PRIVACY POLICY

Latest Update: July 2021

Hello there! We are Operam Technologies Inc. ("**Operam**", "**we**", "**us**", "**our**").

This Privacy Policy applies when you:

- navigate on our website at http://www.oplan.ca/ (the "**Website**");

- interact with us on social media, through live chat, by emails or otherwise; and/or

- use our Oplan planner and time management app, available through a web app at https://oplan.app/ (the "**App**");

   (collectively, the "**Services**")

Our App has different user interfaces designed specifically for student users ("**Student Users**"), for their teachers & school administrators ("**Teacher Users**" and together with the Student Users, the "**App Users**"). For the purpose of this Privacy Policy, individuals who are navigating our Website will be referred to as "**Website Users**" (together with the App Users, the "**Users**").

This Privacy Policy is intended for all Users that are over 14 years of age, as well as parents and/or guardians of Student Users who are 14 years old or younger, as applicable, and provides comprehensive information on how we process personal information, and what your rights are as a user and/or as a parent.

Our Services may contain links towards external services which are not part of the Services. For instance, a Teacher User may provide a Student User with a link to a website to learn more about a certain topic. These external services and content are not covered by this Privacy Policy.

If you want to reach out to us regarding our privacy practices, to exercise your rights, for any concerns or questions, you can do so by email at info@oplan.ca, or by mail at the following address:

> Privacy Officer
> Operam Technologies Inc.
> 2845 rue de l'Anse
> Québec (Québec) G1W2G6
> Canada

This Privacy Policy also covers the use of Teacher Users' data for interest-based advertising. For more information about this topic, please click here to jump directly to the

<u>relevant section of this Privacy Policy</u>. **We do not conduct interest-based advertising on personal information of Student Users when they use our App.**

1. What is personal information?

This Privacy Policy applies to personal information. We consider that "personal information" means any information which allows us to identify you directly or indirectly, including "cookies" and other electronic data. Some information may not be personal on its own but may become personal information if associated with other information or if the sum of the information allows us to identify individuals.

A "cookie" is information that a website puts on a computer's hard disk so that a website or web application can remember something about individuals at a later time. In this Privacy Policy, when we refer to "cookies" we also include other technologies with similar purposes, such as pixels, tags and beacons. For more information on cookies, you can refer to websites such as http://www.cookiecentral.com/ and https://www.allaboutcookies.org/.

This Privacy Policy is for transparency purposes and some of the data that we identify in this Privacy Policy as personal information may not be protected as personal information under applicable laws.

2. What personal information do you collect about me, and for what purposes?

We collect personal information to provide you with our Services for the purpose of conducting marketing and to obtain analytics.

Type of data	List of data	Purposes
Website		
Identification & Communication Data	Emails; Last name; First name; Phone number; Content of communications.	To subscribe Website Users to our newsletters, inform you about our offers, promotions and new features. We also collect this information if Website Users request a demo of our App or subscribe to our newsletter.
Cookies Electronic Data	IP address; Device and browser information; Screen resolution; Operating system name and version; Device manufacturer and model.	This information is used to fix bugs, to remember important information, to present the Website in the preferred language and enhance security. Click here to jump to the question relating to our cookies and other tracking technologies.

App		
Educational & Identification Information	Name of Users; Type of User account; Classes that Student Users are enrolled in; email addresses of Users; Teacher Users specialization; Other information which educational institutions may deem necessary, such as student IDs.	When we on-board new educational institutions, we receive this information from educational institutions or from parents, as the case may be, which is used to create accounts or to manage Student Users and Teacher Users' accounts.
Credentials	Email address; Passwords.	Once accounts are created, App Users can connect using their username (their email address) and passwords. The information related to each account includes full name, username, email, password and grade levels for Student Users.
User Generated Information	Work plan; Tasks description; Time schedule; Classification data.	The Services have different views depending on the identity of the User. For instance, Teacher Users view the information related to Student Users under their authority. This information includes work plans, tasks descriptions, time schedules, Student Users' usage, etc. Students can also access live classrooms, in which they can share files but also use a digital whiteboard. Each session is recorded in the history tab and associated with an ID. All sessions' transcripts are accessible by both the Student Users and Teacher Users. User Generated Information is also used to create reporting for Teacher Users and parents of Student Users. We process User Generated Information in order to offer our App to educational institutions, such as to allow Student Users to obtain tutoring services as well as Teacher Users and parents to oversee what their students/children are doing within our App.

Electronic Data	IP address; Device and browser information; Screen resolution; Operating system name and version; Device manufacturer and model.	This information is used to fix bugs, to remember important information, to present the Services in the preferred language and enhance security. Electronic Data is also used to provide notifications to users about activities within the Services. Our Services may also include browser notifications which require Electronic Data.
Usage Data	Time spent on the App; Pages visited; Links clicked; Language preferences; Pages that led or referred you to the App.	In order to understand how our App performs and which functionalities are used, we collect Usage and Performance Data. These may include bugs, errors and logs which are generated by Users, and other data collected by using an anonymous ID associated with Users. Such personal information can be used for support and maintenance, and for troubleshooting.

3. What types of cookies and other tracking technologies do you collect, and for what purposes?

Cookies are small text files that are stored in a computer's web browser memory. When we use the term "cookies" in this policy, we also imply similar tracking technologies such as pixel tags (also known as web beacons and clear GIFs). We also collect mobile advertising identifiers which are then used to serve our ads.

We may use both first-party cookies (installed by us) and third-party cookies (installed by our partners and service providers). We use four (4) types of cookies: essential, analytical, functionality and marketing.

Types of cookies	Description and examples
Essential	Essential cookies are necessary to operate the core functions of our Website and App. These include login cookies, session ID cookies, language cookies as well as security cookies.
Analytical	Analytical cookies are placed on our Website and App to provide us with insights on how you use our Services, what pages you like, and what ads are working. Analytical cookies track visitors on our website, to establish how they browse, and how long they are staying. We use analytics to measures usage and we do not identify you individually when we perform analytics. For instance, we use _ga, a cookie operated by Google Analytics.

Functionality	Functionality cookies record information about choices you have made and allow us to tailor our website to you. This includes preferences such as your location.
Marketing	Marketing cookies are used to track users across websites and devices to serve them with advertising tailored to their behaviour (behavioural targeting). These are often served by third-party companies. **We do not use marketing cookies or mobile advertising IDs in the Student-User interface.**

4. How do you obtain consent from Student Users?

Most of the students who are using our App cannot consent to the processing of their personal information under applicable laws, and a verifiable parental consent is required. The educational institutions which retain our Services are responsible for obtaining such consent from parents and/or tutors in accordance with applicable laws.

5. Where do you store personal information?

We host personal information in Quebec, Canada. However, we use third-party service providers which may be in other countries.

6. How do you protect personal information?

We seek to implement controls that are proportional to the risks to protect the privacy of Student Users and other Users. For instance, we use multi-factor authentication, SSL encryption, physical access controls to files and buildings, and secure file transfer protocols with encryption. Our cloud service provider, Google Cloud Platform, maintains several independent verifications of its security, privacy and compliance control, such as ISO 27017, ISO 27018 and ISO 27001. You can review Google Cloud Platform's safeguards on Google's Trust & Security Center available here.

We also expect and require our service providers to provide an adequate level of security for personal data.

7. How long do you retain personal information?

We retain personal information as long as required to comply with legislations, or as required for our business purposes.

8. Whom do you disclose personal information to?

We do not sell your personal information to data brokers. We conduct digital marketing using marketing partners and perform analytics with other IT service providers. We may transfer ownership of your data in the case of a merger and acquisition, or other corporate

transactions. We may share your personal information with the authorities if justified and required by applicable laws.

This section does not apply to Student Users personal information. Please see the next section of this Privacy Policy which covers this topic.

Type of Partners	Explanations
Marketing Partners	We work with marketing partners to manage our customer database and to target Teacher Users who have not completed their inscriptions. For this purpose, we conduct interest-based-advertising or retargeting. We also work with SEO and other marketing consultants.
Analytics Partners	We use third parties to obtain analytics, including through cookies such as Google Analytics.
Service Providers	We use service providers to provide us with information technologies such as data hosting, or to provide certain functionalities of our services.
Law Enforcement, Regulatory Authorities	If we receive a licit request from competent authorities, we may be required by law to share your personal information. We ensure that we share only what we are required to share by law.
Corporate Transactions	As part of a merger and acquisition, sale of our assets, bankruptcy and other corporate transactions, your personal information will be considered our assets, and as a result, may be transferred to such third parties. This third party will be bound by applicable laws and by this Privacy Policy.

The Services may provide the ability to connect to other websites and applications. If you click on links towards third parties or on advertising, these third parties are not our suppliers, and they process your personal information based on their own privacy policies, which you should review. We are not responsible for the content and privacy practices of these third parties.

We may also share your personal information with our auditors and consultants if they are under a confidentiality obligation, and if they reasonably need to access such information as part of their engagement with us.

9. Whom do you disclose Student Users personal information to?

We do not sell any personal information of our Student Users, and we do not use personal information for any other purposes than to provide the Services, which means that we do not use Student Users' personal information to conduct marketing, to conduct interest-based-advertising or retargeting using cookies in the Student User interface, and we do

not use Marketing Cookies within the Student User interface of the App. We are subject to the same conditions on use and redisclosure of education records that govern school officials under the *Family Educational Rights and Privacy Act* known as FERPA. This means that we only share personal information if required for the Services and with third parties that have legitimate educational interests unless otherwise authorized or required by law.

If we receive a request to access personal information by the authorities, we will transfer this request to educational institutions. If we are prevented by law from doing so or forced to respond, we will first validate that the request is legitimate and disclose only the minimum required with the help of a legal counsel.

Any personal information of Student Users collected through the App is available to Teacher Users and may be reviewed by Teacher Users.

Here are the categories of recipients with whom your personal data is shared so that we can provide you with the functionalities within our Services. Each service provider is bound by an agreement with us which limits their rights to use your personal data for other purposes:

Type of Partners	Explanations
IT Service providers	We use Elastic Search to manage our users and provide support adequately. We host Student Users personal information on Google Cloud Platform in Quebec, Canada. We use Google Analytics to fix bugs and improve our App functionalities, and not for advertising, or any other purposes. We may use other service providers that have access to cookies and electronic data for security purposes or as part of our architecture. We cannot share the identity and contact details of these service providers to protect our infrastructure about attackers. If you have any questions, please contact us using the contact information provided at the top of this Privacy Policy.
Law Enforcement, Regulatory Authorities	If we receive a licit request from competent authorities, we may be required by law to share Student User's personal information. We ensure that we share only what we are required to share by law. Whenever possible as per applicable law, we will advise you before disclosing Student User's personal information to law enforcement or regulatory authorities.

	Law enforcement and regulatory authorities are subject to their own legal obligations about collecting personal information on Student User(s) and these measures are exceptional.
Corporate Transactions	As part of a merger and acquisition, sale of our assets, bankruptcy and other corporate transactions, Student User's personal information will be considered our assets, and as a result, may be transferred to such third parties. This third party will be bound by applicable laws and by this Privacy Policy.

Our Services can be integrated with other learning management platforms through Single Sign-On and APIs, such as Google Classroom, Moodle and Canvas. Integration Partners are not our suppliers or service providers. Educational institutions enter into separate agreements with integration partners to which we are not party, and plug-ins, APIs or other accesses to Integration Partners are only activated at educational institutions' request. This allows educational institutions to integrate our Services with other educational technologies and services relevant to students such as to simplify education. If required to do so to comply with the instructions of educational institutions, we may share personal information with such integration partners. Educational institutions have full control over which personal information they share.

10. Do you conduct interest-based advertising?

When you navigate our Website, both we and certain third parties collect information about your online activities over time and across different sites to provide you with advertising about products and services tailored to our individual interests. This is called "Interest-based advertising" or "IBA". These third parties may place or recognize a unique cookie or other technology on your browser (including the use of pixel tags). Where required by applicable law, we will obtain your consent prior to processing your information for the purpose of IBA. **We never allow IBA to be performed when Student Users are using our App.**

You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to users based on a range of factors, including demographic data, users inferred interests and browsing context (for example, the time and date of your visit to our Website, the pages that you viewed, and the links that you clicked on). This technology also helps us track the effectiveness of our marketing efforts and understand if you have seen one of our advertisements.

We may display interest-based ads to you when you are using social media, such as through Facebook Conversion Tracking Pixel, and Facebook's Custom Audience Tool. This allows us to personalize our ads based on your behaviour with us, such as if you did not complete your registration, and to record how efficient our advertisements are for statistical and market research purposes. The collected data remains anonymous. We do

not share any of your personal information, including your behaviour, with Facebook. Custom Audience Tool lets us convert your email address to a unique number that Facebook uses to match to unique numbers it generates from email addresses of its users as part of advertising network. Depending on the permission you gave Facebook, it may use your data for their own advertising purposes, in accordance with its privacy policy, which you can find here.

We work with Google Analytics and Google AdWords, and other advertising networks. To learn how to opt out of behavioural advertising delivered by Network Advertising Initiative member companies, please visit the Network Advertising Initiative and Digital Advertising Alliance. You may download the AppChoices app to opt out in mobile apps. If you opt out from interest-based advertising, you may see advertising that is not relevant to you. At present, there is no industry standard for recognizing Do Not Track browser signals, so we do not respond to them.

11. What are my rights regarding my personal information?

The extent of your rights depends on the laws that apply to the processing of your personal information, so your rights may vary. Most legislations minimally provide you with these rights:

- The right to be informed about the personal information we process about you;
- The right to access the personal information we process about you;
- The right to modify the personal information we process about you, such as when it is inaccurate.

We are currently not in-scope of the California Consumer Privacy Act, and we do not respond to "Do Not Track Signal". However, if you have a legitimate request about your personal information, we will try our best to assist you.

You can send your request by email at info@oplan.ca, or by mail at the address provided at the beginning of this Privacy Policy. Prior to responding to your request, we will need to confirm your identity.

We may also refuse to respond to your request if the applicable laws do not allow for the exercise of certain rights or for other valuable and legal reasons. If we cannot respond, we will inform you of the reasons. We will respond to your request within 30 days, or within the legal delay prescribed by the law.

If you are not satisfied with how we handle your request, you can lodge complaints to your local authorities. For instance, in Canada, you can lodge your complaint at the Office of the Privacy Commissioner by consulting the information available here.

12. What are parents' rights regarding the personal information that you collect about their Student Users when they use the App?

We only require Student Users to disclose the personal information that is reasonably necessary to participate in an activity. You have the right to review the personal information that we collect about your Student Users, and you can monitor their accounts with us at all times, including by imposing spending limits. You can direct us to delete it, and refuse to allow any further collection or use of the Student Users' personal information.

We do not allow the disclosure of Student Users personal information to third parties, except as strictly required to perform the Services. We only process Student Users personal information based on your explicit consent. We obtain your explicit and verifiable consent through institutions which are responsible for obtaining such valid consents from parents and/or tutors.

You can send your request by email at info@oplan.ca, or by mail at the address provided at the beginning of this Privacy Policy. Prior to respond to your request, we will need to confirm your identity. We will respond to your request within 30 days, or as required by applicable laws.

Depending on your location, different rights may be applicable. However, students may not be able to exercise their rights on their own and may need a parent to do. For instance, the *Family Educational Rights and Privacy Act* known as FERPA in the United States gives rights to eligible students (i.e., over 18 years old) or parents to request that a school correct records which they believe to be inaccurate or misleading. In many cases, the educational institutions where the student is registered is the best entity to contact to exercise privacy rights, as they have the complete records of students. We may be prevented by law to respond to requests to exercise some privacy rights, such as access to records of students, without the authorization of the relevant educational institution.

If you are not satisfied with our we handled your request, you can lodge a complaint with your local authority. For instance, in the United States, you can contact the Federal Trade Commission by visiting ftc.gov or call the toll-free number 1-877-FTC-HELP. You can also watch this video on how to file a complaint.

13. Can I manage my preferences regarding cookies?

Yes! However, some functionalities may require cookies in order to perform as expected, or for security purposes, such as for payment processing. You can control your cookie preferences through your browser. Depending on the browser that you are using, different instructions are applicable. Click on your browser for more information:

- Google Chrome
  - You can also browse on Incognito Mode while using Chrome.
- Firefox
- Safari
- Internet Explorer
- Opera

14. Can I unsubscribe from your newsletters?

Yes, you can unsubscribe from our newsletters at any time by clicking the unsubscribe link in our emails. You can also write to us directly at info@oplan.ca.

15. Can I delete my account with you?

Yes, you can delete your account entirely by reaching out to us at info@oplan.ca. You can delete a Student Users account at any time, however, once you do so, all your data relating to this Student User will be lost.

16. Can you change this Privacy Policy?

Yes. We plan on adding many functionalities and on continuing to develop our Services. As a result, we may need to change this Privacy Policy to reflect how we process personal information over time. We may also change this Privacy Policy to reflect new legislation, new technologies or as reasonably required. If we change this Privacy Policy, we will advise our users by email. If you continue to use our Services, you will be deemed to accept these changes. You can refer to the latest update date above to know when we last updated our Privacy Policy.