

Revelstoke Security Inc. Public Facing Privacy Statement

Version 1.0.3

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Introduction

This policy protects the personal information and data subject rights of customers or external users of Revelstoke Security Inc. products and services by clearly explaining the following:

- What personal information we need (and why we need it)
- How we protect your personal information and data subject rights
- How to request and access your personal information
- How to give, deny or withdraw consent to use your personal information
- How to give, deny or withdraw consent to collect and use their personal information or make complaints.
- Be notified, without unnecessary delay, in the event your personal information leaks to an unauthorized third party.

This policy applies to all personal information stored on systems and media that are owned, leased, or otherwise provided by Revelstoke Security Inc., regardless of location.

Personal information we may need (and why we need it)

We may collect and process these examples of information (at times we may also need to collect other personal information that isn't listed here):

- Personally Identifiable Information
- Software Analytics

Protecting your information

Revelstoke Security Inc. has an appointed a Security Officer responsible for your rights as a data subject. We have appropriate technical and organizational measures to protect your information. We will handle and protect your information in line with these data protection principles:

- Personal information must be processed fairly and lawfully.
- Personal information must be obtained only for one or more specified and lawful purpose(s) and will not be processed in a manner that is not compatible with that purpose(s).
- Personal information must be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
- Personal information must be accurate and kept up to date when necessary. personal information must not be kept for longer than is required.
- Personal information must be processed in accordance with your rights as a data subject as set out in the privacy regulation(s) ("GDPR"), ("PIPEDA") or ("CCPA").
- Appropriate technical and organizational measures must be in place to protect personal information from unauthorized or unlawful processing and accidental loss, damage or destruction.
- Personal information will not be transferred to a country or territory outside of your country unless we can be assured there is an adequate level of protection of your personal information.
- Any changes, updates to any controls in place to protect your personal information will be communicated to you in writing.

Inventory Personal Information

In order to protect personal information, Revelstoke Security Inc. keeps an accurate inventory of all personal information that is collected, processed or stored and transferred by Revelstoke Security Inc.

Cookie Banner

Cookies are little pieces of data that a website will store on your computer that allow the website to remember a user by the device they use. This may allow a website to remember the state the user left when they closed the browser or to track information about the user's experience with the website. Some cookies are used to track other analytics about the user's experience on the website, such as which pages they viewed, what links they clicked or how long they spent on a certain page. Revelstoke Security Inc. uses cookies to track various information about your use and personal experience with the Revelstoke Security Inc. website and do so only with acquiring your consent with help from a cookie banner.

We may track, with your consent, the following details about your experience with our website:

- Tracking Preferences
- Authentication and Security
- Process Functionality
- Advertising
- Session State
- Various Analytics

Special Considerations for California residents

As a California resident you have the following rights:

- To opt out of your data being sold, disclosed or traded for services in kind.
- To having a clear and conspicuous option to give or deny consent to your information being disclosed or sold.
- Should you choose to opt out of the collection or use of your personal information, you have the right to acquire the same service or product offering as one who has opted in.
- You have a private right of action which allows you to seek statutory or actual damages in the event that a data breach occurs and is a result of a lack of reasonable security measures. This means that whether or not there was actual loss to you as a person, when your information is leaked as a result of poor security, you have the right to sue or join a class action to pursue damages.

Accessing your information (Subject Access Requests)

You are entitled to ask for a copy of the personal information that we hold about you and to have any inaccuracies in your personal information corrected. When you submit a request for your personal information, you are entitled to:

- Know what personal information Revelstoke Security Inc. is processing or has processed.
- Know the reason(s) and purpose(s) for the processing of their personal information.
- Know if their personal information has been shared and if so with whom and for what purpose(s).

Process for submitting a Subject Access Request

The process for submitting a Subject Access Request is as follows:

- Requests for your personal information are submitted to Revelstoke Security Inc. by email.

How to give, deny or withdraw consent or make complaints

Implicit consent is given if the user, uses the services offered by Revelstoke Security Inc. once the cookie banner has been displayed.

Explicit consent is given after reading and agreeing to the privacy policy on Revelstoke Security Inc. website which is publicly available.

Explicit consent is denied if the privacy policy is not read and agreed to, or a customer uses contact information or a form of the Revelstoke Security Inc. website to request their consent be withdrawn. Revelstoke Security Inc. will never assume or imply consent to persons under 16 years of age.

Explicit consent can only be given freely if the data subject is 16 years of age or older.

Children between 13 and 16 must explicitly opt-in before their information is processed or stored for use and we ask that parental or guardian give explicit consent beforehand.

Children under 13 will not have their personal information processed or stored for use by Revelstoke Security Inc.

Privacy compliance complaints can be made to the following email address:

privacy@revelstoke.io

Correct inaccuracies to your personal information

You have the right to correct any inaccuracies identified in your personal information we collect. Revelstoke Security Inc. provides the ability for you to correct inaccuracies in your personal information.

Right to be forgotten

You have the right to request that your information be deleted and that you be forgotten entirely from our records, unless there is a legal basis for keeping records, such as financial transactions and tax purposes.

Leak and Breach Notification

Anyone whose personal information has been leaked or is included in a breach has the right to be informed in a reasonable timeframe, once the leak or breach has been discovered and if the personal information leaked was leak in an unencrypted form.

Notifying anyone of a leak or breach will be expedited if the personal information lost poses a real risk of significant harm to the individual. This type of personal information is referred to as sensitive information. The person whose personal information that has been leaked will be informed of possible consequences that could result from the leak.

Sensitive information that could pose a real risk of significant harm to an individual includes but is not limited to information that could result in the following:

- bodily harm
- humiliation
- damage to reputation or relationships
- loss of employment
- loss of business or professional opportunities
- financial loss
- identity theft
- negative effects on the credit record
- damage to or loss of property

Statement of Confidentiality

The information contained in this document is confidential and proprietary to Revelstoke Security Inc., its subsidiaries, and/or affiliates. Revelstoke Security Inc. provides this Policy with the understanding that it will be held in strict confidence by those to whom it is provided, and that such Policy shall not be disclosed, duplicated or used, in whole or in part, for any purpose other than that specified by Revelstoke Security Inc. This work is copyrighted, and no part may be reproduced by any process or party, nor may any other exclusive right be exercised without the express written permission of a company officer of Revelstoke Security Inc.

Inquiries

Privacy Officer – Joshua McCarthy ***josh@revelstoke.io***