



SureWx PRIVACY POLICY

1. Introduction

SureWx Inc. (“**We**”, “**Our**”, “**Us**”) is one of the world’s largest providers of electronic data solutions for aircraft ground deicing and airport winter operations. Our goal is to provide a user-friendly interface to power an integrated suite of core holdover time solutions delivered electronically at various stages during the pre-flight process to support flight crew decisions, including a wide range of data management solutions. Because We respect the right to privacy, We have developed this Privacy Policy (“**Privacy Policy**”) to inform users (“**You**”, “**Your**”) about Our privacy practices regarding the data collected in relation to the use of Our website, located at surewx.com and holdovertime.com (the “**Website**”) and Our web-based and mobile applications (the “**Applications**”). The Website and Applications may be used to directly or indirectly distinguish, identify, or contact a specific individual (“**Personal Information**”). We may collect and store Personal Information in order to provide access to and use of the Website and Applications.

2. Scope of This Privacy Policy

In keeping with Our commitment to Your privacy, this Privacy Policy will apply to:

- The type of information We collect, use, and disclose;
- How the information We gather is used and to whom it is disclosed;
- Your ability to opt-out of future notifications and withdraw consent;
- Security procedures We have put in place to protect Your information from loss, misuse, or alteration.

3. Our Commitment to Privacy

We recognize the importance of privacy and are committed to protecting the privacy of all of those who use Our Website and Applications. This Privacy Policy sets out our practices regarding the collection, use and disclosure of Personal Information in connection with the Website and Applications. If You are using the Website or the Applications, You may be asked to provide Personal Information. Please note, that We are asking for this information for the limited purposes as defined in this Privacy Policy. By using Our Website or Applications, You consent to Our collection, use, and disclosure of Your Personal Information in accordance with the terms of this Privacy Policy. We do not sell the information You provide to any third party.

4. Application

This Privacy Policy applies to all information We collect for the purpose of providing access to and use of the Website and the Applications. We may require the involvement

of trusted third parties required to facilitate the provision of the Website and the Applications. We strive to provide the highest level of privacy possible, and therefore require that any third parties offer no less protection than that offered in this Privacy Policy and as otherwise required by law to meet the data protection requirements of Canada's federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

4.1 GDRP Compliance: To the extent that We process Personal Information belonging to data subjects residing in the European Economic Area (“**EEA**”), We comply with the General Data Protection Regulation 2016/679 of European Parliament and of the Council of 27 April 2016 (“**GDPR**”) and recognize that as a resident of the EEA, You have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us at legal@surewx.com.

We process Your data, including Personal Information in accordance with the GDPR guidelines and implement appropriate technical measures to ensure a level of security appropriate to the risk, considering the nature, scope, context, and purpose of processing any Personal Information as outlined in this Privacy Policy.

5. Information We Collect from You

5.1 How We Collect Information from You: We collect information from You when You interact with the Applications through:

- **Access and Use of Our Applications:** To access or use Our Applications, You may be required to provide certain information, such as your business email address, flight identifier and location.
- **Communicating with Us.** You may disclose information to Us via direct email or verbal communication in connection with the Website and Applications.
- **Visiting the Website.** When You visit the Website, We may collect non-identifiable statistical information about Your visit.

5.2 Personal Information: We may collect Personal Information from You that You voluntarily submit to Us, including information that You provide when engaging with the Applications. We do not collect any Personal Information from a visitor to Our Website unless that visitor explicitly and intentionally consents to providing it. Under no circumstances do We collect any sensitive personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, or sexual orientation. If You are simply browsing our site, We do not gather any Personal Information about You.

Personal Information will only be collected for specific identified purposes and consented to at the time of collection or as otherwise outlined in this Privacy Policy.

5.3 Collection of Aggregate Data: We may aggregate and anonymize data related to the use of Our Applications such that this data is not personally identifiable to any individual user on its own or in combination with other data sets (“**Aggregate Data**”). We may use Aggregate Data to improve the Applications or provide other products and services, create derivative or new products, develop analytics, or for other research purposes.

5.4 Location Data: The features of the Applications are facilitated by the input of numerous automated sensors that continuously measure airport weather conditions. The Applications may require that a location, airport, or weather parameters be inputted manually to ensure full functionality (“**Location Data**”). We only use this data to provide You with the features of the Applications, as well as other research purposes related to performance and development.

6. Purposes for Which We Collect and Use Your Information

6.1 Facilitating the Use of Our Applications: When you interact with the Applications, We may collect Your business email address and location information from You. We use this information only to operate, maintain, and provide You with the features and functionality of Our Applications.

6.2 Communicating with You: We may use the information that You disclose to Us to communicate directly to You to respond to any inquiries (e.g., support requests) or service-related email notifications (e.g., technical and security notices). This communication is necessary for our legitimate interests, namely administering the Applications and communicating with You in relation to the Applications. We may also use Your information to send You communications regarding news, alerts, and marketing communications. We will only process Your Personal Information in this manner to the extent that You have given Us consent to do so and will only communicate with You in accordance with applicable anti-SPAM legislation.

6.3 Third Party Related Services: Third party vendors and other service providers may be required for Our Website and Applications, including web hosting, email, and other similar service providers. Please note, that this information is only used to facilitate these services. We do not disclose any information to third parties through Our Applications or Website without Your consent.

7. Consent to the Collection of Personal Information

We collect and use Your Personal Information only with Your meaningful legal consent, except as otherwise permitted or required by law. The consent provided for the use of Personal Information is for the specified, explicit, and legitimate purposes as outlined in



this Privacy Policy, and/or as otherwise specified prior to Your providing express consent. You may withdraw Your consent to the use of Your Personal Information by contacting Our Privacy Officer by emailing legal@surewx.com. When We collect information from You, You will be given the opportunity to opt-out of receiving further information from Us or any associated third party. We will explain the consequences if You decide to withdraw Your consent for Us to use Your Personal Information. Any request to withdraw consent will be processed within the legally required time periods.

You may explicitly and intentionally provide Us with, and consent to, Our collection of certain information, including Personal Information by:

7.1 E-Mail Request for Information: We use links placed on Our Website to provide You with the opportunity to contact Us via e-mail to ask questions, request information and materials, or provide comments and suggestions. You may also be offered the opportunity to have one of Our representatives contact you personally to provide information about Our Applications. To do so, We may request additional Personal Information from You, such as Your name, and other business contact information, such as Your email address, and/or telephone number, to help Us satisfy your request.

7.2 Downloading and Using the Applications: If you choose to download and/or use the Applications, We will request certain information from You. For certain Applications, We may require Your business email address, flight identifier and location.

By corresponding with us, downloading, accessing, or otherwise using the Website and Applications, you consent to Our collection, use, and disclosure of your Personal Information in accordance with the terms of this Privacy Policy.

8. New Consent Required

In the event that Personal Information is required for a new purpose, We will disclose the new purpose and request consent to collect Personal Information.

9. Withdrawal of Consent or No Consent Provided

You can withdraw Your consent to the collection, use, and disclosure of Your information, including Personal Information at any time by contacting Us and informing Our Privacy Officer at legal@surewx.com. Please note that Your withdrawal of consent may impact Our ability to provide You with access to or full functionality of the Applications.

9.1 Protection of Children's Privacy: We do not knowingly collect personal information from children under the age of 16. If We become aware that We have inadvertently gathered Personal Information from a child under the age of 16, we will delete that information from Our system.

10. Disclosure without Consent

We will only disclose Your Personal Information without consent to third-parties, government authorities, or law enforcement to the extent that We are permitted or required to do so by law.

11. Accuracy of Collected Information

We implement policies and procedures to ensure that the Personal Information in Our possession is accurate, complete, and up-to-date. You can submit updates to Your Personal Information to Our Privacy Officer at any time.

12. Access to Personal Information

An individual may request access to the Personal Information that We hold about themselves at any time. We will respond to requests for access promptly and within the legally mandated time frame subject to any refusals permitted or required by law. Any refusals to grant access will be accompanied by associated reasons and information regarding available recourse. Requests for access to Personal Information can be directed to Our Privacy Officer at legal@surewx.com.

13. Retention of Personal Information

We retain Personal Information only for as long as needed to perform the purposes identified in this Privacy Policy. Once Personal Information is no longer required for the purpose for which it was collected, We will apply all commercially reasonable safeguards to safely and securely destroy said Personal Information.

14. Public Access of Our Website

We provide public access to information regarding Our services, activities, and the Applications via the Website.

14.1 Statistical Information About Your Visit: When You visit Our Website, We may automatically collect statistics about Your visit. This information does not identify You personally, but rather provides Us with information about Your visit to Our Website. We may monitor statistics such as how many people visit our site, user IP addresses, which pages people visit, from which domains our visitors come, and which browsers people use. We use these statistics about Your visit only to help Us improve the performance of the Website.

14.2 Use of Cookies: We only use "cookies" as described in this section. A "cookie" is a piece of information that our Website sends to Your browser, which

then stores this information on Your system. Cookies are required to access the features of Our Website. When Your browser window is closed; however, the cookie is automatically deleted from Your system. You should be aware that cookies contain no more information than You volunteer, and they are not able to access Your hard drive and return to the sender any personal or other information from Your computer.

You have the option to restrict or deny the use of cookies on the Website through Your browser settings; however, this may result in the inability to access or otherwise interfere with the use of the Website.

15. Security Procedures and Safeguards

We consider the protection of all Personal Information We receive from You to be critical. Please be assured that We have security measures in place to protect against the loss, misuse, and alteration of any information We receive from You in accordance with applicable Canadian laws.

15.1 Procedural Safeguards: We maintain physical, electrical, and procedural safeguards in connection with the collection, disclosure, storage, use, and deletion of Personal Information. Proof of identity may be required upon request to disclose Personal Information to You.

15.2 Technological Safeguards: As with any transmission over the Internet, there is always some element of risk involved in sending Personal Information. To try and minimize this risk, we use the most up-to-date security protocols to encrypt all information submitted through our Applications and Website.

15.3 Personnel Safeguards: Restrictions to access to Personal Information at the personnel level include restricted access to physical locations in which Personal Information is held, as well as technological protections (e.g., passwords). Disclosure and access to Personal information by personnel is limited to the extent required to reasonably fulfill the specific purposes for which it was provided.

16. Notification of a Security Breach

In the event of a security breach of the above-mentioned safeguards involving Personal Information in Our control presents a real risk of significant harm, notice of the breach will be provided without undue delay to the affected individual(s). In the case of EEA residents, notification will be provided within 72 hours.

17. Changes to This Privacy Policy

We may revise or update this Privacy Policy from time to time. If a material change is made to this Privacy Policy and/or the way We use Your Personal Information or other



data, We will post prominent notice of the nature of such changes on the first page of this policy. A copy of this Privacy Policy will be available on Our Website. We recommend that you review this Privacy Policy each time you access the site for any new changes.

18. Inquiries Regarding This Privacy Policy

Questions, complaints, or requests for further information regarding this Privacy Policy or Our practices related to the collection of Personal Information should be directed to the Privacy Officer at legal@surewx.com. Please specify "Privacy Policy" in the subject line of Your email. All complaints We receive related to Personal Information are investigated. We will reply within a reasonable period and no later than one month.

This Privacy Policy was last modified on March 27, 2023.