

PRIVACY POLICY

Last updated: May 17, 2020

Overview

Citizn Inc. (“CITIZN”, “we”, “us” or “our”) is committed to protecting the privacy of personal information of identifiable individuals who use the services, websites, and applications offered by CITIZN (the “Service”). This Privacy Policy describes CITIZN’s policies and procedures on the collection, use, disclosure and sharing of your information when you use the Service, via our website at citizn.world, CITIZN content embedded on another site, your mobile phone, or one of CITIZN’s applications for mobile devices and/or any other platform or media through which we make such services available from time to time.

This Privacy Policy informs you of CITIZN’s policies and practices regarding the collection and use of information you submit to us or which we collect about you through the Service and to inform you of options that you have to control or restrict the availability and use of your information. Wherever you reside or from whichever country you submit your information, you consent to our use of your information, consistent with this Privacy Policy, in Canada and in other territories where CITIZN provides the Service.

CITIZN reserves the right to change this Privacy Policy from time to time. Amendments to this Privacy Policy will be posted to the Service and will be effective when posted. Your continued use of the Service following the posting of any amendment to this Privacy Policy shall constitute your acceptance of such amendment.

In this Privacy Policy, “personal information” means any information about an identifiable individual but does not include business contact information which enables an individual at a place of business to be contacted.

Consent and Information Collection and Use

When you register as a user of our Service, we ask for personal information that will be used to ensure you are not a bot, determine that you are who you claim to be, activate your account, create a user profile, provide the Service to you, customize your user experience, communicate with you about the status of your account, and for other purposes set out in this Privacy Policy. Your name, company name (for premium users who wish to be associated with their company), telephone number, email address, postal code, and certain other information about you may be required by us to provide the Service or be disclosed by you, directly or indirectly, during your use of the Service.

By providing personal information to us and by retaining us to provide you with the Service, you voluntarily consent to the collection, use and but not disclosure of such personal information as specified in this Privacy Policy. Without limiting the foregoing, we may on occasion ask you to consent when we collect, use, or disclose your personal information in specific circumstances. Sometimes your consent

will be implied through your conduct with us if the purpose of the collection, use or disclosure is obvious and you voluntarily provide the information.

For premium users and expert analysis contributors, your name and likeness will be available for public viewing on the Service. For regular users, you also provide us information in any Content (as defined in the Terms and Conditions of Service) you post to the Service, including any comments, questions, recommendations, ratings, reviews, and other contributions on the Service, as well as metadata about them, all of which is intended for public consumption and will be publicly viewable on the Service. We may display this information through the Service, share it aggregate data that may include your data in a summary format (i.e. not personally distinguishable) with third parties, and further distribute it to a wider audience through third party sites and services. This information may also be “crawled” by third party search engines so that personal information in your Premium users’ user profile may be accessible through search engines in search results.

In addition, we may use your personal or account information for the following purposes (the “**Purposes**”):

- To provide the Service to you and to other users of the Service;
- To improve the quality of the Service through polls, surveys and other similar feedback gathering activities conducted by CITIZN and/or third parties;
- To create, manage and control your account information, and to verify access rights to the Service;
- To bill your account, if applicable;
- Subject to applicable legislation, to communicate with you, including without limitation for the purpose of providing you with information about the Service, or informing you of changes or additions to the Service or of the availability of any other services or features we provide;
- To assess service levels, monitor traffic patterns and gauge popularity of different features and service options of the Service;
- To enforce this Privacy Policy or our Terms and Conditions of Service;
- To protect against fraud or error, and to respond to claims of any violation of our rights or those of any third parties;
- To respond to your requests for customer service;
- To protect the rights, property or personal safety of you, us, our users and the public; and
- As required to comply with applicable laws or as authorized by applicable laws.

In addition, from time to time we may disclose or allow access to your personal information outside Canada where it may be subject to the lawful access requirements of the jurisdiction in which it is stored or able to be accessed. If you have any questions about our use of service providers outside of Canada, you may contact CITIZN’s Privacy Officer by email at <info@citizn.world>.

Subject to applicable legislation, we may occasionally communicate with you regarding our products, services, news and events. You have the option to not receive this information. We provide an opt-out function within all email communications of this nature, or will cease to communicate with you for this purpose if you contact us and tell us not to communicate this information to you. The only kind of these communications that you may not “opt-out” of are those required to communicate announcements related to the Service, including information specific to your user account, planned Service suspensions and outages. We will attempt to minimize this type of communication to you.

For the purposes of billing your account, CITIZN may share your credit card and other payment information with banks or other third parties, such as Paypal or Stripe in order to process payments. In addition, while CITIZN has in place up-to-date technology and internal procedures to guard such payment information against unauthorized access or intruders, there is no guarantee that such technology or procedure can eliminate all of the risks of theft, loss or misuse. CITIZN shall not be liable to you or any other person for any damages that might result from unauthorized use, publication, disclosure or any other misuse of such payment information, including credit card information.

Age of Consent

We do not knowingly provide the Service to, and will not knowingly collect the personal information from anyone under the age of consent.

Rights to Your Information

You have the right to access and edit your information that is in the custody or under the control of CITIZN at any time through the interface provided as part of the Service. In the event an access request is refused, you will be advised in writing of the reasons for the refusal and other applicable information.

Disclosure

We may disclose personal information to third parties for legitimate business purposes or for the Purposes and will obtain assurances from such third parties that they will safeguard personal information in a manner consistent with this Privacy Policy. To the extent such personal information is disclosed to third parties in other countries, those countries to which personal information will be transferred may or may not have laws that seek to preserve the privacy of personal information.

CITIZN uses services hosted by third parties in the course of providing the Service, including PayPal, Amazon, Google, email providers, and social networking sites such as Facebook and Twitter (the “**Third Party Hosts**”). To the extent any Third Party Host collects the personal information of users, such collection will be subject to the applicable privacy policies of the Third Party Hosts and shall not fall under the scope of this Privacy Policy.

Retention and Destruction

Subject to the terms of this Privacy Policy, your personal information is only retained as long as is reasonable to fulfill the purpose for which it was collected or for legal or business purposes (such as backup, archival, or audit purposes, or to improve the Service) or as otherwise required under applicable law. Notwithstanding the foregoing, and subject to applicable laws and regulations, CITIZN will retain all personal information generated by users with respect to user intercommunications, and all personal information which is posted by users to areas of the Service which are accessible to the public or other users, indefinitely.

Personal information which is used to make a decision that directly affects a specific user will be retained for at least one year after the date of that decision.[not clear what this “data use” is referring to?]

Aggregated Data

We may also use your personal information to generate Aggregated Data for internal and external use. “**Aggregated Data**” means records which have been stripped of information potentially identifying users, and which have been manipulated or combined to provide generalized, anonymous information. Your identity and personal information will be kept anonymous in Aggregated Data.

Third Parties

The Service may contain links to other sites and we are not responsible for the privacy practices or the content of such sites. We encourage you to read the privacy policy of linked sites. Their privacy policies and practices differ from our policies and practices.

Cookies and Log Files

We use cookies and log files to track user information. Cookies are small amounts of data that are transferred to your web browser by a web server and are stored on your computer’s hard drive. We use cookies to track which page variant a visitor has seen, to track if a visitor has clicked on a page variant, to monitor traffic patterns and to gauge popularity of service options. We will use this information to deliver relevant content and services to you.

Change of Ownership or Business Transition

In the event of a change of ownership or other business transition, such as a merger, acquisition or sale of our assets, your information may be transferred in accordance with applicable privacy laws.

Security

We will strive to prevent unauthorized access to your personal information, however, no data storage or data transmission over the Internet, by wireless device or over the air is guaranteed to be 100% secure. We will continue to enhance security procedures as new technologies and procedures become available.

Please remember that you control what personal information you provide while using the Service, and what personal information you choose to make available to the public through the Service. Ultimately, you are responsible for maintaining the secrecy of your identification, passwords and/or any personal information in your possession for the use of the Service. Always be careful and responsible regarding your personal information. We are not responsible for, and cannot control, the use by others of any information which you provide to them and you should use caution in selecting the personal information you provide to others through the Service. Similarly, we cannot assume any responsibility for the content of any personal information or other information which you receive from other users through the Service, and you release us from any and all liability in connection with the contents of any personal information or other information which you may receive using the Service. We cannot guarantee, or assume any responsibility for verifying, the accuracy of the personal information or other information provided by any third party. You release us from any and all liability in connection with the use of such personal information or other information of others.

Contact Us

If you have any queries about the disclosure of your personal information or if you otherwise have any questions or suggestions regarding our Privacy Policy or wish to make a complaint, you may contact CITIZN by email at <info@citizn.world>.