

Privacy Policy

Last update: January 12, 2021

Sinistar Inc. (hereinafter "**Sinistar**", "**our**", "**us**" or "**our**") acts as an intermediary between claim victims (insured), their insurance companies (including adjusters) and Sinistar's housing providers (partners).

Sinistar attaches great importance to the respect of your privacy and the protection of your personal information. We are committed to maintaining the accuracy, confidentiality and security of your personal information. As part of this commitment, this Privacy Policy (hereinafter the "**Policy**") governs our actions regarding the collection, use and disclosure of your personal information.

The personal information provided to us helps us provide quality services. When you use our services, you are accepting the practices described in this Policy.

Definitions

If you encounter a term without definition in this Privacy Policy (such as "**Listing**" or "**Sinistar Platform**"), that term will have the same definition as the one in our Terms of Use ("**Terms of Use**").

"Personal Information" means any information that relates to an identifiable individual or that, taken separately or in combination with other data, allows an individual to be identified.

Consent

Sinistar will obtain the necessary personal information directly from you, with your consent, subject to the exceptions provided for by law.

By providing us with your personal information, through our website or the Sinistar Platform (collectively, our "**Sites**"), by telephone, email or by any other means, you consent to the collection, use and disclosure of your personal information in accordance with this Policy.

Refusal to collect and withdrawal of your consent

It is your right, if you wish, to refuse the collection, use and disclosure of your personal information. You may also, at any time, and subject to reasonable notice and applicable legal or contractual restrictions, withdraw your consent regarding the use of personal information already collected by contacting Sinistar. Refusal to disclose information or withdrawal of your consent may prevent us from providing or continuing to provide you with some of our services, as the personal information is necessary for the proper management or administration of your files or the delivery of ongoing services related to your file. In such circumstances, you should be aware that we may be forced to stop providing you with a service.

What personal information do we collect?

There are two general categories of information we collect. Sinistar does not rent or sell any of your personally identifiable information to third parties, and does not share it with third parties without your consent, unless required by law or for the purposes of this Policy.

Information that is necessary to post a Sinistar Listing

We request and collect the following personal information about you when you create a Listing as a partner. This information is necessary for the proper execution of the agreement between you and us and to enable us to comply with our legal obligations. Without it, we may not be able to provide you with all the services you request.

- **Your contact information**, such as your name, email address, telephone number, so that you can create your Sinistar account, so that we can correspond with you and so

that we can forward this information to an insured when a reservation is confirmed in your accommodation ;

- **The address of your accommodation you wish to rent**, which may appear on your Listing and will allow Sinistar, insurance companies and insured disaster victims to determine the location of your accommodation for possible rental;

Information provided by the claims adjuster or the insured for the purpose of a relocation request

For the purposes of a relocation request ("**Relocation Request**") made by a claims adjuster ("**the Adjuster**") on the Sinistar Platform, by e-mail or by telephone, we request and collect the following personal information. This information is necessary so that we can respond to the Adjuster's request efficiently. Without it, we would not be able to provide the services requested to complete a relocation request successfully.

- **Information from the Adjuster.** When creating the request, we ask the Adjuster to provide us with certain information such as his first name, last name, telephone number, extension number, e-mail address and insurance company/claims adjuster's office.
- **Information of the insured.** We also collect certain information on the insured to be relocated, such as the file number with the insurance company, first and last name, address, telephone number and e-mail address.

This information is only used for the purposes of the Relocation Request, and is not shared with third parties, except when necessary for the Relocation Request. Sinistar will be able to communicate the first name, surname, telephone number and/or e-mail address of the insured to the partner that will host the insurer, especially to organize the arrival time and the entrance to the accommodation.

How do we use the information we collect?

We may use, store and process personal data to (1) improve and develop the Sinistar Platform, (2) create and maintain a trusted and more secure environment (in particular to comply with our

legal obligations) and (3) disseminate, personalize, analyze and improve our advertising and marketing of our services.

(1) **To improve and develop the Sinistar Platform.** We may use personal data to feed, improve and develop the Sinistar Platform, in particular to :

- Enable you to access and use the Sinistar Platform;
- Manage, protect, improve and optimize the Sinistar Platform, carrying out analyses and studies for example ;
- To send you support or service related messages, updates, security alerts by email;
- To manage, protect, improve and optimize the Sinistar Platform, as well as to customize and adapt your experience (for example by making Listing suggestions or ranking search results);

(2) **To create and maintain a more secure trusted environment.** We may use personal data to create and maintain a trustworthy and more secure environment, in particular to:

- Detect and prevent fraud, spam, abuse, security incidents and other harmful activities;
- Conduct security investigations and risk assessments;
- Verify or authenticate information or identification submitted by you (for example, verify your home address or compare the photo identification with another photo submitted by you);
- Conduct checks with databases or other sources of information, including a police or background check, to the extent permitted by applicable laws and with your consent, if applicable;
- Comply with our legal obligations;
- Resolve any disputes we may have and enforce our contracts with third parties;
- Enforce our Terms of Service and other policies; and;

(3) **Provide, customize, evaluate and improve our advertising and marketing of our services.** We may use personal data to provide, customize, evaluate and improve our advertising and marketing of our services, including to :

- Send you messages, marketing, advertising and other information that may be of interest to you based on your preferences (including information about Sinistar) and social network advertisements via social network platforms, such as Facebook or Google ;
- Personalize, evaluate and improve our advertising.

When and how does Sinistar share your information with third parties?

Sinistar may disclose your Information to its partners to the extent that such disclosure is required for the intended purposes. Sinistar may use third parties to facilitate its activities, such as hosting service partners, contractors to send email updates about Sinistar or to provide customer support services. In the context of these commercial activities, contractors and service partners of Sinistar may have access to your personal information collected by Sinistar to use it for a limited period of time in the context of these commercial activities. When Sinistar uses third parties to process any Information, Sinistar puts in place reasonable safeguards to ensure that such third parties keep confidential all the personal information they process.

Sinistar may also disclose your Information if required to do so by law or if Sinistar believes in good faith that such action is necessary: (a) to comply with the law; (b) to comply with an order of a competent judicial authority in any jurisdiction; (c) to comply with a legal proceeding served on Sinistar; (d) to protect and defend the rights or property of Sinistar; (e) to enforce or verify your compliance with any part of the agreements you enter into with Sinistar, if applicable ; (f) prevent fraud or any other illegal activity perpetrated through the Sinistar Platform; or (g) act in urgent circumstances to protect the personal safety of users of the Sinistar Platform or the general public.

How long will Sinistar keep your information?

Sinistar will keep your personal information only as long as necessary to achieve the purposes for which it was collected, or as required by the legitimate interests of Sinistar, or to comply with applicable legal, fiscal or regulatory requirements.

Changes to Sinistar's Privacy Policy

Sinistar frequently revises this Privacy Policy to keep it up to date with the applicable legislation and the Sinistar Platform. Updated notices may be used to inform users of recent changes and the date of the last update, but the posting of the revised Privacy Policy on the Sinistar Platform will be considered sufficient notice to you. Unless otherwise specified, the current Sinistar Privacy Policy applies to all Information that Sinistar has about you.

Security

We implement and maintain administrative, technical and physical security measures to protect your information from unauthorized access, loss, destruction or alteration. We strive to apply the necessary and appropriate security measures to ensure the confidentiality of the personal information in our possession. To do so, we follow generally accepted industry standards. The personal information that we hold is therefore accessible only to persons who are qualified to have access to it.

Non-compliance with the rules

Sinistar will take prompt corrective action when it becomes aware of a breach of this Privacy Policy. Sinistar is not responsible for any incidental, consequential or punitive damages related to this Privacy Policy.

You may file a complaint with a competent authority at any time if you believe that Sinistar does not treat your personal information in a manner that is consistent with this Privacy Policy or applicable laws.

Contact Sinistar

If you have any questions about the privacy aspects of the Sinistar Platform, if you want to file a complaint, if you want to withdraw your consent (if applicable), if you want to object to the use of your Information by Sinistar, if you want to request access to the Information that Sinistar holds about you, if you want to modify, delete or correct this Information, if you want Sinistar to stop or limit the use of your Information, or if you want to receive a copy of all the Information Sinistar has about you in a structured, commonly used and machine-readable format, please contact Sinistar at : info@sinistar.ca

Your request may be accepted or refused by Sinistar according to the applicable laws.