

Privacy Policy

SiniSTAR Inc. (“**SiniSTAR**”, “**we**”, “**us**” or “**our**”) values your privacy and the protection of your personal information.

This Privacy Policy (the “**Policy**”) is designed to help you understand how we collect, use and disclose your personal information. SiniSTAR needs to access certain personal information about you, including through your interactions with our disaster relocation services and your interactions with our websites, applications, products or services (collectively, the “**SiniSTAR Services**”)

1. What personal information do we collect?

For the purposes of this Privacy Policy, “**personal information**” means any information about an individual that allows that individual to be identified, either individually or in combination with other information.

In the course of our interactions with you, whether in the course of providing SiniSTAR services and other related services, in the course of our business, or when you communicate with us, SiniSTAR may collect your personal information, including but not limited to:

- Your name;
- Your contact information (such as an address, email address and telephone number);
- Your financial information (such as a billing address, bank account information or payment information);
- Information about your mobile and/or computer devices;
- Recruitment information (such as a resume);
- Your responses to surveys;
- Your interaction with our online content and your visits to our website, or information collected through cookies and other tracking technologies.

We do not knowingly collect information from children or others under the age of 16. If you are a minor under the age of 16, please do not provide us with any personal information without the express consent of a parent or guardian. If you are a parent or guardian and you know that your children have provided us with Personal Information, please contact us. If we learn that we have collected personal information from minor children without verification of parental consent, we will take steps to delete that information from our servers.

2. How do we collect your personal information?

Directly from you

Generally, we collect personal information that we need directly from you, for example, when you use the SiniSTAR services or when you communicate with us.

We may also collect information generated by your mobile and/or computer devices (for example, location and IP address information).

With a legal basis such as a contractual basis or your consent

The legal basis for collecting and using your personal information is typically a contractual basis (i.e., to provide you with the SiniSTAR services) or because you have consented to it. However, we may also rely on other legal grounds, for example, where the processing is necessary for our legitimate interests or for compliance with legal obligations to which we are subject.

Refusal if collection and withdrawal of your consent

You have the 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 (if any) to the use of your personal information in our possession by contacting us. You should be aware, however, that if you choose not to provide us with your personal information, this may prevent you from, for example, using the SiniSTAR Services, as this information is essential to the provision of the requested services. You may contact SiniSTAR as described in the section "How to Contact Us".

3. Why do we collect your personal information?

For specific and limited purposes

We generally collect and use your personal information to:

- Provide you with SiniSTAR services, respond to your requests for SiniSTAR services and fulfill them;
- Authenticate users of SiniSTAR services;
- Make or receive payment in connection with the SiniSTAR services;
- Communicate with you about your account and provide customer services as needed;
- Administer surveys that you agreed to complete.

To send you messages

SiniSTAR may send you messages related to the SiniSTAR services, updates, important information about your account, or other written communications such as a newsletter (the "SiniSTAR messages").

For secondary purposes

SiniSTAR may also aggregate and anonymize personal information provided by you to create statistical data that SiniSTAR may use to improve the SiniSTAR Services. This statistical data does not include any personal information.

4. Who do we share your personal information with?

SiniSTAR does not rent or sell any of your personal information to third parties and will not share it with third parties without your consent, unless required by law or necessary for the purposes set out below:

- **With our employees.** In the course of their work, our employees may need to access your personal information, for example, when you contact us or request assistance. Their access is limited to what is necessary to perform their duties;
- **With strategic partners.** SiniSTAR may use partners or service providers to facilitate its business activities (security, hosting, data analysis, payment processing, sending email updates, customer support, etc.) As part of these business activities, SiniSTAR's service providers may have access to your personal information for use for a limited period of time in connection with those business activities. We limit the information we provide to these service providers to that which is reasonably necessary for them to perform their functions;
- **When required by applicable laws.** For example, to government authorities and law enforcement agencies where required by applicable law. Specifically, we may disclose personal information and other information if we are required to do so by law or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or subpoena or government search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies;
- **During business transfers.** We may share your personal information without your permission when our business requires it (for example, in the event of a merger, acquisition, bankruptcy or sale of assets). For such events, we may also share some or all of your personal information with the relevant third party (or its advisors) as part of a due diligence process

5. How long do we keep personal information?

We will retain personal information only as long as necessary for the purposes identified in this Policy and to comply with our legal and regulatory obligations. For more information on how long we retain personal information, please contact us at the contact information provided in the "How to Contact Us" section.

6. Where do we store your personal information?

Your personal information is currently hosted in Canada, specifically in the province of Quebec.

7. How do we protect personal information?

We follow generally accepted industry standards to protect information submitted to us, both at the time of transmission and once we receive it. We maintain appropriate physical, technical or administrative safeguards to protect personal information against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, misuse or other unlawful processing of personal information in our possession. We have taken steps to ensure that the only staff members with a duty of confidentiality who have access to your personal information are those who have a need to know or whose duties reasonably require such information.

However, no method of transmission over the Internet, nor any means of electronic storage, is 100% secure. Therefore, we cannot ensure or warrant the security of any information you transmit or provide to us, and you do so at your own risk. We also cannot guarantee that such information will not be accessed, obtained, disclosed, altered or destroyed as a result of a breach of our physical, technical or administrative safeguards. If you have reason to believe that personal information has been compromised, please contact us at the contact information provided in the "How to Contact Us" section.

8. What are your rights?

Depending on applicable law, you might have the right to have your personal information erased, the right to accuracy, to obtain access to, or correction of your personal information, the right to withdraw your consent (if any), the right not to be discriminated against, the right to object to the use of your personal information by SiniSTAR, or the right to receive a copy of all personal information that SiniSTAR has about you in a structured, commonly used and machine-readable format. To exercise any of these rights (to the extent they are available to you), please contact us as set out in the "How to Contact Us" section.

9. How do we use cookies?

Cookies are small text files that a website may place on your computer or mobile device when you first visit a site or page. Cookies will help the website recognize your device the next time you visit. We use the term "**cookies**" in this Policy to refer to all files that collect information in this manner.

Strictly necessary cookies

These cookies are necessary for the operation of the website and cannot be disabled in our systems. They are generally set as a response to actions you have taken that constitute a request for services, such as setting your privacy preferences, logging in, or filling out forms. You can set your browser to block or be notified of these cookies, but some parts of the website may be affected. These cookies do not store any personally identifying information.

Functionality cookies

These cookies are used to improve and personalize the functionality of the website. They may be set by our staff, or by third parties whose services are used on our website pages. If you do not accept these cookies, some or all of these services may not function properly.

Performance cookies

These cookies allow us to determine the number of visits and sources of traffic, in order to measure and improve the performance of our website. They also help us to identify the most/least visited pages and to evaluate how visitors navigate the website. All information collected by these cookies is aggregated and therefore anonymized. If you do not accept these cookies, we will not be informed of your visit to our site.

How to manage cookies?

Each browser is configured differently to manage cookies and your choices. It is described in the help menu of your browser, which will allow you to know how to modify your wishes regarding cookies. Any settings you make may affect your ability to browse the Internet and access certain services that require the use of cookies.

You have the option of setting your devices to accept all cookies, to notify you when a cookie is issued, or to never accept any cookies. The latter option, however, may result in some personalized services not being provided and, as a result, you may not be able to take full advantage of all the features offered by the website.

If you do not wish to receive cookies in general, or wish to reject only certain cookies, you can change your browser settings appropriately.

Instructions for doing so are provided on each browser's website:

- [For Edge](#)
- [For Chrome](#)
- [For Firefox](#)
- [For Safari](#)

For any other browser not mentioned above, feel free to consult the cookie management help available on the Internet.

You can also check the link below for an overview of how to block or delete cookies on the most common browsers: <https://www.allaboutcookies.org>.

10. How to contact us?

If you have any questions or comments about this Privacy Policy or personal information, or if you wish to exercise your rights, file a complaint, or obtain information about our policies and practices regarding our service providers outside of Canada, please contact our Privacy Officer by email at privacy@sinistar.ca or by mail at the following coordinates:

Sinistar inc.
Attn: Privacy Officer
433 Boulevard Saint-Joseph Est
Montréal (Québec) Canada H2J 1J6

11. How do we update this Privacy Policy?

We frequently review this Privacy Policy to keep it current with applicable law and our business. If material changes are made to this Policy, update notices (such as online notices or emails) may be used to notify you of such changes. Otherwise, the posting of the revised Privacy Policy on the SiniSTAR Services will be considered sufficient notice to you, and by continuing to use the SiniSTAR Services, or by submitting Personal Information to us, you consent to any changes to our Privacy Policy.

This policy was last updated on April 28, 2023.