

Our business name is *Pathway*, a subsidiary of Iterro, Inc. (hereafter, "Pathway" or "Company"). We are the owner of our website, www.Pathwayport.com (hereafter, "website").

I. General

A. Pathway takes User privacy seriously and takes reasonable efforts to protect your privacy. We have created this *Privacy Policy ("Policies")* in order to share with you our information collection and use practices.

AS IS MORE CLEARLY DEFINED HEREIN, WE WILL NEVER KNOWINGLY SELL OR ASSIGN YOUR PERSONAL INFORMATION WITHOUT YOUR KNOWLEDGE AND OR APPROVAL.

Please read these *Policies* carefully before sharing any personally identifiable information described below.

B. These *Policies* apply solely to the website located at www.Pathwayport.com. Company reserves the right to make changes or modifications to the Pathway website and these *Policies*. Display of any notice of changes online at the Pathway website shall constitute effective notice under these *Policies*, and User's continued use of the website, thereafter, shall constitute User's acceptance of such changes or modifications.

C. These *Policies* work hand-in-hand with our *Website Terms of Use and Pathway Terms and Conditions*, for which the link can be found on the Home page of our website.

D. Users can access these *Policies* by clicking on the "Privacy Policy" link that appears on the Pathway website "Homepage" and by reading it on their computer monitor, printing it out, downloading it and/or saving it at any time, even after the *Policies* have been closed.

If you do not agree to be bound by these *Policies*, you may not use the website or the Services provided on or through it.

II. Definitions

The following words used in these *Policies* shall have the following meanings:

1. "Personal Information" shall mean all data and/or information provided by and about User, including e-mail address, name, address or payment information, etc.;
2. "Website" shall mean the website on which Pathway provides its Services.
3. "User" shall mean all Users/Customers of the Pathway website and its Services.
4. "Services" shall mean all Services and/or Products provided by and through Pathway and its website.
5. "3rd-Parties" shall mean all advertisers, licensors, partners or affiliate vendors that are included on the Pathway website.

III. What Personally Identifiable Information Does Pathway Collect and How Is It Used?

A. In order to access Pathway Services, you will be asked for certain personally identifiable information such as name, email address, shipping and billing address, payment and other information.

B. Pathway will not collect personally identifiable information from Users while they use the website, unless they voluntarily provide it to us or authorize us to collect such information. For example, if you purchase a Service Plan, you will be required to provide information to complete the purchasing transaction.

C. Users may provide other information about themselves, in addition to the mandatory Personal Information ("*Voluntary Information*").

D. Pathway may use or disclose User's personally identifiable information to:

1. Operate and manage the web site;
 2. Provide services or products that have been requested;
 3. Respond to other inquiries or requests.
- E. Pathway will never sell User Information to any third party not affiliated with Pathway, without consent, except in connection with the sale or merger of Pathway or the division responsible for such Services provided.

F. Pathway may also use such information for marketing their Services to you ONLY IF you have not opted out to receive such marketing information from us.

G. When you choose to subscribe to a plan, either Emails and or Storage, on the Pathway website, User will be required to provide us with certain personal information, including your name, email address, credit card number, expiration date and billing address (this required information is subject to change from time to time). This information will be used to set account settings and preferences and to contact User in regard to any account changes, system alert messages, Pathway changes to the Terms of Use or Privacy Policy. This information may also be utilized to process User account payments and to contact User for feedback and surveys. By providing us with

this information, User consents to this information being collected, used, disclosed and stored by us in accordance with this Policy.

H. When User uploads or creates an Email distribution list or puts together an Email Campaign, with Pathway, we will have access to the data on your distribution list and the information in your Email Campaign. Pathway will never, under any circumstances, steal your lists, or share your lists with any other party, except as required by law, or regarding contacting, except in response to a complaint or other communication directly from an individual on one of your lists. Only carefully selected, authorized personnel have access to view your Distribution Lists. Pathway does review the content of the Email Campaigns of our Users to verify compliance with our Terms of Use. This benefits our Users who are in compliance with our Terms of Use, because among other things, it reduces SPAM being sent through our servers, helping to ensure high deliverability.

I. All Users will have access to reports on their Email Campaigns. These reports can determine who has opened or not opened emails, or clicked on links. This, and all other tracking information available to our Users, is also available to us, and we may collect and review that information.

J. Pathway may, from time to time, send or post surveys or requests for User feedback in order to help us make our website and Services better. Any responses we receive from Users will be used only to evaluate our website and no personally identifiable information from Users will be shared with any non-employees of Pathway.

K. Pathway may, from time to time, send notices about special offers, promotions or contests. If you sign up to participate in any of these, we will collect your email address. If you are chosen for a promotion or as a winner in a contest, you give Pathway permission to use your name, image and other information about you, for marketing purposes.

IV. What Non-Personally Identifiable Information Do We Collect and How Is It Used?

A. Pathway does collect and track certain non-personally identifiable information, including, but not limited to, IP numbers and browser type, access times, domain names, usage habits and other information which does not specifically identify any individual.

B. Pathway may use and disclose non-personally-identifiable information for any number of reasons, including but not limited to, working with business partners and improving our website and Services.

C. Pathway only uses this data in the aggregate, on a collective basis, in summary form, rather than on an individual basis. This data helps us determine the extent to which our Users use certain parts of our website, which, in turn, enables us to make it as appealing as possible. Pathway may also share aggregate data of Users collective use of our website with other companies with which we do business. We do this so they, too, can improve functionality and offer services and materials that our Users may want.

D. Pathway may also collect Personal Information through the usage of widgets. This data is solely collected in order to enable the end-user to access the Services through other companies' websites.

V. Does Pathway Offer Forums and Community Feedback Areas?

Pathway encourages communication between our Users. Although we currently do not offer a Community Feedback Area, we may set one up in the future. This will allow Users to interact and share information. This will be especially nice for Users who wish to focus in on specific topics of interest.

VI. Can I Invite Friends & Business Associates?

All Pathway Users are encouraged to invite new Users to discover Pathway. We may even have future contests for most referrals.

VII. Do I Need A Username & Password To Access Products On The Pathway Website?

All Pathway User accounts require a Username and Password to log in to the website and utilize our Services. When User is done with using the website, they should "log out" in order to prevent someone from using their computer to access their account. User must keep their Username and Password secure and not disclose it to a third party.

VIII. Does Pathway Have A Newsletter?

A. We send email notifications and information to Users who have opted in. Those notifications may be, but not limited to, our exclusive Newsletter, information on new features, new content, other products and services. These communications are sent to you directly by Pathway.

B. In order to receive the emailed information you must have subscribed, via our website, or other sources, such as our mailing/client list. It is our intention to always allow you to opt out of any of our lists. When you receive any Newsletter or email and you want to unsubscribe, you can simply follow the "unsubscribe" link at the bottom.

IX. Does Pathway Use Cookies or Web Beacons?

A. *Cookies* are small text files that a website can write to your computer. The use of *cookies* and web beacons have become an industry standard used by most major websites, including Pathway. Pathway uses *cookies* to identify you and allow you to log in once to our website and purchase or search for Products, without having to log in again.

B. *Cookies* cannot be used to run programs or deliver viruses to your computer. User has the ability to accept or decline *cookies*. Most web browsers automatically accept *cookies*, but you can usually modify your browser setting to decline *cookies* if you prefer.

C. Advertising messages displayed by third party advertisers may contain electronic images known as *web beacons* - sometimes called 'single-pixel gifs' - in order to help compile aggregated statistics and determine the effectiveness of promotional campaigns. We prohibit *web beacons* in advertisements displayed on our website from being used by third parties to collect or access your personal information.

D. Finally, Pathway may work with other companies that advertise on our website, in order to place *web beacons* on their websites, in order to allow us to develop statistics on how often clicking on an advertisement from our website results in a purchase or other action on the advertiser's website. In these ways, Pathway may compile information about what advertisements are seen and clicked by Users.

E. Our third-party partners may use *cookies* on the Pathway website or an external website. We have no access to or control over these *cookies*, hence, we will not be responsible for their use or misuse.

F. This *Policy* covers the use of *cookies* and *web beacons* by Pathway. It does not cover the use of *cookies* or *web beacons* by any other third party or advertiser.

X. Is My Information Private?

A. The Pathway website may contain links to other third-party websites and the external websites of our advertisers. Each of these websites may have a *Privacy Policy* that differs from that of Pathway. These *Policies* do not cover the privacy practices of other websites linked to us.

B. The only information that may be shared between Pathway and one of our partner websites is that which pertains to information used in the furtherance of tracking an order and providing User with correct information.

C. Notwithstanding the above policies, we reserve the right to disclose your personal information to other third parties, if we are required to do so by law or believe that such action is necessary:

1. To comply with legal process such as a search warrant, subpoena or court order;
2. To protect the Company's rights and property;
3. To investigate reports of Users sending material using a false email address or Users sending harassing, threatening, or abusive messages;
4. To protect Pathway against misuse or unauthorized use of our website and/or Pathway Products.

PLEASE CHECK OUR "TERMS OF SERVICE" FOR ADDITIONAL DISCLOSURE REQUIREMENTS AND OTHER LEGAL REQUIREMENTS.

XI. What About Data Security?

A. Among Pathway's top priorities, is to keep your Personal Information secure. We use 256-bit encryption and Secure Sockets Layer (SSL) technology, which provides the highest level of security currently available for secure transactions. This technology encrypts all of your Personal Information before it is transmitted to us. Encrypted information cannot be read or recorded as it travels over the Internet.

B. You can tell you are sending information securely by the unbroken key icon or closed lock icon that should appear at the bottom of your Internet browser's window (depending on what browser you use). These icons will appear when you are placing an order on the Pathway website. In addition, you will see our site address change slightly, from "http:" to "https:", indicating a secure server connection is being used.

C. Additionally, access to your Personal Information is provided only to our employees and agents who have a need to know such information for the purpose of fulfilling your order and offering our high level of customer service. The computers that store your Personal Information employ the latest in firewall and security technology.

D. Pathway requires that our advertisers and partners ensure the security of the data that Users provide to

them, however, in the event of a breach of their security measures, User agrees that Pathway will not be liable for any loss or damage to you.

E. Electronic Communications Privacy Act Notice (18USC 2701-2711): Pathway makes no guarantee of confidentiality or privacy of any communication or information transmitted on our website or any website linked to our website. Pathway will not be liable for the privacy of email addresses, registration and identification information, disk space, communications, confidential or trade-secret information, or any other content stored on Pathway equipment, transmitted over networks accessed by the website or otherwise connected with User's use of the website.

XII. May I See the Information You Collect About Me?

Yes! We provide Users with access to Personal Account information (e.g., account number, sales information, etc.), account status, contact information (i.e., name, address, telephone number, etc.) and other information that you may upload to your User Account Profile. User may access the information by logging into their account or by sending an email to Customer Support at Support@pathwayport.com. We will respond within 24 hours.

XIII. Can I Opt-out?

- A. Pathway gives User the option to remove personally identifiable information from our list of active Users.
- B. You may also choose to opt-out of certain communications from Pathway, such as our Newsletter.
- C. All requests for opting-out from email contact should be made by sending an email to our Customer Service Department, at Support@pathwayport.com. We will respond within 24 hours.
- D. Pathway is not responsible for removing your personally identifiable information from the lists of any third-party advertiser who has previously been provided your information in accordance with this *Policy*.

XIV. Where Is The WebSite Located?

The Pathway website is maintained in the Province of Ontario, Canada. If you are located outside of the Canada, by using our website, you authorize the export of personally identifiable information to the Canada and its storage and use as specified in these *Policies*.

XV. What Is The Minimum Age To Use The Pathway WebSite?

- A. Use of the Pathway website intended for all ages. However, in order to set up an account and purchase Services, you must be of legal age, which is eighteen (18) years, in Canada. Under no circumstances will Pathway knowingly allow a person under the age of eighteen (18) years to set up a User account, even with a parents' or legal guardian's consent, approval or authorization.
- B. If proof comes to the attention of Pathway that a registered User is under the age of eighteen (18) years, and is attempting to purchase, or has purchased Services, Pathway will immediately terminate such account

XVI. Will There Be Changes to this Privacy Policy?

- A. As explained at the beginning of these *Policies*, Pathway reserves the right to amend these *Policies* at any time, in the event that this becomes necessary after their initial release, or in the event that it becomes necessary with respect to additional or amended services provided by Pathway.
- B. Pathway will not personally notify User of any changes or amendments to these *Policies*. Users are urged to check these *Policies* frequently, in order to determine whether any changes have been made. Users understand and agree that continued use of the Pathway website assumes that they have read and accepted these *Policies*, as may be changed or amended from time to time.

XVII. Section Titles

The section titles used in these *Policies* are purely for convenience and carry with them no legal or contractual effect.

XIX. What is the Effective Date of These Policies?

This Policy was last updated on February 27, 2019

XX. Complaints

For any complaints, please contact Iterro's Data Protection Officer via privacy@pathwayport.com.

XXI. Legal basis for processing Personal Information (EEA visitors only)

If you are a visitor/customer located in the European Economic Area ("EEA"), Iterro inc. is the data controller of your personal information. Iterro's Data Protection Officer can be contacted at privacy@pathwayport.com.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.