”). This Privacy Policy describes how we collect, store, use and distribute personal information, including personal information of Website and Services users.

Consent: By using the Website or our Services you consent to the use of your Personal Information (as hereinafter defined) as described in this Privacy Policy. Except as set forth in this Privacy Policy, your Personal Information will not be used for any other purpose without your consent. We will not actively collect Personal Information for the purpose of sale or marketing of such Personal Information in a way that specifically identifies an individual. In other words, we don’t sell customer lists. You may withdraw your consent to our processing of your Personal Information at any time. However, withdrawing consent may result in your inability to continue using the Website and/or the Services.

Collection of Information: We aim to collect, use and disclose only such Personal Information as is required to enable us to manage your account, to provide the Services (including the transactions facilitated by those Services), to maintain our customer/visitor lists, to respond to your inquiries or provide feedback, for identification and authentication purposes, for Services improvement and to address issues like malicious use of the Services. We will maintain the confidentiality of any Personal Information you provide to us in connection with the Services or by contacting us with questions or for further information and we will use such Personal Information only for such purposes for which we have collected it (subject to the exclusions and disclosures we have listed below), unless you agree otherwise.

Two types of information may be collected through the Website and our Services: Personal Information and Non-Personal Information. This Privacy Policy does not extend to the collection, use or disclosure of Non-Personal Information (as defined further below) or any other information that is not subject to applicable privacy or personal information protection laws.

"Personal Information" is personally identifiable information, such as your name, address, e-mail address, credit card information, birth date and gender. At the time of collection, we will clearly identify the information being collected and the purposes for which it will be used. It is always your choice whether or not to provide Personal Information but if you choose not to provide certain requested Personal Information, in some instances you may not be able to register to use the Website and/or Services or be able to access and use the Website and/or Services at all. In other instances, your choice not to provide certain other Personal Information may mean that you will not be able to use certain features of the Website and/or

Services. We may collect Personal Information in respect of the Website and/or Services through registration processes; communications with you; information downloads; service purchases; user support; and surveys.

"Non-Personal Information" is information of an anonymous nature, such as the domain used to access the Website, and the type and version of the device, browser or operating system being used by visitors to the website. Aggregate information, such as demographic statistics of our users (e.g., average age or geographical allocation of our users), number of visitors, what pages users access or visit, and average time spent on the Website is also Non-Personal Information.

Although the use of certain Non-Personal Information collected, used or disclosed through the Internet as described herein is not restricted (and to the extent that such is the case, the obligations under this Privacy Policy do not apply to such information), we provide information in this Privacy Policy about the collection of such information for the sake of transparency with respect to the operation of the Website and/or the Services. Such Non-Personal Information is collected or derived by us in the course of operating this Website and/or the Services. For example, our web servers may automatically collect Non-Personal Information that is provided through your browser or stored in a cookie when you choose to visit the Website and/or the Services.

Types of Personal Information Collected; Use of Personal Information: We collect the following types of Personal Information for the following purposes:

- Registration: In order to use our Services you must provide certain Personal Information to us such as your full name, address and email address. In general, none of your account registration information will be shared with any other users of the Website or our Services, but this information will be shared with the service providers we use for the operation of the Website and the Services.
- Pre-Sales Information: If you decide to test drive a vehicle, then you will be required to provide the Personal Information described in the list below.
 - Contact information including your full legal name, address, date of birth, gender, email address, phone number and social media handles.
 - Driver's license information. Driver's license information is also required to confirm that you are permitted to operate a vehicle in the applicable jurisdiction.
 - Insurance information. Insurance information is required to confirm that you have the necessary insurance to permit you to operate a vehicle in the applicable jurisdiction.
- Transactional Information: If you decide to purchase a used vehicle through the Services, then you will be required to provide the Personal Information described in the list below. This Personal Information is collected by us for the purpose of

completing used car sale transactions and for complying with legislative requirements applicable to used car sales transactions.

- Contact information including your full legal name, address, date of birth, gender, email address, phone number and social media handles.
 - Payment information such as credit card numbers or other payment credentials used for deposits (provided that these credit card numbers and other payment credentials are not available to us and are held by the applicable payment processor), void cheques or banking information for payments on any financed deals, copies of bank drafts or certified cheques for cash purchases.
 - Deal information including all finalized transaction documents, whether deals are paid with cash or through financing along with any trade-in information.
 - Delivery information including the delivery date, delivery address.
 - Driver's license information including a photo of your driver's license is required prior to the creation of a bill of sale and at the time of delivery. Driver's license information is also required to confirm that you are permitted to operate a vehicle in the applicable jurisdiction.
 - Insurance information. Insurance information is required to confirm that you have the necessary insurance to permit you to operate a vehicle in the applicable jurisdiction.
- Financing Information: If you decide to seek financing for the purchase of a used vehicle from a third-party through the Services, then you will be required to provide the Personal Information described in the list below. This Personal Information is collected for the purpose of allowing customers and potential customers to apply for financing with third-party financing providers in order to complete a vehicle purchase.
- Contact information including your full legal name, date of birth, social insurance number, gender, email address, and phone number.
 - Residential information including your current and previous addresses for the past two or three years, depending on the third-party financing provider.
 - Employment information including your current and previous employers and job information for the past two or three years, depending on the third-party financing provider.
 - Income information including the amount and frequency of your income from your current job, as well as any other sources of income.
 - Driver's license information including a photo of your driver's license is required prior to the creation of a bill of sale and at the time of delivery.

- **Lead Information:** We also collect information from people who are potentially interested in purchasing a used vehicle via the Services. This type of Personal Information may be collected by us via telephone, email, text, social media or electronic forms on the Website or within the Services. This type of Personal Information includes:

- High-level contact information such as email address, telephone number or social media handle or identifier along with the types of vehicles of interest and the source by which a lead become aware of Curbie.

- **Employee and Contractor Candidate Information.** When we seek candidates for potential jobs or contracting engagements, we collect information that those candidates choose to provide to us when applying, which may include contact information, education and employment history, credentials, place of residence and other information a candidate believes to be relevant. For people who become our employees or contractors, we will typically retain the information provided by those candidates in the application process along with additional information to manage their employment or contractor relationship with us, including, without limitation, banking or other payment information (for payment of salaries, consulting fees or other remuneration), information related to income tax reporting and withholding and enrollment in Curbie benefit plans (in each case, to the extent applicable for the relevant relationship).

- **Curbie Suppliers and Service Providers.** We collect business contact information (such as name, business email address, business phone number and business address) of individuals who work for our suppliers and service providers to communicate with those suppliers and service providers about their business relationships with Curbie.

- **Transactional Notifications:** We also provide notifications in respect to certain activities relating to our Services. Despite your indicated e-mail preferences, we may send you notices of any updates to our Terms of Service or Privacy Policy.

- **Statistics:** We also collect statistics about use of the Services and the Website. This information will be kept confidential, however, aggregate statistics that do not personally identify an individual will be kept by us and such aggregate statistics may be made available to third parties on an unrestricted basis.

- **System Logs & Cookies:** Cookies may be used by us to track content usage and traffic on the Website and/or Services. A cookie is a feature of your web browser that consists of a text file that is placed on your hard disk by a web server. The Website and Services use cookies to help it compile aggregate statistics about usage of the Website and/or Services, such as how many users visit the Website and/or Services, how long users spend viewing the Website and/or Services, and what pages are viewed most often. This information is used to improve the content and operation of the Website and/or Services. You can set your browser to notify

you when you are sent a cookie. This gives you the chance to decide whether or not to accept it. If you disable cookies, you may not be able to take advantage of all the features of the Website and/or Services.

Your IP address is reported by your web browser whenever you visit a page on the Website or the Services. This information is recorded together with your registration information on our databases.

- **Advertisements:** Advertisements appearing on the Website may be delivered by us or one or more third-party web advertisers. These third-party web advertisers may set cookies. These cookies allow the advertisement server operated by that third party to recognize your computer each time they send you an online advertisement. Accordingly, advertisement servers may compile information about where or whether you viewed their advertisements and which advertisements you clicked on. This information allows web advertisers to deliver targeted advertisements that they believe will be of most interest to you. The Privacy Policy applies to cookies placed on your computer by us but does not cover the use of cookies by any third-party web advertisers. For the privacy practices of such third-party web advertisers, you should consult the applicable privacy policy for the relevant third-party web advertiser(s).

If we plan to use your Personal Information in future for any other purposes not identified above, we will only do so after informing you by updating this Privacy Policy. See further the section of this Privacy Policy entitled 'Amendment of this Policy'.

Disclosures & Transfers: We have put in place contractual and other organizational safeguards with our sub-processors (see further below) to provide a reasonable level of protection for your Personal Information (see further Security below). In addition to those measures, we will not disclose or transfer your Personal Information to third parties without your permission, except as specified in this Privacy Policy (see our list of sub-processors below and further Important Exceptions below). A list of our current sub-processors can be found below in this Privacy Policy ("**Sub-Processors**").

As at the date of this Privacy Policy, we share Personal Information about you in respect of the Website and Services only with our sub-processors and third parties who provide services connected with the Website and Services ("Ancillary Service Providers"). Our servers and those of our sub-processors are located in Canada and the United States and accordingly your Personal Information may be available to the Canadian or US governments or their agencies under a lawful order, irrespective of the safeguards we have put in place for the protection of your Personal Information.

The Ancillary Service Providers include third-party financing providers. To the extent your Personal Information is provided to an Ancillary Service Provider, your

Personal Information will be governed by their applicable terms of service and privacy policy for that Ancillary Service Provider, therefore you should review those terms of service and privacy policies for the applicable Ancillary Service Provider prior to providing any of your Personal Information to those entities or prior to authorizing us to provide your Personal Information to such Ancillary Service Provider. Curbie is not responsible or liable for any use or misuse that is made of the Personal Information by any Ancillary Service Provider.

From time to time we may use employees or contractors to help us improve the Website and/or the Services. These employees or contractors may have limited access to databases of user Personal Information solely for the purpose of helping us to improve the Website and/or the Services and they will be subject to contractual restrictions prohibiting them from using such Personal Information for any other purpose.

Important Exceptions: We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this Personal Information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Website or Services users, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

We may also disclose your Personal Information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the Personal Information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the Personal Information.

Security: The security of your Personal Information is important to us. We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

You are also responsible for helping to protect the security of your Personal Information. For instance, never give out your Services account information or password to third parties.

Retention: We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend

beyond the termination of our relationship with you. We may retain certain Personal Information as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Policy. If you ask us to remove your Personal Information from our databases, it may not be possible to completely delete all your Personal Information due to technological and legal constraints.

Amendment of this Policy: We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy in the future, we will post an appropriate notice on the home page at www.curbie.ca. Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the change is posted and any material changes will become effective 30 days from their posting on the Website. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about you. The date on which the latest update was made is indicated at the bottom of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Website and/or Services signifies your acceptance of any changes.

Access and Accuracy: You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that Personal Information. Upon receipt of your written request, we will provide you with a copy of your Personal Information although in certain limited circumstances, we may not be able to make all relevant Personal Information available to you such as where that Personal Information also pertains to another user. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Information accurate and up-to-date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your Personal Information. Having accurate Personal Information about you enables us to give you the best possible service.

Contact Us: You can help by keeping us informed of any changes such as a change of address or telephone number. If you would like to access your information, if you have any questions, comments or suggestions or if you find any errors in our information about you, please contact us at: hellocurbie@curbie.ca.

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SUB-PROCESSORS

To support Curbie in delivering the Services and in the conduct of our business, Curbie engages third-party service providers as sub-processors.

This page identifies our sub-processors, describes where they are located, lists the services they provide to us and identifies the type of Personal Information processed.

Our business needs may change from time to time and Curbie will periodically update this page to provide notice of additions and removals to our list of sub-processors.

Service Provider	Types of PI processed	Processor Activities	Location
Amazon Web Services	All personal information submitted via the Curbie website or via the Service admin panel	Hosting	United States
Google Drive	Personal identification information needed for the purchase of a vehicle	Storage services	United States
Equifax	Personal identification information needed for retrieval of credit information including credit score	Credit worthiness checking.	Canada and United States
HubSpot	Personal information gathered via lead and marketing activities	Cloud marketing and sales management services	United States
Quantech	Personal identification information needed for the purchase of a vehicle	Cloud services for preparation and storage of bills of sale	Canada and United States

DocuSign	Personal identification information needed for the purchase of a vehicle	Digital signature of bills of sale and contract storage	Canada and United States
Kixie	Names and phone numbers	Storage of names and phone numbers for customer service purposes	United States
Stripe	Credit card numbers (not available to Curbie)	Payment processing services.	United States
Google Ads	Website use information and cookie information	Ad serving	United States
Facebook (Meta)	Website use information and cookie information	Ad serving	United States
LinkedIn	Website use information and cookie information	Ad serving	United States
Matomo	IP addresses and website and Service interaction information	Website usage analytics	https://matomo.org/matomo-cloud-privacy-policy/
PageSense	IP addresses and website and Service interaction information	Website usage analytics	https://www.zoho.com/en-us/ca/privacy/sub-contractors.html
Google Analytics and Google Tag Manager	IP addresses and website and Service interaction information	Website usage analytics	United States
DealerTrack	Personal identification information needed for credit approval	Transmission of credit information to potential lenders for credit approval	Canada and United States

YouCanBook.Me	Personal Information for booking test drives.	Cloud booking services for test drives	Europe
RouteOne	Personal identification information needed for credit approval	Transmission of credit information to potential lenders for credit approval	Canada and United States

ANCILLARY SERVICE PROVIDERS

The following is a list of Ancillary Service Providers who provided services in connection with the Services and whose privacy policies and terms of service apply in respect to the provision of such services.

Service Provider	Types of PI processed	Processor Activities	Location
TD Auto Finance	All financing-related information for deals sent to this financing source	Potential provision of financing for transactions	Canada
Credit Union Auto Finance	All financing-related information for deals sent to this financing source	Potential provision of financing for transactions	Canada
General Bank	All financing-related information for deals sent to this financing source	Potential provision of financing for transactions	Canada
IA Auto Finance	All financing-related information for deals sent to this financing source	Potential provision of financing for transactions	Canada
Carfinco	All financing-related information for deals sent to this financing source	Potential provision of financing for transactions	Canada

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