

# Privacy Policy

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This Privacy Policy provides you with information regarding Hashtag Paid Inc.'s ("**#paid**", "**we**," "**our**," or "**us**") hashtagpaid.com practices with respect to the collection, use, retention, storage and disclosure of your Personal Information on the website hashtagpaid.com and our social media pages (for example, Instagram, Twitter, Facebook, and LinkedIn and any other website on which this Privacy Policy is posted) ("**Sites**") and when you otherwise contact or interact with us.

This Privacy Policy may be updated periodically to reflect changes to our personal information practices. We strongly encourage you to refer to the Privacy Policy often for the latest information about our personal information practices.

We use the following defined terms:

"**Personal Information**" means information about you as an identifiable individual. This includes information such as your name, home address, telephone number, personal e-mail address, and personal social media addresses. Your business address, title, and business telephone number are not Personal Information when used to contact you for business purposes.

"**Service Providers**" means other companies and individuals who provide us with services but who are not our employees.

"**Creators**" means social media celebrities and influencers.

"**Marketers**" means brands, advertisers and marketing agencies.

"**Campaign**" means a sponsored marketing campaign.

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## Collection and Use of Personal Information

We collect personal information when you interact with us. For example, we may collect Personal Information when you:

- Visit our Sites;
- Create an account on our Sites;
- Participate in a Campaign;
- Sign up to receive promotional communications;
- Participate in one of our contests, surveys, or promotions;
- Apply for employment at #paid; and
- Contact and/or otherwise interact with us with a comment, question or complaint.

When using certain of our services, you may voluntarily disclose Personal Information on publicly-viewable screens or pages or in areas that may be accessible by other #paid users, such as in the Workroom. You should exercise caution when deciding to disclose any personally identifiable information about yourself.

**Automated Information and Cookies** When you visit or interact with our Sites, we and our Service Providers may use technologies that automatically collect information about how you

access, navigate and leave our Sites. For example, we will collect information on what other website you came from before visiting the Sites, what browser type and operating system you are using, the internet protocol (IP) address you are accessing the Sites from, the average time spent on the Sites, the pages you are navigating through and what website you go to after visiting our Sites. In general, we do not associate this type of information with other Personal Information about you except in the case of an investigation into our website security. We use information to better understand and improve our Sites, including to determine how many visitors visit areas of our Sites, how long they remain on our Sites, whether they use the hyperlinks we provide, and for other marketing purposes.

Our Sites use cookies. Cookies are data that are stored on the device you use to access our Sites. These cookies may be used to remember your preferences and to facilitate your navigation of our Sites. We may also use technologies such as web beacon technologies (sometimes referred to as pixel tags and clear GIFs). Although the information we collect through cookies and web beacons is typically not combined with information that would identify you, there is the potential for this information to be associated with you and, therefore, we treat it as Personal Information. You may set your Web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Sites, you may not be able to take advantage of all of the features of our Sites.

Our Sites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on Site activity and providing other services relating to Site activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You can prevent the storage of data relating to your use of the Site and created via the cookie (including your IP address) by Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. You can also obtain additional information on Google Analytics' collection and processing of data and data privacy and security

at the following links: <https://policies.google.com/technologies/partner-sites> and <https://support.google.com/analytics/topic/2919631?>.

## **Creating an Account**

You do not have to create an account to visit and browse certain features of our Sites, such as to view our Creator pricing scale or samples of past marketing campaigns. However, to access certain features on our Sites, you are required to create an account and provide certain information.

### Creators:

If you are a Creator, you will be asked to provide information such as your email address, first and last name, gender, telephone number, date of birth, the city you are located in, a password for your #paid account, Instagram username or link to your Instagram and other social media accounts, and base rates for posting and creating content on Instagram. We use this information for the purposes of administering your account, better understanding your actual or potential target audience, and connecting you with Marketers.

### Marketers:

If you are a Marketer, you will be asked to provide your email address, first and last name, telephone number, the name of the organization you work for, your monthly marketing budget, and a password. Should you decide to submit a proposal for a new campaign, you will be asked for further information relating to the brand to be promoted, including the name of the brand, any marketing challenges associated with the brand, and your major competitors.

## **Campaigns**

If you are a Creator and you participate in a Campaign, we will collect certain information from you, including your name, address, date of birth, email address, payment details (e.g. direct deposit information), and social media handle. This information is used to assist us in facilitating your participation in the Campaign, such as shipping products to you and paying you for completed Campaigns.

## **Email and other Communications**

We may offer you the ability to sign up to receive #paid marketing and promotional communications through our Sites. If you sign-up, we collect certain Personal Information (such as first and last name and email address) which we use to send you email and other communications containing #paid updates, tips, and other content that may be of interest to you. You can opt-out of receiving promotional email from us by following the opt-out or “unsubscribe” instructions provided in your email or other message, or by contacting us as set out below. Please note that you may continue to receive transactional and account-related electronic messages from us or legal notices.

## **Contests, Surveys, and Promotions**

From time to time, we may offer you the opportunity to participate in one of our surveys or other customer research. We use this information to help us learn about our Creators and Marketers in order to improve our Sites and enhance and develop our service offerings.

When you enter a contest or participate in a promotion, we may collect your name, address, email address, and other information you provide. We use this information to administer your participation in the contest or promotion. At the time you enter the contest or promotion, we may obtain your consent to send you future promotional communications.

## **Employment at #paid**

In connection with a job application or related inquiry regarding potential employment with #paid, you may provide us with certain Personal Information about yourself (such as that contained in a resume, cover letter, or similar employment-related materials). We use this information for the purpose of processing and responding to your application for current and future career opportunities.

## **Customer Service**

When you contact us with a comment, question or complaint, you may be asked for information that identifies you (such as your name, address and a phone number) along with additional information we need to help us promptly answer your question or respond to your comment or complaint. We may also retain this information to assist you in the future and to improve our customer service, product and service offerings, and events and promotions.

## Children and Minors

The Sites are not directed to or suitable for children under 13. We do not knowingly collect Personal Information from anyone under 13 years of age. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will delete this information from our records or, if that is not reasonable, we will take reasonable available steps to de-identify the information. Children who are over the age of 13 but under the age of majority in the jurisdiction in which they reside should not provide us with Personal Information without their parent's or guardian's consent.

## How we obtain your consent

Creators consent to the collection, storage and use of your Personal Information when you provide it to us or you provide it to a third party, such as social media sites, and give the third-party permission to send that information to us. The purposes for the collection of Personal Information that you provide to us will be stated or implicit in the context in which you gave it to us or a third party acting on our behalf. If we want to make additional uses of your Personal Information, we will ask you for your consent. For example, if you provide us with your e-mail address when you make an inquiry, we obtain your implied consent to use it for the purposes of responding to your inquiry. We may ask you for your consent to use your e-mail for other purposes, such as adding you to our newsletter list.

## How we share your information

We will not disclose, trade, rent, sell or otherwise transfer your Personal Information, without your consent, except as set out herein. We may share information we collect about you in the following circumstances.

### Creators on #paid

If you are a Creator and you create an account on our Site, certain of the Personal Information you provide to #paid will be made available to Marketers who have created accounts with #paid

so they can determine your suitability for Campaigns. This information includes your name, city, and information about your social media account(s) and related statistics.

### **Service Providers providing services to us or on our behalf**

Our Service Providers provide services to us and may provide services to you on our behalf. We may share your Personal Information or information that we have collected through automated means on our Sites with our Service Providers. For example, our Service Providers may host our Sites, analyze data collected from our Sites, provide customer service on our behalf, administer our promotions, provide marketing or promotional assistance, post our advertisements, and collect your feedback on our Sites and advertisements. Your Personal Information may be maintained and processed by Service Providers in the United States or other jurisdictions.

### **Aggregated or de-identified information**

We may share information in aggregated statistics and de-identified form with third parties for marketing and analytics purposes.

### **When you specifically agree to us sharing your information**

In some situations, you may specifically agree to us sharing your information. For example, if you are a Creator and you bid on and successfully connect with a Campaign that involves the provision of a free product, we will share the address provided in your bid with the account responsible for the Campaign to facilitate the shipment of the product. If you provide us with your contact information, e-mail address, Facebook account, or Twitter account for the purposes of signing up for information or marketing offers from a third party, we may share your Personal Information for that purpose with your consent. Your Personal Information will be subject to the privacy policy and business practices of the third party.

### **Business Mergers or Acquisitions**

We may transfer any information we have about you as an asset in connection with a proposed or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of #paid or as part of a corporate reorganization or other change in corporate control.

## **Other legally required or permitted disclosures**

#Paid and our Canadian, US, and other Service Providers may provide your Personal Information in response to a search warrant or other legally valid inquiry or order, or to an organization in the case of a breach of an agreement or contravention of law, including lawful access by U.S. courts, law enforcement or other government authorities. We may also disclose your Personal Information in the following circumstances: (a) if such disclosure is necessary for us to receive legal advice; (b) to collect a debt from you; (c) if we are required to disclose your Personal Information in order to comply with any legal obligation or the decision of a judicial authority; (d) if disclosure is requested by an investigatory body, law enforcement official or governmental authority which has lawful authority to request the disclosure of the information in respect of an investigation; (e) if we have reasonable grounds to believe that the information relates to a breach of an agreement or contravention of a law; (f) where necessary for the establishment, exercise or defence of legal claims; (g) to detect, suppress or prevent fraud; (h) to investigate or prevent actual or suspected loss or harm to persons or property; or (i) where we are otherwise permitted or required to do so by applicable Canadian, U.S., or other law.

## **How we store and protect your Personal Information**

We retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected and as otherwise required to meet valid legal and business requirements. We maintain and also require our Service Providers to maintain administrative, technical and physical safeguards in an effort to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your Personal Information. For example, we limit access to staff, employees, Service Providers who need to have access to it for the purposes for which it was collected and who have acknowledged their obligations to protect your Personal Information.

If you are located in Canada, please be aware that information we collect may be transferred to and processed in the United States and other countries in which our Service Providers have operations and will be subject to the laws of those jurisdictions, which may be different from Canada's laws.

## **Links to external content**

Our Sites may link or direct you to other websites, services or external content resources which are outside of our control. Once you have left our Sites, we cannot safeguard and are not



responsible or liable for the protection and privacy of any Personal Information which you provide on other websites. These other websites may send their own cookies to your device and may independently collect data or solicit Personal Information. Please review the applicable terms of use and privacy policies for those other websites.

## **Accessing your Personal Information**

If you wish to access, correct, or update any of your Personal Information in our records or custody and control, you may do so by contacting us at the address listed below in "How to Contact Us."

Please note that we may request Personal Information from you in order to authenticate your identity before providing you with access to your Personal Information or complying with any request to correct or update your Personal Information.

Please also note that in some cases we may legally deny you access to certain information in accordance with applicable law, such as where the information is subject to solicitor-client privilege or consists of Personal Information about another individual or proprietary information that cannot be severed.

## **How to contact us**

If you have any questions or comments about this Privacy Policy or the manner in which we or our Service Providers treat your Personal Information, please contact us at:

Privacy Officer

hello@hashtagpaid.com

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Toronto, Ontario

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**#paid**

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