

MakeShift Privacy Policy

Updated: April, 2024

This privacy policy (this "Policy") describes the policies of AppColony Inc. d/b/a Makeshift ("Makeshift", "we", "us") with respect to our collection, use, storage and disclosure of personally identifiable information about you ("Personal Information") in connection with your use of our our app Makeshift (the "Makeshift App") and all other mobile applications, websites, web pages, and services owned, provided or operated by us, and all services owned, provided or operated by any subsidiary, joint venture or other organization under common control of us (collectively with the Makeshift App, the "Services"). This Policy also describes the choices available to you regarding our use of your Personal Information and how you can access and update your Personal Information.

You understand that if you are using the Makeshift App, it is in relation to your employment by participating employers, our "Clients." You understand that our Clients will have access to information you submit to the Makeshift App for the purposes of administering your employment relationship. If you do not wish to have your employer access or use this information, please do not download or use the Makeshift App. We will not be responsible or liable for any matters, claims or losses of any kind related to the use of, or failure to use, the Makeshift App with respect to your employment.

By using the Services or providing us with your Personal Information (and/or that of an individual for whom you act as parent/legal guardian) to us, you are expressly consenting on your own behalf and on behalf of such individual to our collection, use and disclosure of your Personal Information in accordance with this Policy. This Privacy Policy forms part of our website Terms of Service found [here](#).

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE THE SERVICES OR PROVIDE US WITH YOUR PERSONAL INFORMATION.

Information We Collect

All individuals have the right to withdraw their consent at any time and we inform individuals of that right at the time of obtaining consent.

The Services may be provided conditional on your consent where the collection, use or disclosure of your Personal Information is integral to providing the Services. If a consent integral to the Services is withdrawn by you, we will inform you of the effect of that on our ability to provide the Services. We will not be liable for any inability to provide the Services or any portion of the Services caused by lack of a required consent, or withdrawal of a required consent.

In connection with your use of the Services, we may collect and store information that you submit through the Services, as well as information about your use of and activities on the Services. Regarding the Makeshift App specifically, your employer may make an account for you on the Makeshift App. We will also collect information from your employer and use it in conjunction with information collected via the Makeshift App directly. Such information may include your email address, phone number, name, title, place of work, scheduling information, username and password. We collect this information as a service provider to your employer (our Client).

The Personal Information we collect from you may include the following:

- **Your Account.** If you create an account with us, we may collect and store your email address, phone number, name, title, place of work, scheduling information, employee ID, username and password. You can make changes to your account details here [\[LINK\]](#).

- Purchase. If you elect to setup a free trial or purchase a product on our Services, you will be required to provide us with your name, e-mail address, credit card number, expiration date, and billing address.
- Your Activity. We may collect and store information about how you use the Services, such as the pages you visit from within our websites or mobile applications, and the date and time of your access to the Services.
- Location. Location features of the Services, such as our time tracking capabilities feature, requires your geographic location. For example, when you use our mobile applications or our websites, we may collect your location information, which will allow us to provide you with information relevant to a particular geographic location. You can enable or disable the location features of the Services at any time.
- Your Hardware. We may collect and store information about your computer or mobile device, including the type of device, web browser information and referring URLs, mobile carrier, IP address, Bluetooth connection, location data and compass information, unique device or account identifier.
- IP Address. We collect and analyze traffic on our Service by keeping track of the IP addresses of our visitors. An IP address is a unique number assigned to your computer when you are using your browser on the Internet. We log this information so that we can monitor things like the number of visitors visiting the Services. However, we do not link your IP address to any personally identifying information.
- Your Preferences and Interests. There may be opportunities for you to provide us with additional information regarding your preferences and interests. This additional information, however, is not required and is completely optional on your part. Additional data may be collected from you based on certain services you elect to utilize. By obtaining this information, we can provide our users with specific content and advertising in which they might be interested. None of this additional information is required to use our Services or to become a user; however, the omission of certain types of data will limit the value or functionality of your use of these features.

How We Use Information

We may use the Personal Information we have collected about you in the following ways:

- to provide you with the Services and their contents and any other information, products or services you request from us;
- in the case of the Makeshift App, to assist you and your employer to administer your employment relationship, which includes scheduling your shifts;
- to run chatrooms, blogs, discussion groups, and bulletin boards;
- to respond to your questions or comments that you send to us;
- to contact you for feedback and surveys;
- to contact you regarding policy changes;
- to enforce this Policy and our Terms of Service;
- to maintain security and regulatory requirements;
- we, and our third party business partners may also send commercial electronic messages to you for marketing and promotional purposes in accordance with anti-spam laws and your marketing preferences; and
- to engage in activities related to the above.

Aggregated, anonymous information collected through the Services may be used and disclosed to improve the performance, functionality and content of the Services.

The usage and device information we automatically collect helps us to improve our App and to deliver a better experience by enabling us to estimate our audience size and usage patterns and recognize when the Services are used and which features are accessed.

We attempt to personalize your experience on the Services by tracking shift requests, shift exchange requests, and other content you may have sent or received. From time to time, we may send you surveys or solicit your

feedback. We use surveys to gauge user interest in products and premiums we may offer, as well as to try and enhance your experience with the Services, by creating additional products or services, or optimizing those Services that already exist. We will ask for your feedback on many site and Services features.

Additionally, when you create an account with us, you are agreeing to receive emails and electronic notifications from us. You can change your notification preferences on your mobile phone.

Where applicable, you may opt out of having your Personal Information used or disclosed for a specific purpose at any time by contacting us at support@makeshift.ca. To opt out of push notifications, please edit settings at the device level.

You may choose to stop receiving marketing communications by following the unsubscribe instructions included in the communication or you can contact us indicating your wishes at support@makeshift.ca. Please note that when you opt-out of receiving marketing messages, you may still receive other messages from us such as important service messages or legal notices.

Sharing and Third Parties

We may share your Personal Information or portions of your Personal Information with third parties in accordance with law or with this Policy. We do not sell your Personal Information to third parties.

We may share your Personal Information with third parties in the following ways:

- **Business Transactions.** In the event that Makeshift, its units or subsidiaries are ever sold, acquired, merged, liquidates, reorganized, or otherwise transferred, we reserve the right to transfer our user databases together with any Personal Information contained therein, to a third party acquiring Makeshift assets.
- **Your Employer.** In the case of the Makeshift App, we may share your Personal Information with your employer for the purposes of fulfilling our legitimate obligations under the terms of our agreement with them.
- **De-Identified Data.** We may share aggregated, anonymous information that includes or is based on information about you with third parties. This is information that is combined with the information of other users, in summary form that does not identify you and is not Personal Information.
- **Supplementing Aggregate Information.** We may supplement aggregate information collected from the Services with similar information obtained from companies with whom we have marketing or other business relationships and other third party sources. If aggregate information is ever linked with your Personal Information, such information will be treated as Personal Information for the purposes of this Policy as long as it is linked.
- **Legal Process, Investigations and Emergencies.** Your Personal Information may also be disclosed to government agencies as required by applicable law. We may also share your information with third parties where required to protect and defend our legal rights, protect the safety and security of other users of the websites, prevent fraud, and to comply with the applicable law.
- **Our Corporate Family.** We may share Personal Information with our parent, subsidiaries, joint ventures and other organizations under common control of Makeshift.
- **Our Service Providers, Sub-Processors/Onward Transfer.** We may provide your Personal Information to companies that provide services to help us with our business activities such as data hosting providers or offering you customer service. These companies are authorized to use your Personal Information only as necessary to provide these services to us, and in a manner consistent with this Policy.

Cookies and Other Similar Technologies

We, and third parties, including our partners, affiliates, tracking utility company, and services providers, may use cookies. Cookies are pieces of information or data sent to your browser from a web server and stored on your computer's hard drive for record-keeping purposes. Cookies tell our computer that you have visited before and help to make your visit more personalized, so you do not have to re-enter information on a return visit. Cookies also allow us to count the number of unique and return visitors who use our Services. We do not tie the information gathered to your Personal Information.

We, and third parties, including our partners, affiliates, tracking utility company, and services providers, may also use web beacons/pixel tags, log files, local shared objects (which may, on the web-coded portions of the Services, include "flash cookies") barcodes, session ID, persistent cookies, and other technologies to collect certain information about users of the Services, interactions with our applications, websites, emails and online advertisements. For example, through these means, we may collect your browser, device type and its operating system, viewed webpages, links that are clicked, IP address, sites visited before coming to our website, emails we send that you open, forward, or click through to our website. Collecting this information helps us to best tailor the Services and enhance your experience by saving your preferences while you are using the Services, and to help identify site features that may be of particular interest to you. The use of cookies by third parties including our partners, affiliates, tracking utility company, services providers, is not covered by our Policy.

If you prefer, you can reset your browser to notify you when you have received a cookie or, alternatively, disable some cookies and similar technologies through settings on your device or internet browser. Note that the opt-out will apply only to the device or browser that you are using when you elect to opt out. Furthermore, it is important to note that you may not be able to use certain features like checking out (and participation in certain offerings) on our Services if you choose not to accept cookies. Cookies can also enable us to track and target the interests of our users to enhance the experience with our Services.

For more information on cookies and how to disable cookies visit <https://youradchoices.ca/en/tools>.

Information Storage and Retention

All data collected through the Services, including Personal Information, is stored in data centres located in the United States, unless otherwise specified to you if required in accordance with applicable laws. We have third-party providers who may be located outside Canada or the United States and who may access certain data for support purposes.

AppColony will retain Personal Information only as long as necessary for the fulfillment of the purpose for which it was disclosed and for a reasonable time thereafter or for so long as we are required to maintain such information by applicable law, whichever is longer. Your consent to our collection, use and disclosure of your Personal Information for such purposes remains valid after the termination of our relationship with you.

We will either securely destroy your Personal Information when it is no longer needed or required to be kept for reasonable legal or business purposes, or we may remove your personally identifiable information to render the remaining information anonymous.

Data Security

We recognize our legal obligations to protect the Personal Information we have in our custody or control. We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it.

It is important to note, however, that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee absolute security of your Personal Information. Any transmission of Personal Information is at your own risk. Without prejudice to any mandatory legal obligations to which we may be subject, we are not responsible for circumvention of any privacy settings or security measures on our Services.

The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential.

If you have any questions about the security of our Services, you can send an email to support@makeshift.ca.

Third Party Links

The Services may contain links to unaffiliated third party websites. Except as discussed in this Policy and with your consent, we do not share your Personal Information with them, and are not responsible for their privacy practices. Any information submitted by you to such a third party is subject to that third party's privacy policy. We cannot be responsible for Personal Information that third parties may collect, disclose, store and use, including through their websites. Please review the privacy policies on these linked sites before sharing your Personal Information with third parties.

The Services may also provide you with the opportunity to share your account profile through social media services like Facebook and Twitter. Note that the Personal Information you share on those platforms will be governed by the terms of use and privacy policies of those social media services, and we have no control over those.

Children

Personal Information from children under 13 without parental consent. No one under age 13 may provide any Personal Information to or on our Services.

If you are under 13, do not:

- Use or provide any Personal Information on our Services,
- Register for our Services, make any purchases through our Services,
- Use any of the interactive or public comment features of our Services, or
- Provide any Personal Information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that personal data. If you believe we might have any Personal Information from or about a child under 13, please contact us at support@makeshift.ca.

Your Privacy Rights

You have rights to access, correct and delete your Personal Information and to withdraw consent at any time. If you have created an account on the Services, you may review, change, or terminate your account at any time.

We make commercially reasonable efforts to keep our records of your Personal Information complete, up-to-date and accurate. We rely on you, however, to disclose all material information and to inform us of any relevant changes or corrections as they may relate to you.

Please note that requests regarding information we collect or that is generated about you on behalf of your employer (our Client) will need to be directed to your employer. If a Client requests that we remove data, we will respond to their request within 30 days.

Should you wish to access, update, correct or delete your Personal Information, or express any concerns regarding our use of your Personal Information, please contact us by email at support@makeshift.ca. We encourage you to contact us as soon as possible, and we will make the appropriate reasonable corrections or amendments, upon receipt of appropriate evidence justifying the corrections or amendments.

Requests for access are subject to the following:

- All requests must be in writing.
- In order to receive a response to such a request, the individual must provide us with sufficient information to locate their record, if any, and to respond to them.
- We will make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible.
- All requests may be subject to any fees and disbursements the law permits us to charge.
- Where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to Personal Information.

To request removal of your Personal Information from our blog or community forum, contact us at support@makeshift.ca. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

We will make reasonable efforts to respond to your requests as soon as practicable, or in any event, in compliance with applicable laws. In order to protect your privacy and security, we may take steps to verify your identity before granting access or making any changes to the Personal Information that we maintain.

Please note that an individual's ability to access his or her Personal Information under our control is not an absolute right. In some cases, applicable laws may prohibit disclosure of your Personal Information or justify a refusal to disclose.

In some jurisdictions you may have rights that allow you greater access to and control over your Personal Information, such as a "right to be forgotten" or other rights. If you have a request regarding these rights please contact us support@makeshift.ca. We will consider and act upon any request in accordance with applicable data protection laws.

If you are unsure as to whether we are holding any Personal Information that belongs to you, you may email us at support@makeshift.ca for confirmation.

Privacy of Online Messages

This Policy applies to all aspects of our Services, including your personalized messages, attached photos or graphics, or other personal content. We do not monitor or edit the contents of the online messages or information you send. On occasion, however, we may need to view your messages in connection with the maintenance of our network.

Changes to this Policy

We may amend this Policy from time to time as required and without notice, for any reason whatsoever. When an updated version of this policy is implemented, it will be posted on our websites and in the Services, and you will see a date depicting the last update of the Policy at the beginning of the Policy. If there are material changes to this Policy or in how we use your Personal Information, we will prominently post such changes prior to

implementing the change or notify you by email to the email addressed specified in our account. We expect you to periodically review this Policy to be informed of how we are protecting your information. You may review this Policy anytime as it will always be linked to our website or available in the Services.

Contact Us

If you have any questions about this Policy, or if you wish to exercise your rights to access your Personal Information, or to change or correct your information or have it deleted, you can contact the MakeShift Privacy Officer at:

MakeShift Privacy Officer

MakeShift

PO Box 71094

Silver Springs

Calgary, AB

T3B 5K2

Email: support@makeshift.ca

Phone: 1-587-390-2060

Fax: 1-587-390-0098

Should you have any complaints about this Policy or about how we process your personal information, we hope that you will contact us directly, but you are also entitled to contact the Office of the Privacy Commissioner of Canada toll-free: 1-800-282-1376.