

RAFFLEBOX PRIVACY POLICY

Updated January 20, 2022

At Rafflebox Technologies Inc. (“**Rafflebox**”, “**we**”, “**us**” or “**our**”), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that Rafflebox or its affiliates collect from or about you on or through our fundraising platforms and websites, including www.rafflebox.ca (collectively, the “**Platform**”), as well as how we use and to whom we disclose that information. Our Platform enables our clients, namely non-profits such as schools, minor sports teams and charities (each, a “**Client**”), to create and manage online raffles, sweepstakes and 50/50 fundraisers through the Platform (each, a “**Fundraiser**”). Through the Platform, we also provide the public with opportunities to participate in the Fundraisers that are offered by our Clients.

By accessing or using our Platform, you signify your acceptance of this Privacy Policy and agree to be bound by its terms. You can withdraw your consent at any time, however, if you choose to do so, we may not be able to provide you with the services and communications that are available through the Platform.

This Privacy Policy forms part of our Terms of Use, available at www.rafflebox.ca/privacy. Please review this entire document carefully.

This Privacy Policy is effective for Canada

Rafflebox is subject to the *Personal Information Protection and Electronic Documents Act* (Canada) and applicable Canadian provincial privacy legislation. Privacy laws vary by jurisdiction. You acknowledge and agree that access to the Platform and the services that are available through the Platform are provided via the Internet and that your information, including personal information, may be transferred across national borders and stored or processed in accordance with the terms and conditions of this Privacy Policy.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be consistent with privacy requirements for all jurisdictions. If you are visiting our Platform and are not a resident of or located in Canada, you should note that by providing your personal information to us, you are: (i) permitting the collection, use, disclosure, transfer and other processing of your personal information in Canada which may not have the same personal information protection laws as the jurisdiction in which you reside; and (ii) permitting the use of your personal information in accordance with this privacy policy and the laws of Canada.

Revisions to this Privacy Policy.

Rafflebox may make changes to this Privacy Policy from time to time to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our Platform.

If we make any material changes we will notify you as required by law, but encourage you to check back often for updates. Your continued use of the Platform after an update or amendment to this Privacy Policy means that you consent to the collection, use, and disclosure of your personal information as described in the updated Privacy Policy.

This Privacy Policy was last updated on January 20, 2022.

What is personal information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual.

What personal information do we collect?

Personal information you give to us

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This personal information may include, but is not limited to:

- contact and identification information, such as your name, mail address, billing address, telephone number and e-mail address;
- payment information, such as your credit card number, debit card number and billing address; and
- any additional personal information you provide in using the Platform and our services.

Personal information we receive from third parties

As a general rule, Rafflebox collects personal information directly from you. In most other circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions). From time to time, we may utilize the services of third parties and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

For example, if you would like to make a purchase or payment through our Platform, you will need to separately disclose certain personal and payment information to our third party service provider Stripe which provides payment processing services for our Platform. In connection with the processing of transactions, Stripe may contact you directly and request that you provide personal information or payment information directly to Stripe in connection with its payment processing services. The personal information collected by Stripe is collected, used and disclosed in accordance with Stripe's privacy policy which can be found here: <https://stripe.com/en-ca/privacy-center/legal>. Please note that in connection with the processing of your payments, Stripe may share the personal information that you provide to Stripe through or in connection with our Platform with us. The purpose of our collection of this information is to verify and confirm that a transaction has been completed before we provide you with the tickets, entries or other products or services that you have purchased, ordered or requested through our Platform.

We may also receive your personal information from our Clients who may provide us with their donor and participant lists in connection with the operation of a Fundraiser.

Other information that is collected when you use the Platform

In addition to the personal information you may provide to us as described above, we automatically collect certain device and statistical information to make our Platform work better for you. For example, we collect the IP address, network connection, the device domain used to access our Platform, the operating system on your device, your device settings, the type and version of your browser, crash data, other unique device identifiers, the mobile application or

website you came from to access the Platform, the page you entered and exited at, any searches, pages or advertising within our Platform that is viewed by that IP address and what country you are from. We use this information to monitor the performance of our Platform (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our Platform.

Our Platform uses cookies and other technologies that are similar to cookies (“**Cookies**”). A Cookie is a small file of letters and numbers that we may set on your device to store and sometimes track information about you. Cookies and similar technologies we use are designed for “analytics”. This allows us to distinguish you from other users of the Platform. This helps us to provide you with a good experience when you use the Platform and allows us to improve our Platform.

First party Cookies are Cookies set by the website that you are visiting. Only that website can read them. In addition, a website might potentially use external services, which also set their own cookies, known as third-party cookies. Persistent Cookies are Cookies saved on your computer and that are not deleted automatically when you quit your browser, unlike a session Cookie, which is deleted when you quit your browser.

We use the following Cookies:

- Strictly Necessary Cookies. These are Cookies that are required for the operation of our Platform. They include, for example, Cookies that enable you to remember information you have typed into an online form.
- Preference/Functionality Cookies. These Cookies allow a website to remember the choices a user has made in the past, like what language the user prefers or what the user’s name and password are so that the user can automatically log in.
- Statistics/Performance Cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our Platform when they are using it. This helps us to improve the way our Platform works, for example, by ensuring that users are finding what they are looking for easily.
- Targeting/Marketing Cookies. These Cookies record your visit to our Platform, the pages you have visited and the links you have followed. We will use this information to make our Platform and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

We also may use third party Cookies from our third party service providers to monitor and manage your activity during a session on our Platform. These Cookies track information such as sessions, user inputs and user authentication. Our service providers may also use cookies to determine whether you navigated to the Platform from an external website or link to track the effectiveness of external postings.

Rafflebox also utilizes your IP and other geolocation information to determine the city that you are in. Geolocation information is only collected where it is relevant to the activities for which you use or intend to use the Platform.

Most internet browsers allow you to remove or manage Cookie functions and adjust your privacy and security preferences. For information on how to do this, access the “help” menu on your internet browser or visit <https://www.aboutcookies.org/how-to-control-cookies/>. Please note that

disabling our Cookies may result in your inability to take full advantage of all of the features of our Platform.

By accessing or using our Platform you acknowledge, understand and hereby agree that you are giving us your consent to track your activities through use of cookies, web beacons and other tracking technologies provided by our third party service providers and that we may use these technologies in the emails we send to you.

Why do we collect personal information?

We only collect information from you that is necessary to provide you with the products and services available through our Platform and which enables us to manage, maintain, and develop our operations. For example, we collect information in order to:

- establish, maintain and manage our relationship with you, including by contacting you, so that we may provide you with any services or communications (e.g., tickets, entries and other related information) that you have requested or purchased through the Platform;
- verify your identity and eligibility to access and use our services, receive our communications and otherwise interact with us and on and through our Platform;
- to verify and confirm that a transaction has been completed before we provide you with the tickets, entries or other products or services that you have purchased, ordered or requested through our Platform;
- allow you to operate, manage or participate in Fundraisers, subscribe to or otherwise receive services and communications from us;
- be able to comply with your requests (e.g., if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- understand your preferences and tailor communications, advertising, marketing, and services to you and to send you information about Rafflebox, its partners, and our respective products and services;
- protect Rafflebox against error, fraud, theft and damage to our Platform, assets or other properties;
- process and facilitate payments for our services and to provide, administer and monitor you purchases, fees paid and payable, and transaction history;
- conduct analysis and evaluations to understand usage and trends to improve our Platform, services, communications and operations;
- enable us to comply with applicable laws or regulatory processes; and
- any other reasonable purpose to which you consent.

By consenting to our collection, use and disclosure of your personal information through our Platform you allow us to fulfill the purposes for which we collect your personal information. When we collect your information for research and development purposes, we ensure that any information used for our analysis and reports will be de-identified and aggregated in a manner that will not identify you.

We will collect your consent prior to sending you any commercial electronic messages, unless an exception to obtaining your express opt-in consent applies under Canada's Anti-Spam Legislation (CASL). You will have the opportunity to opt-out of receiving commercial electronic messages at any time.

How do we use your personal information?

We may use your personal information:

- as permitted or required by applicable law or regulatory requirements;
- for the purposes described in this Privacy Policy; and
- for any additional purposes for which we have obtained your consent to use your personal information.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When and to whom do we disclose your personal information?

Affiliates and Service Providers

We may disclose your personal information to our affiliates (including our portfolio companies) and our respective employees, contractors, consultants, service providers and other parties who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf. For example, we use the following third party service providers to assist us in operating the Platform and our business:

- Mailchimp, which provides with email marketing services. Mailchimp's privacy policy can be found here: <https://mailchimp.com/legal/privacy/>.
- Stripe, which provides online payment processing services available through the Platform. Stripe's privacy policy can be found here: <https://stripe.com/en-ca/privacy-center/legal>.
- Zendesk, which provides online support services. Zendesk's privacy policy can be found here: <https://www.zendesk.com/company/customers-partners/privacy-policy/>.

In addition, we may disclose your personal information, including, without limitation, your email address, to third parties that operate social media platforms (e.g., Facebook, Instagram, and Twitter) for the purpose of assisting us with our advertising efforts, including, without limitation, in connection with serving you (and people who are similar to you) with targeted advertising regarding our products and services.

Clients

We may also disclose your personal information to a Client that is operating a Fundraiser in which you have chosen to participate. For example, if you have purchased a ticket or other form of entry into a Fundraiser, we may share your name, phone number and mailing address with the Client that operates the Fundraiser.

Business Transactions

Personal information may be disclosed or transferred to another party during the course of, or upon completion of, a change in ownership of, or the grant of a security interest in, all or a part of

Rafflebox or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Other General Disclosures

Finally, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of Rafflebox' regular reporting activities under applicable law to protect the rights and property of Rafflebox;
- during emergency situations or where necessary to protect the safety of a person or group of persons; and
- for any additional purposes for which we have obtained your consent to disclose your personal information.

Since we may share your personal information with third parties, as described in this Privacy Policy, your personal information may be collected, used, processed, stored or disclosed outside of your jurisdiction of residence, including in the United States. As such, your personal information may potentially be accessible to law enforcement and national security authorities of another jurisdiction. If you would like further information about our policies and practices regarding the third parties (including our service providers) with whom we disclose your personal information and how these third parties collect, use, disclose and store personal information, please contact our Privacy Officer using the contact details below. ***By providing your personal information to us, you consent to our disclosure of this information to our service providers (and other third parties) as described in this Privacy Policy, including those that may be located outside of your jurisdiction of residence, for the purposes of processing your personal information on our behalf, providing services to us or to you, operating and hosting our Platform and business and for the other purposes described in this Privacy Policy.***

Your consent is important to us.

It is important to us that we collect, use or disclose your personal information only when we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. We may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavour to advise you of that purpose before such use or disclosure.

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out

below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer. If you withdraw or vary your consent, we may not be able to provide you with the communications and/or services you request through our Platform. For example, if you would like to receive our newsletter, but are not willing to provide your email address, we will not be able to fulfil your request.

Unless you advise us otherwise, through the access and use of our Platform, services and communications, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

The protection and storage of your personal information

Rafflebox will endeavour to maintain commercially reasonable physical, technical and procedural safeguards that are appropriate based on the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction. Among the steps we take to protect your information are: physical premises security, restricted file access, technological safeguards such as encryption, firewalls and other security software, and internal password and security policies.

The security of your personal information is important to us. Please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

While we use all commercially reasonable efforts to protect the information you submit to us, no method of transmission over the internet or electronic storage is 100% secure.

Updating your personal information.

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes. To advise us of any changes, please email us through the support portal available on the Platform or contact our Privacy Officer.

In some circumstances we may not agree with your request to change your personal information.

How to access to your personal information.

You can ask to access the personal information that we have received from or possess about you. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your

personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

Retention of personal information.

We don't keep your personal information forever. We keep your personal information as long as is reasonably necessary for us to complete our dealings with you, or as may be required by law, whichever is longer.

Links to third-party websites.

This Policy does not apply to the privacy practices of these third party websites (including those of other users) which might collect personal information from you.

Our Platform may contain links to other Platforms that may be subject to less stringent privacy standards. These links are provided for your convenience only and you assume all risk for clicking these links to other websites. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites, including the websites of our Clients. Rafflebox is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

Personal information of minors

Our Platform is not intended to solicit information of any kind from individuals under the age of 18 or the minimum legal age in their jurisdiction of residence to use the Platform ("**Minors**") without the required consent from their parents/guardians. If we become aware of any information we possess that may belong to a Minor, we will immediately obtain parental consent to delete this information from our servers. If you are a parent/guardian and you suspect that your child may have submitted personal information to us, please contact our Privacy Officer at simon.cusack@rafflebox.ca.

Interpretation of this Privacy Policy.

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore, where the word "including" is used, it shall mean "including without limitation".

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Rafflebox any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

Questions or concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction. We have appointed a Privacy Officer

to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

privacy@rafflebox.ca

Attention: Privacy Officer

**If you choose to communicate with us via email, please be aware that email is not a 100% secure medium for sending any personal or confidential information to us. **