# **Privacy Policy**

This Privacy Policy outlines the policies and practices of Kin Innovation Canada Inc ("KIN") concerning the collection, use, disclosure, and transmission of your personal information in relation to Kini Mobile Services.

KIN ("we", "us" or "our") is committed to complying with applicable data protection and privacy legislation and regulations ("Applicable Laws"), including the Personal Information Protection and Electronic Documents Act (S.C. 2000, c. 5) ("PIPEDA"). By continuing to use our website and/or Kini Mobile Service, you accept and consent to the practices described herein. We may update this Privacy Policy from time to time to reflect changes in our practices or applicable laws. When we make changes, we will update the "last revised" date at the top of this policy. Please review this Privacy Policy regularly.

# **Personal Information We Collect**

# 1 Information Collection

In order to provide our products or services, we may collect personal information from you, including but not limited to:

- Identification Data (e.g., name, shipping address, contact address, phone number).
- Electronic Identification Data (e.g., IP addresses, cookies).
- Usage Data (e.g., information about your usage of and interaction with our mobile applications, websites, and services).
- Traffic Data (data processed for the conveyance of communications or billing).
- Payment Details (e.g., credit card and bank information).
- Contact Details (e.g., contact person name, phone number, email address).

Providing certain personal data is voluntary, but we may not be able to offer you specific services without it.

## 2 Additional Data

To enhance your customer experience, we may collect additional personal data on a voluntary basis such as age, date of birth, gender, education, profession, interests, and hobbies.

In addition, your online session data may also be collected indirectly on an aggregated and anonymous basis.

## **Use of Your Personal Information**

## 3 Purpose of Data Collection

We collect and use your personal data to:

- Provide you with mobile phone services.
- Process orders, payments, and service requests.
- Communicate with you regarding service updates, orders, and support.
- Conduct internal research and improve our products and services.

- Administer loyalty programs and promotional offers.
- Ensure the security and integrity of our services.
- Comply with legal obligations and enforce our Terms and Conditions.

### **Disclosure and Transfer of Your Personal Information**

### 4 Data Sharing

We will not sell, rent, or trade your personal data without your explicit consent, except as required by law or to:

- Facilitate the above-mentioned purposes with third-party service providers, contractors, and partners.
- Respond to legal requirements and defend against legal claims.
- Protect our rights, fight against fraud, or to protect anyone's right, property, or safety.

#### Security and Retention of Your Personal Information

#### 5 Data Protection

We implement appropriate organizational and technical measures to secure your personal data. Your data will be accessible only to authorized personnel and retained only as long as necessary for the purposes described above or as required by law.

#### **Direct Marketing**

### 6 Marketing Communications

With your consent, we may use your personal data to inform you about our services, promotions, and offers. You can opt-out of receiving marketing communications at any time on our online portal.

#### **Use of Cookies and Location Data**

#### 7 Cookies

Our websites may use cookies to enhance your browsing experience. Cookies are small text files stored on your device. You can control cookie settings through your browser.

### **Data Access or Correction**

#### 8 Your Rights

You have the right to access, correct, or delete your personal information held by us. Requests will be handled in accordance with Applicable Laws.

### **Contact Us**

### 9 Inquiries

If you have any questions about this Privacy Policy, please contact our data protection officer at <u>dpo@kininnovation.com</u>.

#### Last revised: 27 June 2024