

PRIVACY POLICY

At Wireless DNA Inc., we prioritize the accuracy, confidentiality, and security of your personal information. Our Privacy Policy outlines how we collect, use, and disclose this information. We have developed distinct Privacy Policies to address the unique privacy concerns of different groups. This specific Privacy Policy applies to all individuals, excluding current or former employees, whose information is covered by WDNA's Employee Privacy Policy. If you have any questions about which Privacy Policy applies to you, please reach out to us for clarification.

PRIVACY POLICY EFFECTIVE FOR CANADA

WDNA complies with the privacy legislation in every jurisdiction where we operate. Privacy laws and individual privacy rights can differ from one jurisdiction to another. This Privacy Policy specifically pertains to activities governed by Canada's federal and provincial privacy laws.

Please be aware that this Privacy Policy has certain limitations in its scope and application. Therefore, the rights and obligations described may not apply to all individuals or in all jurisdictions. If you have any questions about how this Privacy Policy applies to you, please contact us for clarification.

WHAT IS PERSONAL INFORMATION?

This policy defines "personal information" as any details that can identify you as an individual. This includes information like your name, home address, or personal opinions. Business contact information, such as your name, title, and work email address, used solely for professional communication, is generally excluded.

We collect, use, and disclose your personal information only with your consent, for specific and reasonable purposes. We'll be transparent about how we handle your data, and you have the right to access and correct your information.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We gather and retain various forms of personal information pertaining to the individuals we engage with. This includes and is not limited to:

- Contact and identification details, like your name, address, phone number, and email address;
- Information relevant to products and services, including those we offer to you or receive from you;
- Credit and financial particulars, such as direct deposit and banking information;
- Business relationship details, encompassing agreements, preferences, advisors, decision-makers, and any feedback or information exchanged with or provided by you;
- Any other information relevant for the purpose of our business with you.

We may also gather market-related data, which could include personal information, regarding market trends and activities impacting our operations. This information might include contract terms, financial data, and other pertinent details used for market analysis and strategic planning. Additionally, we may collect data related to our media, investor, and public relations efforts, as well as our interactions with financial analysts and advisors.

Generally, WDNA collects personal information directly from you. If we need to obtain your personal information from a third party, we typically seek your permission in advance (either explicitly or implied through your actions).

Occasionally, we may engage third-party services in our business operations, and these parties may collect personal information while performing services for us or otherwise. In such cases, we take reasonable steps to ensure these third parties have confirmed their authority to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

WHY DO WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION?

WDNA gathers personal information to effectively manage, maintain, and enhance our business operations, which include:

- Establishing, maintaining, and managing our relationship with you to facilitate the provision and receipt of requested products and services. For example, we use your personal information to verify your identity and location to ensure accurate delivery of products and services.
- Evaluating the products and services provided to you to understand your preferences and improve our offerings.
- Reviewing products and services acquired from you to foster collaboration and ensure they meet our requirements.
- Addressing your requests, such as contacting you at your preferred telephone number.
- Protecting against errors, fraud, theft, and damage to our assets.
- Facilitating environmental, health, and safety initiatives, including incident planning, response, and investigation.
- Ensuring compliance with applicable laws and regulatory requirements, and fulfilling obligations mandated by regulatory authorities.
- Any other reasonable purposes for which you have provided consent.

In addition:

- Gathering market-related data, potentially including personal information, regarding market trends and activities that affect our operations. This might encompass contract terms, financial data, and other relevant details used for market analysis and strategic planning purposes.
- Collecting data related to our media, investor, and public relations initiatives, as well as interactions with financial analysts and advisors.
- Engaging third-party services in our business operations, which may involve the collection of personal information by these parties while performing services for us or otherwise. In such instances, we take reasonable measures to ensure that these third parties have confirmed their authority to disclose your personal information to us.
- Collecting information about you without your knowledge or consent, where permitted or required by applicable law or regulatory requirements.

HOW DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

Your personal information may be utilized or disclosed:

- For the purposes outlined in this Privacy Policy; or
- For any additional purposes for which we have received your consent.

In certain circumstances permitted or mandated by applicable law or regulatory requirements, we may use or disclose your personal information without seeking your knowledge or consent.

WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may share your personal information with our employees, contractors, consultants, and other relevant parties who require such information to assist us in managing our relationship with you. This includes:

- Third parties providing services to us or on our behalf.
- Third parties aiding WDNA in delivering services to you.
- Third parties whose services are utilized to conduct our business.

Additionally, personal information may be disclosed or transferred to another party in the event of a change in ownership or the granting of a security interest in all or part of WDNA. This could occur through activities such as asset or share sales, business combinations, mergers, or joint ventures. In such instances, the receiving party is obligated to adhere to appropriate agreements or obligations and to utilize or disclose your personal information in a manner consistent with the provisions of this Privacy Policy, unless otherwise consented by you.

Furthermore, your personal information may be disclosed:

- As permitted or required by applicable law or regulatory requirements.
- To comply with valid legal processes, such as search warrants, subpoenas, or court orders.
- As part of WDNA's reporting activities.
- To safeguard the rights and property of WDNA.
- During emergency situations or to protect the safety of individuals.
- When personal information is publicly available.
- When required by law, with your consent.

YOUR CONSENT IS IMPORTANT TO US

We value obtaining your consent before collecting, using, or disclosing your personal information. Depending on the sensitivity of the information, your consent may be express, implied, or deemed through an opt-out mechanism. Express consent can be provided orally, electronically, or in writing, while implied consent can be inferred from your actions or inactions. For instance, when entering into an agreement with us, your consent to the collection, use, and disclosure of your personal information for related purposes is assumed unless otherwise specified.

Typically, we seek your consent when collecting your personal information. However, in some cases, consent may be obtained after collection but before use or disclosure. If we intend to use or disclose your personal information for a purpose not previously disclosed, we will strive to inform you of such before proceeding.

Additionally, we may collect, use, or disclose your personal information without your knowledge or consent when permitted or required by applicable law or regulatory requirements.

DEEMED CONSENT (OPT-OUT)

You have the right to change or withdraw your consent at any time, provided there are no legal or contractual obligations, and with reasonable notice. To do so, please contact our Privacy Office using the

contact details provided below. Any communication regarding the withdrawal or variation of consent should be in writing and addressed to our Privacy Office.

Unless you inform us otherwise, we assume that you have consented to the collection, use, and disclosure of your personal information as outlined in this Privacy Policy.

HOW IS YOUR PERSONAL INFORMATION PROTECTED?

WDNA strives to uphold robust physical, technical, and procedural measures tailored to the sensitivity of the personal information involved. These safeguards aim to mitigate the risk of loss and unauthorized access, copying, use, alteration, or disclosure of your personal information.

Depending on how sensitive Personal Information is, we employ the proper security measures to ensure that it is always protected and kept safe. All of our employees who have access to personal information are regularly trained and sensitized on how to you're your Personal Information private and safe. We have agreements with third parties that protect the Personal Information we give to them, including our suppliers and agents working on our behalf. You can also help protect your own Personal Information by following smart security practices, such as never using the same password across multiple accounts or websites, changing passwords on a regular basis, and selecting passwords that are difficult to guess, because the security of your Personal Information in this digital age cannot be 100% guaranteed.

As a result, while this website strives to protect your personal information, we cannot warrant the security of any information you transmit to us, and you do so at your own risk. Once this website receives your transmission, we make commercially reasonable efforts to ensure its security on our systems

UPDATING YOUR PERSONAL INFORMATION

Ensuring the accuracy and currency of the information within our records is crucial. If there are any changes to your personal information throughout our relationship, please notify us promptly.

In certain cases, we may not be able to accommodate your request to modify your personal information. Instead, we may opt to add alternative text to the relevant record.

ACCESS TO YOUR PERSONAL INFORMATION

To review, verify, or correct your personal information, please contact our Privacy Office. Kindly note that all such requests must be made in writing. Typically, your information is stored at our corporate offices in Ontario, Canada (refer to address information below).

When seeking access to your personal information, we may require specific details from you to confirm your identity and entitlement to access. Additionally, we may charge a fee for this service, which will be communicated to you in advance. Should you need assistance in preparing your request, please reach out to our Privacy Office.

It's important to note that your right to access your personal information is not absolute. There are circumstances where applicable laws or regulations permit or mandate us to withhold some or all of your personal information. Moreover, your personal information may have been disposed of, erased, or anonymized in accordance with our record retention policies.

If we're unable to grant you access to your personal information, we'll strive to provide you with an explanation, subject to any legal or regulatory constraints.

COULD YOUR PERSONAL INFORMATION EVER BE TRANSFERRED, STORED, OR PROCESSED OUTSIDE OF CANADA?

Yes, this may happen. Your Personal Information may occasionally be disclosed to our suppliers and agents based outside of Canada if appropriate security measures are taken. We have stringent procedures and rules governing how your Personal Information is handled for processing outside of Canada. However, the laws of other nations might apply to your personal information.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will keep your Personal Information only for as long as it is reasonably necessary, pertinent, or required by law for the stated purposes. Even if you are no longer our customer or you have terminated your products and services with us, we could preserve some of your personal information for a while: For example, if it's necessary for security, fraud prevention, or business operations management or mandated by law. Your Personal Information is destroyed, erased, or de-identified once it is no longer reasonably necessary, relevant for the aforesaid objectives, or needed to be preserved by law.

INQUIRIES OR CONCERNS?

If you have inquiries regarding this Privacy Policy or concerns regarding the management of your personal information, please reach out to our Privacy Office via telephone, mail, or email. We will make every effort to address your queries and inform you of any actions taken to resolve your concerns. Should you remain unsatisfied with our response, you may have the option to submit a written complaint to the Privacy Commissioner in your jurisdiction.

Please submit your inquiries to:

Address: Privacy Office, Suite 1109,
4789 Yonge Street
Toronto Ontario
M2N 0G3

Email: legal@wdna.ca

We investigate all privacy complaints and take appropriate steps to resolve them, including changing our practices where required.

If we are unable to answer your concern to your satisfaction, you can contact:

Address:
Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec
K1A1H3

Office of the Privacy Commissioner of Canada website:

<https://www.priv.gc.ca/en> (English)

<https://www.priv.gc.ca/fr> (Français)

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

TTY: 819-994-6591

REVISIONS TO THIS PRIVACY POLICY

Periodically, we may update this Privacy Policy to align with changes in our legal obligations or our approach to handling your personal information. Any revisions to this Privacy Policy will be published on our website, and we recommend checking it regularly for updates. The last update to this Privacy Policy was made on June 10, 2024.

INTERPRETATION OF THIS PRIVACY POLICY

The Privacy Office will be responsible for interpreting this Privacy Policy. While examples are provided, this policy is not limited to them. Therefore, where "including" is used, it encompasses all possibilities without restriction.

This Privacy Policy does not grant individuals any rights beyond those provided by Canada's federal and provincial privacy laws, nor does it impose additional obligations on WDNA. In the event of any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, this policy will be interpreted to comply with and uphold those laws.

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