

Ticoon Technology Privacy Policy

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Privacy Commitment

Ticoon is committed to protecting the privacy and confidentiality of the personal information that we collect, use and retain in our web-based application (the "Ticoon Service", and our website, the "Site"). The following Privacy Policy spells out our responsibility and your rights as a user of our web-based application regarding the collection, use and disclosure of your personal information.

You must accept our Terms of Use (the "Terms of Use") and this Privacy Policy when you become a user of the Ticoon Service. You can see our Terms of Use here:

Terms of Use for [TicoonTouch](http://www.ticoon.com/1-terms-of-use/): <http://www.ticoon.com/1-terms-of-use/>

Terms of Use for [TicoonSales](http://www.ticoon.com/2-terms-of-use/): <http://www.ticoon.com/2-terms-of-use/>

Capitalized terms that are used but not defined in this Privacy Policy have the meanings given to them in the Terms of Use.

Privacy Policy

WHAT "PERSONAL INFORMATION" DO WE COLLECT?

"Personal information" is information about an identifiable individual. In the course of providing the Ticoon Service we collect various personal information about our users:

When you first become a registered user of the Ticoon Service we collect various identifying information about you, including name, address and other information that is described on the account creation pages of the Site (in our Terms of Use we call this "Registration or Subscription Data");

- When you use the Ticoon Service you have the ability to enter personal information in the Site. This information is described in the various forms on the Site, but may include the names of your past and future Financial Product and Service Providers, and the details of your past and future transactions with them, including the details of your financial transactions with them and your holdings of Financial Products;
- If you configure your account with us to do so, your Ticoon account can be associated with your account on certain other websites, including social media websites, and you can authorize us to receive certain information about you from those websites;
- If your Financial Product and Service Providers are our customers they may provide to us certain information about you and their dealings with you in order to allow us to match your account with them to your account with us. This information may include your personal information, records of your transactions with them and specific details regarding your Financial Products held with them or communicated by you to them;
- If you configure your account with us to do so, your Ticoon account can be associated with your accounts with your Financial Product and Service Providers who are our customers, and you can authorize us to receive certain information about you from your Financial Product and Service Providers;
- We use cookies and log data in the operation of the Ticoon Service. First, we use "persistent" cookies to save your login information for future logins to the Site. Second, we use "session ID" cookies to enable certain features of the Site, to better understand how you interact with the Site and to



monitor aggregate usage by our users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site and close your browser. We do not link the information we store in cookies to any personally identifiable information you submit while on our Site. Also, when you use our Site, whether as a registered user or a non-registered user, our servers automatically record information that your browser sends and records information about your use of our Site (“log data”). This log data may include information such as the browser type or the webpage you were visiting before you came to our Site, pages of our Site that you visit, the time spent on those pages, information you search for on our Site, access times and dates, and other statistics. We use this information to monitor and analyze use of the Site and the Site’s technical administration, to increase the Site’s functionality and user-friendliness, and to better tailor our Site to our visitors’ needs. For example, some of this information is collected so that when you visit the Site again, it will recognize you and the information could then be used to serve advertisements and other information appropriate to your interests. We also use this information to verify that visitors to the Site meet the criteria required to process their requests.

COLLECTING, USING AND DISCLOSING YOUR PERSONAL INFORMATION

WHY DO WE DO IT?

Ticoon collects personal information in order to provide you with access to and use of the Ticoon Service. We only collect the personal information we need to do this. Specifically, we collect, use and disclose your personal information to:

- Verify you as a user of the Ticoon Service;
- Provide the Ticoon Service to you and anyone whom you give permission to access your account(s) and information;
- Send you emails or messages through the Site that offer you new products or services (you may unsubscribe from this feature at any time);
- Allow Financial Product and Service Providers to send you emails or messages through the Site that offer you new products or services through the Site (you may unsubscribe from this feature at any time);
- Receive your personal information from your Financial Product and Service Providers who also use the Ticoon Service, so that we can provide you and them with the Ticoon Service in relation to your use of their Financial Products.
- Share your information with third parties with whom you authorize us to share that information (including social media and other websites), and in particular, with your Financial Product and Service Providers who also use the Ticoon Service, so that we can provide you and them with the Ticoon Service in relation to your use of their Financial Products. The personal information that we share with these third parties, including your Financial Product and Service Providers, and how we share it with them, is described on the Site, and through the Site you control whether and how your personal information is shared with such third parties;
- Provide to you the services offered by the Site; resolve service and billing disputes; troubleshoot problems; bill any amounts due from you; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our Terms of Use; provide you with system or administrative messages, and as otherwise described to you at the time of collection.
- Improve our content and product offerings, and to customize the Site's content, layout, and services.
- If you wish to subscribe to our newsletters, we will use your name and email address to send the newsletter to you. Out of respect for your privacy, we provide you a way to unsubscribe in the email. If you wish to no longer receive our newsletters you may update the settings in your account, follow the instructions located in the email, or you may contact the Ticoon Privacy Officer by any of the methods identified at the end of this document.



- Track and analyze anonymized and aggregated usage and volume statistical information to monitor system performance and conduct market research; and
- Report to regulatory and industry agencies, as required by law.

We may also disclose your personal information as follows:

- **ANONYMIZED AGGREGATE DATA**
We aggregate and anonymize Site use information and disclose such information in a non-personally identifiable manner to Users and others. However, in these situations, we do not disclose any information that could be used to identify you personally.
- **PUBLIC DISPLAY OR DISPLAY TO OTHER USERS**
If you post on our forum or blog your username and other information you include is displayed in your postings or comments, and is therefore available to the public. All of your activities in the public areas of the forum will be identifiable to your User ID, and other people can see your published content. When you register through the Site and submit personal information to create a User profile or a collection, other users will see your name. If you choose to provide additional personal information in your profile, other users will see that additional personal information, including, but not limited to, your photo, location, website and biography. Providing additional personal information is voluntary. We recommend that you avoid disclosing any information you consider sensitive and confidential.
- **SUBSIDIARIES AND AFFILIATES; SERVICE PROVIDERS**
We may from time to time use the services of affiliates, subsidiaries and unrelated service providers in the operation of the Site, and may disclose personal information to them in the course of our use of their services. For example, we may use the services of third-party hosting companies to host the operation of the Site. This may involve the hosting of data, including personal information, on servers operated by those hosting companies. We take care to use only service providers that we believe are reputable and able to live up to our and your expectations, including about the handling of confidential information. These companies are authorized to use your personal information only as necessary to provide these services to us.
- **LEGAL REQUESTS AND BUSINESS TRANSITIONS; EMERGENCIES**
We may disclose any of your personal information in our possession if we believe it necessary or appropriate to do so (a) to respond to any governmental authority as part of an investigation to determine our compliance with any applicable law, rule, or regulation (including privacy laws, rules, and regulations), (b) in response to a court order, subpoena, discovery request or other lawful request, or judicial or administrative proceeding, (c) as otherwise required under any applicable law, rule, or regulation, (d) to protect or defend our rights or property and that of other users, or (e) if we are involved in a merger, acquisition, or sale of all or a portion of its assets (you will be notified via email and/or a prominent notice on our Site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information).

Personal information may be collected, used or disclosed for any of these "Identified Purposes" set out above. If your personal information is not needed for one of the Identified Purposes, we will not use or disclose it without obtaining additional consent from you.

MESSAGES THAT YOU MAY RECEIVE AS A RESULT OF USING OUR SERVICE

In the course of providing our Service to you we may from time to time send messages to you, via email or through the Site, and may also permit certain third parties to do so. In general, except for certain



messages that are necessary for the safe and effective operation of the Site (such as system maintenance alerts, account status messages, new feature alerts, and so on), you can unsubscribe from these messages at any time, either through an unsubscribe link within the message, or through your account dashboard on the Site. Please note that we cannot control the use by third parties, including your Financial Product and Service Providers, of your contact information. You should refer to their privacy policies for more information about how they use your contact or other information.

HOW CAN YOU WITHDRAW YOUR CONSENT?

You may withdraw your consent to our collection, use or disclosure of your personal information at any time by contacting our Privacy Officer. Also, in some cases you can unsubscribe or opt-out from certain uses of your information (such as communications) through the Site. Please check the Site for details.

Once your request to withdraw consent is processed we will no longer provide your personal information to your Financial and Product Service Providers, or publish it in any of the public areas of the Site. However, please note that if we do this, you can no longer use the Ticoon Service. Please also note that (i) we have the right to provide to your Financial and Service Providers archival or other copies of your information that at your request they previously provided to us; (ii) at present, withdrawal of consent does not permanently delete all of your personal information from our records – in the operation of our Service end user personal information is deeply integrated into our systems, in a variety of databases, both in original form and in compilations or reports, and in both operational databases and in backup archives; and (iii) withdrawal of consent does not delete your personal information from the records of your Financial Product and Service Providers – you should refer to their privacy policies for more information on managing your personal information with them. With respect to clause (ii), we are working towards the ability to permanently delete end user personal information from our systems on request by the end user, and we will update this Privacy Policy when we have the ability to do so.

To withdraw your consent, you should contact our Privacy Officer at the address or telephone number listed below. Unless we hear otherwise from you, you are giving to us your consent for the collection, use and disclosure of personal information as provided in this Policy for the Identified Purposes.

KEEPING AND PROTECTING YOUR PERSONAL INFORMATION

- **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**
Your personal information is retained while you are a user of the Ticoon Service, and after that time as specified above.
- **HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**
Ticoon maintains strict security systems to safeguard your personal information from unauthorized access, disclosure or misuse. As well, when we no longer need your personal information, we take as much care to destroy it as we do when storing it.

YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION

You have a right to access the personal information you have entered into our web-based application at anytime using the login provided to you. If the Ticoon web-based application is inaccessible for maintenance or other reasons, you will be required to wait until the system is operational before you can access your information.

- **FINANCIAL PRODUCT AND SERVICE PROVIDERS**
As described above and in our Terms of Use, the Ticoon Service works in conjunction with our users' Financial Product and Service Providers. As a result, we obtain user personal information from them,



and provide user personal information to them, as described in this policy and our Terms of Use. Our agreements with them require them to comply with our Privacy Policy unless they have a separate consent from you to use their personal information, we have no control over their use of your personal information. For more information about their use of your personal information, please see their privacy policies. If a Financial Product and Service Provider ceases to be our customer, we terminate their access to our information, including information we have about our users, and our agreements with them require them in that event to cease using the information they have received from us about our end users, but we have no control over their use of that information.

UPDATES TO THIS PRIVACY POLICY

If we change this Privacy Policy we will do so in accordance with the Terms of Use. Please see the Terms of Use for more information. This Privacy Policy will always bear a “last updated” date at the top.

HOW TO CONTACT US

Please direct any queries about this policy to Ticoon's Privacy Officer at the telephone, e-mail address, or mailing address listed below.

If you have a complaint related to this Privacy Policy or any of our procedures, contact our Privacy Officer. If your complaint is justified, we will take the steps necessary to resolve the issue, including amending our policy and practices, if necessary.

For more information, to file a complaint or to make enquiries, please contact Ticoon's Privacy Officer:

Address: Ticoon Privacy Officer
56 The Esplanade, Suite 404
Toronto, Ontario, M5E 1A7
Telephone: (416) 513-9524
Fax: (416) 513-9525
Email: privacy@ticoon.com
Website: www.ticoon.com