

PRIVACY STATEMENT

PRIVACY POLICY OF ASHORED INC. (Last updated: August 2023)

ABOUT THIS POLICY AND YOUR PRIVACY

Your privacy is important to Ashored Inc. ("**Ashored**", also referred to as "**we**", "**us**", and "**our**").

This Privacy Policy explains how we collect, use, and disclose your Personal Information: (1) when you interact with us, (2) when you visit our website (<https://ashored.ca/>) (the "**Website**"), including to request a demo, ask a question, make a purchase, create an account, get support, or communicate with us (the "**Services**"), and (3) when you access or use our products, including our ATLAS software, MOBI devices, Blue Glove Certified fishing equipment, or any other applications, instruments, or products that contain a link or direction to this Privacy Policy (the "**Products**").

Please read this Privacy Policy carefully to understand how we deal with your Personal Information. By using or accessing our Products/Services, you agree to comply with this Privacy Policy. Please also refer our Terms of Service.

Ashored will obtain consent where required by law for the collection, use, and disclosure of Personal Information. By accessing or using the Products/Services or otherwise submitting your Personal Information to us, you consent to our collection, use, and disclosure of your Personal Information for the purposes and in the ways described in this Privacy Policy. If you do not agree, you may choose not to use our Products or Services.

This Privacy Policy may change from time to time to comply with applicable privacy laws, regulations, standards, and best practices in Canada or elsewhere. Your continued use of the Products or Services after we make changes means that you accept and consent to those changes, so please check the Privacy Policy regularly

for updates. If you have any questions or concerns about this Privacy Policy, please contact our Privacy Officer at privacy@ashored.ca.

WHAT IS PERSONAL INFORMATION?

"**Personal Information**" is information relating to an identified or identifiable individual. It can include, but is not limited to, an individual's name, home address, phone number, email address, age, sex, gender, health, marital or family status, identifying numbers, financial information, educational history, technical information (including device and browser type), IP address, and geo-location information.

Personal Information does not include certain business contact information used for employment, business, or professional purposes, nor does it include de-identified, anonymous, or aggregated information used for statistical or research purposes.

HOW PERSONAL INFORMATION IS COLLECTED BY ASHORED

Purposes for Collection

Personal Information is collected from you when you access or use the Products/Services. This Personal Information is collected in many ways and for different reasons, as explained in this Privacy Policy, but is generally collected for the following purposes:

- to **deliver the Products/Services** and monitor their quality and operation including for our ATLAS software, MOBI devices, and Blue Glove Certified fishing equipment;
- to **receive payments** for the Products/Services delivered to you;
- to **understand your needs** and preferences and those of our other clients;
- to **respond to your requests** about the Products/Services;

- to **conduct research** and statistical analysis on our Products/Services;
- to **administer and enhance** your and other clients' relationship with us;
- to **certify your status** as a fisher or licence holder in the fisheries industry;
- to **comply with audit, compliance, and legal requirements**, including any reporting or enforcement requirements with respect to the Department of Fisheries and Oceans Canada ("**DFO**"), the National Oceanic and Atmospheric Administration of the US Department of Commerce ("**NOAA**"), and similar governmental authorities in Canada or elsewhere;
- to **manage and develop** our business, including customizing our Products/Services for current and future clients and creating new industry partnerships;
- to **communicate** about current or future products, technology, and service offerings by us and/or by others;
- to **allow you to participate** in interactive features, geo-location functions, GPS and mapping features, or similar features on, in, or regarding our Products/Services;
- to **conduct due diligence** and carry out business transactions that may involve the purchase, sale, disclosure, or transfer of Personal Information;
- to **comply with this Privacy Policy**; and
- any other purposes for which we have consent (or do not need consent) under applicable law.

Direct Collection

Most of the Personal Information we collect from you is collected directly, when you actively provide your Personal Information to us by creating an account, making a purchase, or otherwise interacting with us. The Personal Information we collect directly from you may include:

- **individual information**, such as name, age, date of birth, marital status, sex, gender, and/or preferred pronouns;

- **contact information**, such as email address, phone number, physical address, and mailing address;
- **fishing licence and registration information**, including licence number, type of licence, and owner registration information;
- **geo-location information**, such as GPS coordinates, your exact or approximate location when using the Products/Services, and the location of your fishing equipment, instruments, and devices;
- **catch data**, such as weight of catch, quantity of catch, location, time, and date of catch, gear type used, equipment type used, vessel type used, and number of crew members;
- **financial information**, such as credit card information, banking information, billing address, and third-party payment account information;
- **account information**, such as username and passwords to access the Products/Services, your transaction history, interactions with us, profile photos, communications and marketing preferences, and any other information provided in your account;
- **social media account information**; and
- any other information you directly provide to Ashored.

This Personal Information is collected so you can create and maintain an account with us, purchase and use our Products/Services safely and with full functionality, and otherwise communicate with us about our Products/Services including ATLAS software and MOBI devices.

We also need this Personal Information: (1) to protect the security of your account, (2) to allow you to access all of our Product features, (3) to deliver technical support and for troubleshooting with our Products, and (4) to send you important information about Ashored and our Products/Services, such as safety information, updated features, material changes to our Privacy Policy, and any violations or breaches of our policies. In addition:

- We only collect **financial information** to verify and process payments for our Products/Services as well as for fraud detection and prevention, and tax and financial reporting. When you are directed to a third-party payment gateway such as PayPal, then you must refer to their privacy policy, terms of use, and any other policies they have for any complaints or any breaches of information by the third party. **WE ARE NOT RESPONSIBLE FOR ANY PRIVACY OR INFORMATION BREACHES RELATED TO A THIRD-PARTY WEBSITE LINKED OR DIRECTED THROUGH OUR WEBSITE.**
- If you opt-in and consent to receive **marketing information** from Ashored, we will process your email address and send you marketing information about our Products/Services, as well as newsletters and advertisements.
- If you choose to link any of your **social media accounts** to our Products/Services, or interact with us on social media in any way, we may use your social media information for marketing and advertising purposes or to contact you about our Products/Services.
- We may disclose your **fishing licence and registration information**, and any other Personal Information associated with it, to comply with official requests for information by DFO, NOAA, or other governmental authorities charged with enforcing the legislation, regulations, and policies governing fisheries in Canada or elsewhere.

Automatic Collection

We also collect certain information automatically when you interact with us or the Products/Services. The Personal Information we collect automatically from you may include:

- **Technical information** about the Products/Services and the devices you use to access the Products/Services, such as device type, operating system, browser type, IP address, cookies, time zone settings, time and

date, language, crash/diagnostic logs, networks, battery level, and unique identifiers such as IDFA, Android Ad ID, IDFV and MAC address;

- **Usage information**, including information about your interaction with our Website or other online platforms such as search engine(s) and keywords used to find our Website, requested pages, referring pages, pages visited on our Website, log files for our Website, date and time of Website access, scrolling habits, search terms entered, frequency of visits, and pairing of devices to your account;
- **Environmental information** associated with the use of our Products and your connected devices, including water temperature, ambient conditions, weather data, times of use, duration of use, functionality, connectivity, movement, safety of use, and location of use; and
- **Geo-location information**, such IP address location, the exact or approximate location from where you are accessing the Products/Services, your equipment location relative to other clients' Products, and GPS coordinates when using our ATLAS software, MOBI devices, and Blue Glove Certified fishing equipment, if GPS functionality is enabled.

This Personal Information is collected to maximize how our Products/Services work, to help identify and resolve technical errors, to monitor safety and operational issues, and to provide quality support. In addition, regarding **geo-location information**:

- Ashored may disclose de-identified (anonymous) geo-location data and information to third parties for research, scientific, or statistical purposes relating to fisheries, the fisheries industry, or ocean studies.
- Ashored is not required to seek your consent to disclose geo-location data and information to DFO, NOAA, or other governmental authorities charged with enforcing the legislation, regulations, and policies governing fisheries in Canada or elsewhere.

WEBSITE COOKIES AND COLLECTED INFORMATION

Cookies are files which are stored on your computer or device after you visit the Website.

We may use cookies to understand how our Website is used and to help us improve your overall online experience. Except for strictly necessary cookies (as described below), most of the cookies on our Website expire at the end of your current session, except some that may have an extended lifespan. Some cookies, however, are persistent and will never expire.

Our Website may use the following types of cookies:

- **Strictly Necessary** – These cookies are necessary for the essential functions of the Website (for example, for effective security or communication) and cannot be switched off in our systems. You can set your browser to block or alert you about these cookies, but this may impact the functionality of the Website.
- **Visitor Statistics and Performance** – These cookies collect aggregate information and statistics from our Website regarding visitors, length of visit, date of visit, bandwidth used, pages viewed, and sites visited before and after leaving our Website. Personal Information is not directly linked to this information, such as your name, address, email, or telephone number.
- **Website Preferences** – These cookies are used to provide the Services or remember settings to enhance your visit; for example, text size or other preferences that improve your online experience. The information collected by these cookies is anonymous and does not enable us to track your browsing activity on other websites. By using our Website, you agree that we can place these types of cookies on your device. If you prefer to restrict, block, or delete cookies from our Website, you can adjust your browser settings (see how to change cookie settings in [Edge](#), [Chrome](#) and [Safari](#)). If you choose to disable all cookies, we cannot guarantee that the Website will work as expected.

HOW PERSONAL INFORMATION IS DISCLOSED TO THIRD-PARTIES

We may disclose your Personal Information to Ashored employees and contractors, or to companies that are related to us, including any parent companies or subsidiaries of Ashored. However, we will only do so as described in this Privacy Policy or as permitted by applicable law.

We may also disclose Personal Information to third parties: (1) who have a contract with us, (2) who help us deliver the Products/Services to you, such as Amazon Web Services, Earth Ranger, Ropeless Manufacturing Working Group (“**RMW**”), and other service providers for our ATLAS software, MOBI devices, and Blue Glove Certified fishing equipment, or (3) who work with DFO, NOAA, or other government departments, agencies, or authorities that regulate fisheries in Canada or elsewhere (the "**Third-Parties**"). Third Parties may also provide us with services related to customer support, information technology, payment processing, sales and marketing, data analysis, research, legal compliance, and surveys.

These Third-Parties may access the Personal Information for the following purposes:

- Help **maintain the security** of our Website, network, and system;
- **Collect, store, and/or process data** on behalf of Ashored;
- Help us **better deliver the Products/Services** and improve their features;
- Provide **marketing and/or promotional** assistance;
- **Analyze** how the Products/Services are used;
- Help Ashored **create industry partnerships** to improve our Products/Services; and
- **Monitor and enforce** fisheries laws, policies, and requirements.

Contractual Measures and Third-Parties

When possible, we will use **contractual measures** to restrict how Third-Parties use your Personal Information under this Privacy Policy and applicable law. Such contractual measures will require Third-Parties in Canada or internationally to:

- keep Personal Information confidential;
- use Personal Information only for the purposes for which we disclose it to them;
- use non-Personal Information that has been de-identified where possible;
- process Personal Information with at least the same standards set out in this Privacy Policy; and
- maintain privacy and security standards that comply with this Privacy Policy and applicable privacy laws.

Our Website may also include links to third-party websites, plug-ins, services, social networks, or applications. By clicking on those links you may allow the third-party to collect, use, or disclose your Personal Information. If you follow a link to a third-party website, please note that the policies of those third-parties will govern your interactions and any Personal Information collected by them. We do not accept any responsibility or liability for the policies of third-parties. Because we do not control third-party websites, we encourage you to read the policies of every website you visit.

It is also possible that, despite our safeguards and best efforts, your Personal Information may be accessed law enforcement, governmental agencies, or national security authorities in the places where the Third-Parties are located.

We may also disclose your Personal Information in the limited circumstances described below:

- **When You Agree or Direct Us to Share:** You may authorize us to disclose your Personal Information with others, including third party providers related to the operation of our ATLAS software, MOBI devices, and Blue Glove Certified fishing equipment. For example, we may need to disclose

your Personal Information to third parties if you make a purchase on the Website or if you enable GPS tracking features on our Products.

- **For External Processing:** We may disclose Personal Information to companies related to Ashored, to Third-Parties, and to other entities who are instructed to process the Personal Information for us, using appropriate confidentiality and security measures under this Privacy Policy.
- **For Business Transactions:** If Ashored's business or assets are sold or financed (for example, at a bankruptcy, receivership, or liquidation), Personal Information may be: (1) disclosed under confidentiality restrictions for due diligence purposes; or (2) collected, used, or disclosed by Ashored's successor in accordance with this Privacy Policy.
- **For Business Transfers:** If Ashored's data or information is transferred to a new entity in a business transaction, the privacy policy of that entity will be posted on the Website and will govern the collection, use, and disclosure of your Personal Information going forward. Ashored is not required to communicate such a transfer to you in advance; however, this Privacy Policy will be updated as needed as part of the business transfer.
- **For Legal Reasons or to Prevent Harm:** We may use or disclose Personal Information: (1) to comply with a law, regulation, legal process, or governmental request; (2) to assert legal rights or defend against legal claims or proceedings; or (3) to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, threats to the security of Products/Services, public safety, or safety of an individual.

If a legal process (for example, a search warrant, court order, or subpoena) requires disclosure of your Personal Information, we will use our best efforts to notify you, except if the law prevents us from notifying you. If a legal process imposes a non-disclosure period, we will only provide notice to you after the non-disclosure period expires. We may not be able to provide you with notice in urgent or counterproductive circumstances either (for example, when there is a public safety issue or an individual emergency).

NON-PERSONAL INFORMATION

We may de-identify or anonymize your Personal Information so that it can no longer be associated with you individually. For example, we may use anonymous markers or anonymous IDs.

We reserve the right to use anonymous and de-identified data (non-Personal Information) for any legitimate purpose including research, statistical, or business purposes, without further notice to you and without your consent.

We may disclose non-Personal Information that is aggregated, redacted, or de-identified (anonymous) so that it cannot reasonably be used to identify an individual.

We may disclose non-Personal Information publicly or to Third Parties (for example, in public reports about our Products/Services, in research, statistical, or scientific studies, and to our service providers).

HOW PERSONAL INFORMATION IS RETAINED AND PROTECTED

We will retain your Personal Information as long as needed or reasonable to fulfil the purposes for which it was collected, for our legitimate business interests, for legal and regulatory compliance, and to prevent harm, as described in this Privacy Policy.

Ashored processes and stores Personal Information at a private server location hosted by AWS. The Ashored Website is hosted at IP address 23.227.38.65. We use physical, electronic, contractual, and administrative measures appropriate for the sensitivity of the Personal Information and designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. We may use Third-Parties to ensure the appropriate measures are used.

We use appropriate security measures when destroying Personal Information, including shredding paper records and permanently deleting electronic records.

The security of your Personal Information also depends on you. Where you have a password to access your account or to use our Products/Services, you must keep this password confidential. Please use a strong password and do not share your password with anyone.

Unfortunately, the Internet is not completely secure. Although we use all reasonable efforts to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via our Website or to our Products. We are not responsible for any circumvention of privacy settings, or failure to comply with security measures, on the Website or in our Products.

HOW TO ACCESS, CORRECT, OR DELETE YOUR PERSONAL INFORMATION

Ashored uses all reasonable efforts to keep your Personal Information accurate and complete. We rely on you to tell us if your Personal Information needs changes. You also have the right to correct your Personal Information. If you discover an error in the Personal Information we have about you, please contact our Privacy Officer to make a correction where reasonably possible.

Your Ashored account lets you change and delete certain Personal Information. For instance, you can edit or delete certain data you provide to us and delete your account if you wish. You may also contact our Privacy Officer for this purpose. We will not change information if we believe the change would violate any legal requirement or cause the information to be incorrect.

We may ask you to send a correction or deletion request in writing, and we will need to confirm your identity before making a requested correction or deletion.

If you choose to delete your account and stop using our Products/Services, we will use our best efforts to delete your Personal Information within **30 days**. However,

please note it may take up to **90 days** to delete all your Personal Information, due to our systems and Third Parties who store and process data for us. We may also need to retain some information for legal or governmental reasons, for safety or security concerns, or to prevent harm.

You have the right to request access to your Personal Information. However, please be aware that Ashored may not provide access to information: (1) that is confidential commercial information, (2) that was collected to investigate a breach of contract or a violation of law, (3) that is related to dispute resolution, (4) that may be withheld by law, or (5) that may be subject to lawyer-client privilege or other form of confidentiality protection. To access the Personal Information we hold about you, please contact our **Privacy Officer**.

CONSENT AND HOW TO WITHDRAW

We use and disclose Personal Information only for the purposes for which the Personal Information was collected as described in this Privacy Policy. By agreeing to this Privacy Policy, you consent to our collection, use, and disclosure of your Personal Information as described in this Privacy Policy.

If we wish to collect, use, or disclose your Personal Information in any other way or for any new purpose not described in this Privacy Policy, we will ask for your consent to do so (including by updating our Privacy Policy), unless consent is waived under the applicable law.

When you consent to the collection, use, and disclosure of your Personal Information, you also have the legal right to later withdraw or modify your consent, completely or partially. To do so, please contact our **Privacy Officer**. Please note that any withdrawal or modification of consent could prevent us from being able to provide you with certain Products or Services or to enable certain features or functions. We will do our best to explain the impact of your decision on the Products/Services when you contact our **Privacy Officer**.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We may deliver our Products/Services to clients outside of Canada and may transfer Personal Information to/from other countries for the purposes described in this Privacy Policy. By providing your Personal Information, purchasing our Products/Services, or otherwise engaging with our Products/Services, you consent to such transfer, storage, or processing.

Please note that other countries may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of Canada. In these circumstances, the governments, courts, authorities, or regulatory agencies of the foreign country may be able to access your Personal Information through the laws of that country. You agree to this risk when you use our Products/Services.

NO INFORMATION FROM CHILDREN

Our Products/Services are not intended to be used or accessed by children (minors) under 18 years of age. We do not knowingly collect, use, disclose, or solicit Personal Information from children under such age and we ask that no one under such age provide their Personal Information to us. If we learn we have accidentally collected Personal Information from a child without parental consent, we will delete that Personal Information immediately. If you believe we might have received Personal Information about a child, please contact our **Privacy Officer**.

CALIFORNIA RESIDENTS

The following supplemental information pertains to California residents only. As a California resident, you have the following rights with respect to your Personal Information:

- You have the right to request to know about Personal Information is collected, disclosed, or sold.
- You have the right to request the deletion of your Personal Information.

- You have the right to opt-out of the sale of your Personal Information at any time.
- You have the right to not be discriminated against because of your decision to exercise your privacy rights. Accordingly, unless permitted by law, we will not deny you Products or Services, charge you different prices or rates for Products or Services, provide you a different level or quality of Product or Services, or suggest you will receive a different price or rate for Products or Services or a different level or quality of Products or Services.

To exercise your rights, you may contact our **Privacy Officer**. To fulfill your request, we may require additional Personal Information for purposes of verifying your identity. If you make a request through an authorized agent, we may require additional information to verify your authorization of the agent.

EUROPEAN UNION RESIDENTS

Ashored does not intend to collect, use, or disclose Personal Information or otherwise monitor the Personal Information of clients who visit the Website, purchase our Products, or use the Services from the European Union (the "EU"). If we do end up collecting Personal Information from the EU, we will take immediate action to safely dispose and destroy that Personal Information as soon as we are notified that we are in possession of Personal Information from the EU. If you believe that we have collected, used, or disclosed Personal Information from the EU, please notify our **Privacy Officer** immediately.

HOW TO CONTACT US AND OUR PRIVACY OFFICER

If you object to the collection, use, or disclosure of your Personal Information, if you are seeking access to your Personal Information that is held by us, or if you wish to complain, make an inquiry, or ask questions about this Privacy Policy please contact our **Privacy Officer** at privacy@ashored.ca.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time as we add new Products/Services, as we improve our current offerings, and as technologies and applicable laws change. You can check the “Last Updated” icon at the top of this page to see when changes are made. Any changes take effect as soon as we post them on our Website.

We will notify you if material changes are made to the Privacy Policy, and obtain your consent where required by applicable law. We will provide notice to you by email, by posting the notice on the Website, or by posting on any of our applications or platforms that link to this Privacy Policy.