

PRIVACY POLICY STATEMENT

This Policy was last updated on Jan 30, 2024.

Strucwise Inc. (“Strucwise”, hereinafter referred to as “we” or “our”) respects your concerns about privacy. This Privacy Policy Statement (“Policy”) explains what personal information we collect through our websites and online services, how we use that information, to whom we disclose it, and how we safeguard personal information. Unless indicated otherwise, this Policy applies only to personal information collected through the websites, microsites, mobile applications, and other online services of Strucwise that expressly adopt, display or link to this Policy, and then only to the extent indicated (collectively, the “Services”).

WHAT INFORMATION DO WE COLLECT AND WHAT DO WE DO WITH IT?

1. Information You Provide

When you visit our Services, you may provide us with certain personal information, such as your name, address, phone number, email address, personal preferences, payment card number, purchase and ordering information, demographic information, responses to survey questions and any other information you choose to provide. Our Services may also give you the option to upload or share pictures or videos of yourself and others.

2. Information Your Devices Provide Automatically

When you interact with our Services, we also obtain information by automated means, including the following:

a. Location Information

We may obtain information about your location when you access or use our Services: for example, via your browser information and other similar device or browser attributes (like IP address), our store locator page, or our mobile applications.

b. Navigational Information

When you access our Services, your computer, phone, or other device may provide navigational information, such as browser type and version, service-provider identification, IP address, the site or online service from which you came, and the site or online service to which you navigate.

c. Device Information

We also may obtain information about the computer or mobile device you use to access our Services, such as the hardware model, operating system and version, identification numbers assigned to your mobile device, such as the ID for Advertising (IDFA) on Apple devices, and the Advertising ID on Android devices, mobile network information, and website or app usage behavior.

d. Cookies, Clear Gifs and Similar Technologies

To better understand how you interact with our Services, we may collect information using cookies, clear-gifs (also known as web beacons or web bugs) and similar technologies.

A cookie is a small amount of data that's stored by your browser on your device. It's used to do things like see how you navigate our Services, what you click on, remember you and your past interactions with the Services. This helps us improve and deliver our Services, provide better customer service, tailor and improve your user experience.

A clear gif is a nearly invisible pixel-sized graphic image on a web page, web-based document or email message. It helps us do things like view the URL of the page on which the clear gif appears and the time the site, document or email in question is viewed; and recognize you and serve any user preference you had previously indicated, when you navigate from a third party's site. Clear gifs in emails help us confirm the receipt of, and response to, our emails, including those that you forward to friends and family; and they help deliver a more personalized or better user experience.

In addition to cookies and clear gifs, we may also use device identifiers, web storage, and other technologies to collect information about your interactions with our content and Services.

These technologies, illustrated above, may be used to help us see which of our interactive experiences online users like most. Cookies, clear gifs, and similar technologies also allow us to associate your online navigational information and purchases and interactions (both online and offline) with personal information you provide (such as name, address, phone number, survey responses, and email address). We associate this information to deliver products and services to you; improve our business; transact business; and market our products and services on this and other online services, and through a variety of media like email and mobile advertising.

3. Information Derived Through or Provided By Others

Affiliated entities, vendors, social media networks, and advertising networks may provide us with, or supplement, information about you. We may use this information for a variety of operational or marketing purposes, such as to deliver more relevant user experience to you

4. How We Use the Information We Obtain

We use the personal information we obtain through our Services to:

1. deliver our Services;
2. facilitate payment and transactions;
3. include you in surveys;
4. enable you to post your content, such as comments, images or videos;
5. facilitate networks of online social activity centered around our products and services;
6. improve our Services and optimize user experience;
7. enable you to interact with third-party service providers, whether by linking to their sites, viewing their content within our Services, or by viewing our content within their online environment;
8. market our products and services that may be of interest to you; and
9. create aggregated, pseudonymized or anonymized information for statistical purposes.

5. Third Party Analytics and Personalization Services

We may use third-party analytics and personalization services to analyze site metrics and performance, analyze our visitors' preferences, and serve personalized content to you through the use of some or all of the technologies described above, such as cookies and clear gifs.

CONSENT

1. How Do You Get My Consent?

When you provide us with personal information to complete a transaction, verify your crypto wallet address, we imply that you consent to our collecting it and using it for that specific reason only. If we ask for your personal information for a secondary reason, such as for advertisements, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.

2. How Do I Withdraw My Consent?

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at anytime, by emailing us at info@strucwise.com.

3. Age of Consent

By using this site, you represent that you are at least the age of majority in your state or province of residence.

CHILDREN'S PRIVACY

We do not knowingly solicit, collect, maintain or use personal information from any individuals under 18 years of age, and no part of our Services is directed to minors. If you believe that your child has provided us with personal information please contact us by email at info@strucwise.com. If we become aware that we have collected personal information from a minor, we will promptly delete such information from our records and terminate the minor's account, if any.

MARKETING

On our Services, we and third parties may collect information about your activities to provide you with advertising about products and services tailored to your interests. We contract with third-party advertising companies, which may collect information about your use and interactions with the Services, over time and across third-party websites and online services, for use in delivering tailored online display and banner advertising to you on other websites and online services. To serve this advertising, these third-party companies place, use, or rely on the technologies described above, including cookies, clear gifs, device identifiers and similar technologies to obtain information about customer interactions with us through our Services and interactions with other online services. These companies use the information they collect to serve you ads that are targeted to your interests.

You may also specify your preferences through a centralized registry. To learn about how to opt out of interest-based advertising, in general, click the following: [NAI Opt Out](#) or, [DAA Opt Out](#). Your mobile device settings may allow you to prohibit mobile app platforms (such as Apple and Google) from sharing certain information obtained by automated means with app developers like us and other businesses.

INTERACTION WITH THIRD PARTY SERVICES AND BLOCKCHAIN NETWORKS

We link to third-party sites and services, or otherwise display third-party content through our Services, for your convenience and information. These third-party sites and services may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. To the extent any linked third-party sites and services are not owned or controlled by us, we are not responsible for these third parties' information practices.

As a part of our Services, we help facilitate smart contract transactions over a public blockchain network. As a result, your wallet address and associated transactions may appear in public records.

DISCLOSURE

We may share information about you with certain third parties, as described below, and as otherwise described in this Policy. We do not sell or otherwise share personal information about you, except as described in this Policy.

1. Law Enforcement and Emergency Response

We may disclose personal information about you (a) if we are required to do so by law or legal process (such as court order or subpoena); (b) in response to requests by government agencies, such as law enforcement authorities; (c) to establish, exercise, or defend our legal rights; (d) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (e) in connection with an investigation of suspected or actual illegal activity; or (f) otherwise with your consent.

2. Service Providers and Contractors

We may share personal information with third-party service providers and contractors whom we engage to provide services to us, such as fulfilling orders; processing payments; providing customer service through chat features; monitoring activity on our Services; delivering surveys and related analysis (which could be combined with Services usage analytics); maintaining databases; hosting and operating our microsites, mobile websites and mobile applications; administering, sending and monitoring emails and text messages; serving online advertisements as described above; and providing consulting services.

Certain third-party service providers, such as Anti-Money Laundry auditor, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and you have accessed a service (e.g. Know Your Customer verification) provided by a company located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

3. Sale or Merger

We reserve the right to transfer your information in the event we sell or transfer all or a portion of our business assets (including, without limitation, in the event of a merger, acquisition, joint venture, reorganization, dissolution, or liquidation).

LIMITING THE USE OF YOUR INFORMATION

We offer you certain choices in connection with the personal information we obtain about you.

1. Email

You may opt out of the Strucwise email list by following the instructions located at the bottom of each commercial email or by emailing us a request to opt out via info@strucwise.com. If you opt out of the Strucwise email lists, we may still send you operational or transactional messages, such as password-reset or account related information, from the relevant brand.

2. Mobile Push Notifications/Alerts

With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

3. Location Information

You may have the ability to turn location-based services on and off by adjusting the settings of your Internet browser or mobile device or, for some devices, by adjusting the permission settings for our mobile apps to access your location information.

4. Cookies and Clear Gifs

Visit our *Marketing* Section of this Policy to learn about how to specify your preferences over our use of cookie and similar technologies.

5. Other Marketers

If you don't want your information shared with other merchants and exchanges for those third parties' own direct marketing purposes, please email us at info@strucwise.com, enter *Nondisclosure of Personal Information Request* for the Email Subject and then complete the request.

SECURITY

To protect your personal information, we maintain administrative, technical and physical safeguards designed to protect the personal information we collect through our Services against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Our administrative safeguards include implementing, maintaining and training employees on company privacy and information security policies and procedures. Our physical and technical safeguards include maintaining physical security policies and standards to protect company systems and data, and a cybersecurity program overseen by our executive leadership team.

Our employees involved in data processing and our servers are based in Ottawa, Ontario, Canada, and other locations throughout Canada. We also work with affiliated and unaffiliated service providers in Canada, United States, and other jurisdictions around the world.

CHANGES TO THIS PRIVACY POLICY

This Policy may be updated periodically to reflect changes in our personal information practices. Changes and updates will take effect immediately upon their posting on this page. If we make material changes to this Policy, we will notify you by posting a prominent notice on our Services indicating at the top of the Policy when it was most recently updated.

QUESTIONS AND CONTACT INFORMATION

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information about our Policy, you can contact us at info@strucwise.com.

SUPPLEMENTAL PRIVACY NOTICE FOR CALIFORNIA CONSUMERS

If you are a California consumer, the information below (the "California Supplement") also applies to you, in addition to our Privacy Policy. Certain terms used in this section have the meaning given to them in California Civil Code § 1798.100 et seq. For clarity, the information below applies to personal information we collect about California consumers both on our Services and offline, such as in our physical retail stores.

Collection and Disclosure

During the 12-month period prior to the effective date of this Policy, we may have:

- a. Collected the following categories of personal information about you:
 1. Identifiers (personal) (including, for example, name, alias, postal address, unique personal identifier, online and device identifier, crypto wallet address, IP address, email address, telephone number, postal address, or other similar identifiers).
 2. Commercial Information (including, for example, marketing histories; purchasing histories or tendencies; online browsing and website interaction histories; and direct marketing histories).
 3. Computing or mobile-device information and internet or other electronic-network-activity information (including, for example, login credentials; online advertisement engagements; and cookies, tags, and similar device or user identifying information).
 4. Geolocation information.

b. Collected personal information about you from the following categories of sources:

1. You (for example, through your use of our Services).
2. Your computing or mobile devices.
3. Our technology (for example, through observed consumer interactions with us and through our Services).
4. Our Services and systems.
5. Our customers' associations (e.g., through refer-a-friend or -family programs).
6. Social media networks.

c. Collected or disclosed personal information about you for the following business or commercial purposes:

1. Facilitate accounting, auditing, and reporting.
2. Deliver analytics (machine generated through computing/mobile devices for performance, monitoring, personalization, and order processing).
3. Deliver advertising through direct or mass media (including, for example, via email, SMS, telephone, post, and broadcasts).
4. Facilitate affiliate marketing.
5. Administer claims management, handling, and insurance.
6. Respond to incidents.
7. Deliver customer service.
8. Pursue legal matters.
9. Deliver website, mobile-app, and e-commerce services.
10. Facilitate information security.
11. Facilitate fraud monitoring and prevention.
12. Deliver logistics (including, for example, order management, shipping, and fulfillment).
13. Develop customer information for personalization.
14. Process, fulfill, and ship orders.
15. Deliver social media engagement.
16. Conduct surveys.
17. Administer technology and ensure technology integrity (including, for example, by maintaining and improving networks; and identifying and fixing problems).
18. Develop, review, and test products and services.
19. Perform miscellaneous services.

d. Shared your personal information with the following categories of third-parties for a business purpose:

1. Affiliated KYC and AML services.
2. Affiliate marketer.
3. Vendor that provides services on our behalf, including:
 - Vendor (miscellaneous) services.
 - Technology administration and integrity (e.g., systems maintenance, improvement, and solutions) provider.
 - Survey administrator.
 - Solutions (miscellaneous) provider.
 - Social media provider.
 - AML and/or KYC Service Providers.
 - Payment and transaction processor.
 - Information security service provider.
 - Fraud monitoring and prevention service.
 - Data center/host/cloud-service provider.
 - Customer service provider.
 - Customer information provider.
 - Incident-response service provider.
 - Claims management (including, for example, legal or insurance) provider.
 - Advertising via direct marketing (e.g., email, SMS, telephone, post) or mass-media.

e. Shared your personal information with the following categories of third-party vendors (qualifying as a data “sale” within the meaning of the California Consumer Privacy Act):

1. Affiliate marketer.
2. Analytics insights (e.g., site performance, site monitoring, shopping personalization, and order processing) provider.
3. Advertising technology (e.g., online advertising) provider.
4. Advertising/direct marketing (e.g., email, SMS, telephone, post) or mass-media provider.
5. Product review host.
6. Testing company.
7. Survey company.
8. Social media platforms.
9. Payment Services provider.

10. Other Money Services Businesses and Financial Services provider.

f. Within the meaning of the California Consumer Privacy Act, "sold" as defined as sharing the following categories of personal information about you:

1. Identifiers (personal) (including, for example, name, alias, postal address, online and device identifier, IP address, email address, telephone number, postal address, or other similar identifiers).
2. Commercial Information (including, for example, products or services purchased, obtained or considered; marketing histories; purchasing histories or tendencies; purchase profiles; shopping and retail browsing channel preferences; online browsing and website interaction histories; and direct marketing histories).
3. Computing or mobile-device information and internet or other electronic-network-activity information (including, for example, online advertisement engagements; and cookies, tags, and similar device or user identifying information).
4. Geolocation information.
5. Inferences (including, for example, predictive information, investment profiles).
6. Personal characteristics, histories, and associations (including, for example, physical characteristics or description).
7. Household information (including, for example, family size and composition).

g. Disclosed for a business purpose the following categories of personal information about you:

1. Identifiers (personal) (including, for example, name, alias, postal address, unique personal identifier, online and device identifier, IP address, email address, account name and number, telephone number, postal address, or other similar identifiers).
2. Commercial Information (including, for example, products or services purchased, obtained or considered; marketing histories; purchasing histories or tendencies; purchase profiles; shopping and retail browsing channel preferences; online browsing and website interaction histories; and direct marketing histories).
3. Computing or mobile-device information and internet or other electronic-network-activity information (including, for example, login credentials; online advertisement engagements; and cookies, tags, and similar device or user identifying information).
4. Geolocation information.
5. Inferences (including, for example, predictive information, investment profiles).

6. Personal characteristics, histories, and associations (including, for example, signature; physical characteristics or description; and characteristics of protected classifications under California or federal law).
7. Household information (including, for example, family size and composition).

California Consumer Privacy Rights

You may have the right to request, twice in a 12-month period, the following information about the personal information we have collected about you during the past 12 months:

- a. the categories and specific pieces of personal information we have collected about you;
- b. the categories of sources from which we collected the personal information;
- c. the business or commercial purpose for which we collected or sold the personal information;
- d. the categories of third parties with whom we shared the personal information; and
- e. the categories of personal information about you that we sold or disclosed for a business purpose, and the categories of third parties to whom we sold that information or disclosed it for a business purpose.

In addition, you have the right to request that we delete the personal information we have collected from you.

To submit a request, contact us at info@strucwise.com.

To help protect your privacy and maintain security, we take steps to verify your identity before granting access to information or complying with a request. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

Under California law, we also provide you with a cost-free means to opt-out of our sharing your information with third parties with whom we do not share the same brand name, if that third party will use it for its own direct marketing purposes.

If you would like to exercise your rights under California law, please email us info@strucwise.com (entering *Nondisclosure of Personal Information Request* on the

Email Subject) to indicate your sharing preferences. If you have additional questions about our California Privacy Rights policy, you may contact us at the email.