

BIX Operations Inc., a wholly owned subsidiary of

ViewTrak Technologies Inc.

Business InfoXchange (BIX) System for Beef

Privacy Policy for Canadian Users

Last Updated: November 28, 2022

1. ABOUT THIS POLICY

This Privacy Policy will change periodically to comply with privacy law requirements. If the changes are significant, we will provide notice.

BIX Operations Inc. ("**BIX Operations**", "**us**", "**we**", or "**our**") owns and operates the Business InfoXchange ("**BIX**") system. We are committed to protecting the privacy of individuals who subscribe to use the BIX services ("**clients**"). This Privacy Policy describes our practices related to the foregoing personal data.

We recommend that you read this Privacy Policy to ensure you are fully informed about the types of personal data we collect, why and how we collect, use, and protect it, how it is disclosed, where it is stored, and to ensure you are fully informed about your rights relating to any of your data.

PRIVACY PRACTICES

How We Collect

BIX Operations collects personal data from you directly when you express an interest in obtaining additional information about our services, register to use the services, register or log in to your account, create or edit your user profile, enter information about your agri-food and by-products operations, contact BIX Operations' customer support team, comment on our blogs or in community forums, or when you interact with us in any form.

What We Collect

- **Personal Information.** When you register an account with us, we may collect personal information from you, such as your first and last name, name of business, and address. You will also be asked to create a login as well as a password for your account. If applicable, credit card information (including your three-digit security number) is collected from a third-party service provider's in-application pop-up window when you register and is used for billing and payment purposes, and to process your registration. Credit card information that you submit through the registration process will not be displayed publicly and will only be used internally by us and our service providers unless otherwise specified and is not stored by us.
- **Business Contacts.** When you access and use our services, we may also collect information about the business contacts that you upload into your account.
- **Customer Information.** When you register in any of the BIX data systems for the purpose of having your cattle, crops, poultry and by-products traced in chain of custody programs.
- **IP Address.** We may collect the IP address of your computer in order to enable us to detect unauthorized transactions, better manage website traffic, and to gather other analytics on our website.

How We Use Your Personal Data

We use your personal data to:

- respond to your inquiries about our services,
- maintain a commercial relationship with you and to communicate with you (which communication may include account verification, and discussions pertaining to your needs and preferences),
- market features and products and provide you with newsletters, promotional materials and information about events, and other information that may be of interest to you, including to deliver tailored content and targeted advertising,
- generate analytics for the improvement of the website and services,
- administer, maintain, manage and improve our website, services and products, and internal operations, including to fix problems individuals may have with our services, such as answering support questions and resolving technical issues,
- manage the BIX services and database platforms (including support systems and security),
- analyze, research and improve our products, business, services, and websites including to create and review data about our users and how they use our services,
- test changes in our services and develop new features and products,
- comply with our legal obligations to establish, exercise, or defend legal claims, and to monitoring, and reporting compliance issues, records retention periods,
- prevent, investigate and respond to fraud, unauthorized access to or use of our services, breaches of terms and policies, or other wrongful behavior, and
- disclose as permitted or required by law, or as otherwise specified at the time of collection.

Cookies and Related Technologies

We and our vendors, including service providers and third parties, use, or intend to use, cookies, which are text files containing small amounts of information that are downloaded on your device, and related technologies such as web beacons, local shared objects, and tracking pixels to store or collect information for the purposes mentioned in this Privacy Policy including targeted advertising, monitoring performance, analytics, and improving our services and website.

Our website uses session cookies (used to maintain authentication while clients are using our products). For more information on cookies, click here: www.allaboutcookies.org.

How You Can Opt-Out of Cookies and Related Technology

You may opt out of our use of cookies and other related technology as follows:

- **Cookies and Other Related Technology.** You can decline cookies through your browser settings. However, if you decline cookies, you may not be able to use some parts of our services.
- **Geolocation Information.** If you do not want us to see your device location, you can turn off location sharing on your device, change your device privacy settings, or decline to share location on your browser.
- **Google Opt-Out** – To opt out of Google Analytics, please see <https://tools.google.com/dlpage/gaoptout/>. To opt out of Google Ads, please see <https://safety.google/intl/en/privacy/ads-and-data/>.
- **Digital Advertising Alliance** — You can also opt out from companies like Google and other participating companies through the Digital Advertising Alliance in the USA: <http://www.aboutads.info/choices/>. You can also opt out of participating companies from the

Digital Advertising Alliance of Canada in Canada: <https://youradchoices.ca/> or opt out using your mobile device settings.

In addition, all marketing messages we send contain an “unsubscribe” link in the email message. You may opt-out of receiving any or all of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contact us at the contact information at the bottom of this Privacy Policy. Please note that we may send one message to confirm your opt out request. Transactional or business relationship messages may continue after you opt out of marketing messages.

Circumstances in Which We Share Personal Data

We do not rent, trade, or share personal information with third parties, except to provide our services, which you requested, when we have your permission, or under the following circumstances:

- We use third parties for credit card processing, which parties are prohibited from using your personally identifiable information for promotional purposes.
- We may export data at your request to our third-party integration partners.
- We may share your aggregate anonymous information with third parties to improve the website and services or for marketing purposes.
- We may share your information with third party contractors such as developers, support administrators, designers, data analysts, and network technicians to maintain and improve the services.
- We may share your information with third party vendors, who help to manage and store data uploaded to BIX Operations, or to support and improve the services.
- We may share your personal information if required by law and if we believe that the disclosure is required or necessary to protect our rights and/or comply with a judicial processing or legal process served on us.
- We may share personal information if we believe that it is required to investigate, prevent, or take action regarding illegal activities, suspected fraud, a potential threat to the physical safety of a third party, or as otherwise required by law.
- We may transfer personal information to a third-party entity in the event of an assignment of this website for any reason. You will be notified via email of any such change in ownership or control of personal information.
- We may share personal information with our legal, financial, and other professional advisors.

We may share personal information with third parties upon receiving your consent, as required by law.

How Long We Keep Personal Data

We retain personal data for as long as your account is open unless a longer retention period is required by law.

YOUR RIGHTS

You have the following rights with respect to your personal information:

- **Right to Access** – You may request to have access to the personal data we have relating to you. We will reply within 30 days either to provide you your information if we have it, or let you know we do not, or if we have it but are not allowed to provide you access, for example if doing so would violate the privacy of another individual, we will provide you with justification.
- **Right to Correct** – If you find your information is inaccurate, you may have it corrected.

- **Right to Withdraw Consent** – If consent was a basis of collection of your personal information and you no longer consent to us retaining and using your personal data, you may request to have it deleted. We will do so immediately, unless legal requirements (for example, tax law in relation to clients) impose retention periods.

HOW WE PROTECT PERSONAL DATA

To keep your personal data safe, we use appropriate security safeguards to provide necessary protection. These include physical measures (e.g., restricting access to offices, and alarm systems), up-to-date technological tools (e.g., passwords, encryption, firewalls and security patches), and organizational controls (e.g., security clearances, limiting access, staff training, and agreements). We apply these measures, tools, and controls based on the sensitivity of the information we collect, use, and store, and the current state of technology. While we make considerable efforts to protect our information systems, no data security measures can guarantee 100% security.

We store personal data through Microsoft Azure, certified under ISO/IEC 27018:2019.

We will never initiate a request for personal information by email or pop-up window (except for the payment pop-up window described under “What We Collect” above). If you receive a request by email or a different pop-up window that appears to be originating from ViewTrak, please do not respond and notify us at the contact information under “QUESTIONS?” below.

TRANSFER OF PERSONAL DATA

Through your use of the BIX system and our services, you will be transferring your personal information into the United States to the Microsoft Azure platform and you consent to that transfer.

NOTICE TO CANADIAN RESIDENTS

All the personal data we collect directly from consumers, whether on our websites, apps or through our services, is through consent. All the personal data that we collect from other sources as disclosed in this Privacy Policy is with the assurance that the individuals have provided consent for that sharing of their personal data.

Your Privacy Rights. You may ask us to take the following actions with respect to your personal information:

- access your personal information;
- verify or correct inaccuracies in your personal information;
- where you have provided your consent to the collection, use and transfer of your personal information, withdraw your consent under certain circumstances.

You may submit these requests by email to privacy@ViewTrak.com. We may require specific information from you to help us verify your identity prior to processing your request.

Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to any legal or regulatory restrictions on disclosing this information. Please note, if you withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

EXTERNAL LINKS AND THIRD-PARTY WEBSITES

This Privacy Policy does not apply to any third-party websites and apps that you may use, including any linked to our services and website. Please note that such websites have their own privacy policies that are different from ours, and you should review their privacy policies to understand the privacy practices of their services before clicking on any links or submitting any personal data to such third parties. We are not responsible for any transactions that occur between you and a third-party website.

CHILDREN'S PRIVACY

Our website, apps and services are not designed for and are not marketed to people under the age of 16 (“**minors**”). We do not knowingly collect or ask for information from minors. We do not knowingly allow minors to use our services. If you are a minor, please do not use our services or send us your information. We delete information that we learn is collected from a minor without verified parental consent. Please contact us at 1-866-456-2207 if you believe we might have information from or about a minor.

CHANGES TO THE PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy from time to time at our discretion. We will indicate changes to this Privacy Policy by updating the “Effective Date” at the beginning of the Privacy Policy. Please review this Privacy Policy periodically and especially before you provide any personal information to us. Your continued use of our Services after any update will constitute your acceptance of our changes.

QUESTIONS?

For questions, concerns, or complaints regarding our data handling practices, compliance with laws or this Privacy Policy, please contact us via privacy@ViewTrak.com or by writing to us at:

ViewTrak Technologies Inc.
Second floor, 10607 – 82 Street NW, Edmonton, Alberta T6A 3N2
Attention: Privacy Team