

## Website Privacy Policy

Last modified: June 5, 2023

### **INTRODUCTION**

TUHRN Policy Solutions Inc. (“**Company**” or “**We**”) respects your privacy and is committed to protecting it by complying with this policy. This privacy policy coincides with the Personal Information Protection and Electronic Documents Act (R.S.C. 2000, c.5) (“**PIPEDA**”) of Canada.

This policy describes:

- How we collect, use, disclose, and protect the personal information of our partners (“**Customers**”) and website users (“**you**”).
- Describes the types of information we may collect from you or that you may provide when you visit the website <https://TUHRN.com> (our “**Website**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy laws in Canada generally define “personal information” as any information about an identifiable individual, which includes information that can be used on its own with other information to identify, contact, or locate a single person.

This policy applies to information we collect, use, or disclose about you:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- From the Google Form (“**Website form**”) containing your submitted information.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for those policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

This policy DOES NOT apply to information that:

- We collect offline such as from a phone call or text message.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use

your Website. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time. Your continued use of this website after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.

### **INFORMATION WE COLLECT ABOUT YOU**

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, and personal comments submitted via the form.  
We provide an opportunity for any user to unsubscribe from our customer correspondence via the Google Form by emailing to [info@TUHRN.com](mailto:info@TUHRN.com).
- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical information or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your Internet connection, the equipment you use to access our Website, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call the Company.
- **Business or other organization mentioned in submitted Website form**, including a description of the business or organization (such as a non-profit organization, political party, government agency, etc.) and the issues or concerns related to the business or organization mentioned within the submitted Website form.

### **HOW WE COLLECT INFORMATION ABOUT YOU**

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in our Website form or corresponding with us by phone, email, or otherwise.

- **Automated technologies or interactions**, as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, and other tracking technologies.

### Information You Provide to Us

The information we collect directly from you on or through our Website may include:

- Information that you provide by filling in our Website form. This includes information at the time of submitting a request for an inquiry, consultation, or requesting further services. We may also ask you for information when you report a problem on our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Information relevant to your business, organization, political party, government agency, or other entity which you have mentioned and discussed within the form submitted on our Website.

### Information We Collect Through Cookies and Other Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and Internet connection, including you IP address, operating system, and browser type.

The information we collect automatically is statistical data and may include personal information and we may maintain it or associate it with personal information we collect in other ways, that you provide to us, or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies)**. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Flash cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies.
- **Web beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those page or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To carry out our obligations and enforce our rights from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To improve our Website, products or services, marketing, or customer relationships and experiences.
- To better understand the needs of you and your business, organization, or other entity as mentioned within your submitted Website form.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

### **DISCLOSURE OF YOUR INFORMATION**

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Cwihun Strategic Solution Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Cwihun Strategic Solution Inc.'s about our customers and users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.

- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our contractual obligations as agreed to at the time of the relevant contract's signing.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Cwihun Strategic Solutions Inc., our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **TRANSFERRING YOUR PERSONAL INFORMATION**

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may also process, store, and transfer personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

### **CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of several third party ad servers' and

networks' cookies simultaneously by using an opt-out tool created by the Digital Advertising Alliance of Canada or an opt-out tool created by the Network Advertising Initiative. You can also access these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on you device. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

### **DATA SECURITY**

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us via the submitted Website form within the relevant Google Form database.

Unfortunately the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

### **CHILDREN UNDER THE AGE OF 13**

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any other name you may use. If we learn that we have collected or received personal information from a child under 13 regardless of whether such information was with or without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

If you want to review, verify, correct, or withdraw consent on the use of your personal information you may also send us an email at [info@TUHRN.com](mailto:info@TUHRN.com) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may charge you a fee to access your personal information, however, we will notify you of any fee in advance.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse or provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

We will provide access to your information, subject to exceptions set out in the applicable privacy legislation. Examples of such exceptions include:

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that is about another individual that would reveal their personal information or confidential commercial information.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact Matthew Cwihun at [info@TUHRN.com](mailto:info@TUHRN.com).

## **WITHDRAWING YOUR CONSENT**

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [info@TUHRN.com](mailto:info@TUHRN.com). Please note that if you withdraw your consent we may not be able to provide you with an appropriate response to the inquiry you originally submitted on the Website form. We will explain the impact to you at the time to help you with your decision.



### **CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on our Website with a notice that our privacy policy has been updated or amended. If we make material changes to how we treat our users' personal information, we will notify you by a notice on our Website and in some cases personal emails to our customers.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliberate email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### **CONTACT INFORMATION AND CHALLENGE COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

[info@TUHRN.com](mailto:info@TUHRN.com)

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact Matthew Cwihun using the contact information listed above.