

## GENERAL PRIVACY POLICY

### 1. INTRODUCTION

This Privacy Policy provides information on the collection, use, sharing and processing of personal information by SunTracker Technologies Ltd. and its affiliates (“SunTracker”, “we” or “us”) in connection with your use of SunTracker websites, mobile applications, and social media pages that link to this Privacy Policy, your interactions with SunTracker during in-person meetings or at SunTracker events, and in the context of other offline sales and marketing activities. This Privacy Policy also explains the choices you have in relation to these processing activities.

This Privacy Policy was last updated on 10 May 2019. However, this Privacy Policy can change over time, for example to comply with legal requirements or to meet changing business needs. The most up-to-date version can be found on this website. In case there is an important change that we want to highlight to you, we will also inform you in another appropriate way (for example via a pop-up notice or statement of changes on our website).

“Personal Information” means information that relates to an identified individual or to an identifiable individual. For example, this could include among other things your name, address, email address, business contact details, or information gathered through your interactions with us via our websites or at events. For more detail about the types of Personal Information that we may process, please refer to Section 4 below.

This Privacy Policy applies to the processing of Personal Information by: SunTracker visitors and users of the various SunTracker sites; attendees of SunTracker events; customers, prospective customers, and their representatives; and suppliers, business partners, and their representatives.

SunTracker Technologies Ltd. and its affiliates are responsible for the processing of your Personal Information as described in this Privacy Policy.

SunTracker processes both offline and online Personal Information. Personal Information may in some cases directly identify you, while in other cases it may only indirectly identify you.

SunTracker obtains information from: our online and offline interactions with you during events, email or telephone correspondence, third party data providers, or interactions with our sites.

We use your Personal Information to respond to your requests; to deliver functionality on our sites; to administer our subscriptions; to market and tailor products and services to you or your company’s interests; to engage in transactions with and process orders; to develop, improve the performance of, and secure our sites, products and services; and to comply with applicable laws such as to comply with an opt-out request.

Your Personal Information may be shared throughout SunTracker’s organization and with third parties such as distributors or resellers, service providers, and public, government, judicial and law enforcement entities.

We provide multiple choices in respect of the information we process about you. You can choose to opt-out, object to, or restrict our use of your Personal Information; delete, change or correct your Personal Information; or access your Personal Information.

If you believe your Personal Information has been used in a way that is not consistent with the Privacy Policy, please contact our Privacy Officer at [privacy@suntrackertech.com](mailto:privacy@suntrackertech.com).

## 2. SCOPE

This Privacy Policy applies to the processing of Personal Information by SunTracker of:

- visitors and users of the various SunTracker sites, including:
  - our websites on [suntrackertech.com](http://suntrackertech.com) and [allthingslighting.org](http://allthingslighting.org);
  - computer or mobile software applications; and
  - our social media pages that link to this Privacy Policy(collectively referred to as the “sites”);
- attendees of SunTracker events;
- customers and prospective customers and their representatives;
- suppliers and business partners and their representatives;

When interacting with our websites, you also have the ability to link or connect with non-SunTracker websites, services, social networks, applications or other features. Enabling these features will lead to other parties than SunTracker processing Personal Information. SunTracker does not have any control over these features of other parties. We encourage you to review the privacy policies of these parties before using these features.

## 3. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION?

SunTracker and its affiliates are responsible for processing your Personal Information described in this Privacy Policy.

## 4. WHICH TYPES OF PERSONAL INFORMATION DO WE PROCESS AND FROM WHICH SOURCES?

SunTracker can process Personal Information collected both offline and online.

Offline Personal Information originates from: our interactions with you during in-person meetings; or at SunTracker events, conferences, workshops or gatherings;

Online Personal Information originates from your activities on our sites, for example, in relation with your SunTracker accounts, (pre-)sales inquiries or subscription, blog, or from your interactions with SunTracker via electronic communication tools such as email or telephone. Personal Information may also be provided by third party sources, such as data aggregators who may not have a relationship with you.

Online Personal Information may also originate from the use of cookies and similar technologies (for example, pixel tags and device identifiers) on our sites or sites of third parties. For more information on cookies and similar technologies, please see Section 11 below.

Personal Information that SunTracker may collect and process includes:

- name and physical address, mailing address, email addresses, and telephone numbers;
- demographic attributes, when tied to Personal Information that identifies you;
- photographs and testimonials;
- transactional data, including products and services ordered, financial details and payment methods;
- company data such as the name, size and location of the company you work for, and your role within the company;
- data from surveys and publicly available information, such as social media posts;
- unique IDs such as your mobile device identifier or cookie ID on your browser;
- IP address and information that may be derived from IP address, such as geographic location;
- information about a device you use, such as browser, device type, operating system, the presence or use of apps, screen resolution, software preferences, and the preferred language;
- behavioural data of the internet connected computer or device you use when interacting with the sites, such as advertisements clicked or viewed, sites and content areas, date and time of activities or the web search used to locate and navigate to a site.

Please note that SunTracker does not control the content that you may post to SunTracker social networks; in some cases, such content may be publicly available on the Internet. You should carefully consider whether you wish to submit Personal Information to these forums or social networks and whether you wish to make your profile available to other users, and you should tailor any content you may submit accordingly.

#### 5. WHY AND HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use Personal Information for the following purposes:

- (a) to communicate and respond to your requests and inquiries to SunTracker;
- (b) to deliver functionality on our sites and for their technical and functional management;
- (c) to administer subscriptions;
- (d) to market our products and services or related products and services, and to tailor our marketing and sales activities to you or your company's interests;
- (e) to engage in transactions with customers, suppliers and business partners and to process orders for SunTracker products and services;
- (f) to analyse, develop, improve and optimize the use, function and performance of our sites and products and services;
- (g) to manage the security of our sites, networks, and systems; and

(h) to comply with applicable laws and regulations and to operate our business.

These purposes are described below in further detail:

(a) To communicate and respond to your requests and inquiries to SunTracker:

- If you get in touch with us (such as by submitting contact forms on our sites, attending SunTracker events or other occasions, sending an email or by visiting social media platforms), we process Personal Information to communicate with you and to respond to your requests or other inquiries. We can also process Personal Information to interact with you on third party social networks.

(b) To deliver functionality on our sites and for their technical and functional management:

- When you choose to register with us, we need to process the Personal Information provided by you so that we can create and manage a personal account for you. Upon creating your account, we will send you your personal login information. This Personal Information enables us to administer your account, for example by changing your password for you.

(c) To administer subscriptions:

- If you subscribe to our services, we process Personal Information to administer your subscription (including the renewal process).

(d) To market our products and services or related products and services and to tailor marketing and sales activities:

- SunTracker may use Personal Information to notify you about new product releases and service developments, events, alerts, updates, prices, terms, special offers and associated campaigns and promotions (including via newsletters). SunTracker may also use Personal Information to advertise SunTracker's products and services or related products and services, and also to have our distributors, resellers or partners notify you about our products or services or their related products or services (such as via joint sales or product promotions). We do our best to tailor your website visit, marketing experience and our communications to your expressed interests.
- If you attend an event, SunTracker may process Personal Information gathered in relation to the event and can share Information about your attendance with your company. SunTracker may also permit designated event partners or conference sponsors to send you up to two communications related to your event attendance. Please note that our partners or conference sponsors may directly request Personal Information at their conference booths or presentations, and their use of your information that you provide to them will be subject to their privacy policies.
- We may also process your Personal Information to post testimonials on our sites, but will first obtain your consent to use your name and testimonial.

(e) To engage in transactions with customers, suppliers and business partners and to process purchases of our products and services:

- If you place an order for our products and services, or if you provide services to SunTracker, our employees, customers or partners as a supplier or business partner, SunTracker processes Personal Information to engage in and administer the relevant transactions (such as by sending invoices and making payments), administer your order, and help you get started and adopt our products and services. If you download products or services from our sites, SunTracker uses Personal Information to confirm certain Information about your order (for example, that you did not experience problems in the download process).

(f) To analyse, develop, improve and optimize the use, function and performance of our sites and products and services:

- We may process Personal Information in order to analyse, develop, improve and optimize the use, function and performance of our sites and products and services, as well as marketing and sales campaigns. In case the sites permit you to participate in interactive discussions, create a profile, post comments, opportunities or other content, or communicate directly with another user or otherwise engage in networking activities, SunTracker may process Personal Information when moderating these activities.

(g) To manage the security of our sites, networks and systems:

- We may collect site use data for security and operations management to help keep our sites, networks and systems secure, or to investigate and prevent potential fraud including ad fraud and cyber-attacks and to detect bots.

(h) To comply with applicable laws and regulations and to operate our business:

- In some cases, we have to process Personal Information to comply with applicable laws and regulations. For example, to respond to a request from a regulator or to defend a legal claim. We may also process Personal Information in the performance and operation of our business, such as to conduct internal audits and investigations or for finance and accounting and archiving and insurance purposes.

## 6. WHAT IS OUR BASIS FOR PROCESSING PERSONAL INFORMATION?

For Personal Information collected about you, our basis for processing is the following:

- In order to communicate adequately with you and to respond to your requests, we need to process Personal Information and therefore have a legitimate interest in processing this information.
- In order to engage in transactions with customers, suppliers and business partners, and to process purchases and downloads of our products and services, we need to process Personal Information as necessary to enter into or perform a contract with you.

- We process Personal Information for marketing and sales activities based on your consent where so indicated on our sites at the time your Personal Information was collected, or further to our legitimate interest to market and promote our products and services.
- We rely on our legitimate interest to analyse, develop, improve and optimize our sites, products and services, and to maintain the security of our sites, networks and systems.
- In order to comply with applicable laws and regulations, such as to comply with a subpoena or other legal process, or to process an opt-out request.

## 7. FOR WHAT PERIOD DO WE RETAIN PERSONAL INFORMATION

SunTracker maintains Personal Information for the following retention periods:

- Personal Information we collect to engage in transactions with our customers, suppliers and business partners, and to process purchases of our products and services, will be retained for the duration of the transaction or services period, or longer as necessary for record retention and legal compliance purposes.
- If you have registered for a SunTracker account, your account information will be retained for as long as you maintain an active account. Your account and account information will be deleted if you do not log in for 12 consecutive months. SunTracker retains records of that deletion for 30 days.
- If you have registered for our newsletters and blogs your data will be retained for as long as you are subscribed to our distribution lists. SunTracker retains records of that deletion for 30 days.
- Contact information such as your email address or phone number collected online on our sites or offline from our interactions with you at SunTracker events and conferences, and used for direct marketing and sales activities will be retained for as long as we have an active (customer) relationship with you. We treat you as an active contact if (i) you have interacted with SunTracker or updated your contact details and preferences in the past 18 months; and (ii) you have not made a deletion request.
- Personal Information needed to retain your opt-out preferences is retained for 7 years (or longer as necessary to comply with applicable law).

## 8. WHEN AND HOW CAN WE SHARE YOUR PERSONAL INFORMATION?

Sharing within SunTracker

(a) Personal Information may be shared throughout SunTracker's organisation.

- SunTracker employees are authorised to access Personal Information only to the extent necessary to serve the applicable purpose(s) and to perform their job functions.

(b) Sharing with third parties

- We may share Personal Information with the following third parties:

- Third-party service providers (for example, credit card processing services, order fulfilment, analytics, event/campaign management, website management, information technology and related infrastructure provision, customer service, e-mail delivery, auditing, and other similar service providers) in order for those service providers to perform business functions on behalf of SunTracker;
  - SunTracker distributors or resellers for further follow-up related to your interests, specific partners that offer complementary products and services or with third parties to facilitate interest-based advertising;
  - Relevant third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings);
  - As required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes.
- When third parties are given access to Personal Information, we will take appropriate contractual, technical and organisational measures designed to ensure that Personal Information is processed only to the extent that such processing is necessary, consistent with this Privacy Policy, and in accordance with applicable law.

## 9. HOW IS PERSONAL INFORMATION HANDLED GLOBALLY?

SunTracker licenses its software globally, with Personal Information processed in Canada from global sources. Personal Information transferred to SunTracker is subject to the *Personal Information Protection and Electronic Documents Act* S.C. 2000, c. 5 (“PIPEDA”) and the *Personal Information Protection Act* SBC 2003 Ch. 63 (“PIPA”). Where PIPEDA and PIPA do not provide an adequate level of protection for Personal Information, SunTracker will take reasonable measures to adequately protect Personal Information.

## 10. HOW IS YOUR PERSONAL INFORMATION SECURED?

SunTracker has implemented appropriate technical, physical and organisational measures designed to protect Personal Information against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, as well as all other forms of unlawful processing.

## 11. WHAT COOKIES AND SIMILAR TECHNOLOGIES DO WE USE ON OUR SITES?

Cookies and similar technologies (e.g., pixels tags, tokens, and device identifiers) are used by SunTracker and our advertising technology partners to recognize you and/or your device(s) on, off and across different services and devices for the purposes specified in Section 5 above.

### (a) When do we use cookies and similar technologies?

Cookies are small text files that contain a string of characters and uniquely identify a browser on a device connected to the Internet. Any browser visiting our sites will receive cookies from us.

We also place cookies in your browser when you visit non-SunTracker sites that host our plugins or tags. We use cookies and other technologies on all our sites to ensure the best possible and secure experience on our sites and to provide you with tailored information on products and services. SunTracker also uses cookies or similar technologies on its sites to collect online information such as your mobile device ID, IP address, and other information about your device, as well as behavioural data of your device usage on our sites (e.g. pages viewed, links clicked, documents downloaded). This information contributes to SunTracker's marketing data services, and to enforcement of licenses.

(b) How can I manage my cookie preferences?

If you do not want to receive cookies, you can also change your browser settings on your computer or other device you are using to access our services. Most browsers also provide functionality that lets you review and erase cookies, including SunTracker cookies. However, to opt out of cookies may reduce or prohibit some site functionality.

## 12. WHAT ARE YOUR CHOICES?

We provide multiple choices in respect of the information we process about you:

(a) Opt-out of our use of your Personal Information

You may withdraw consent you have previously provided for the processing of Personal Information, including for email marketing by SunTracker.

(b) Delete Personal Information

You can ask us to erase or delete all or some of the Personal Information.

(c) Change or correct Personal Information

You can ask us to change, update or fix Personal Information in certain cases, particularly if it is inaccurate.

(d) Object to, or limit or restrict use of Personal Information

You can ask us to stop using all or some of the Personal Information (for example, if we have no legal right to keep using it) or to limit our use of it (for example, if the Personal Information is inaccurate).

(e) Right to access and/or have your information provided to you

You can also ask us for a copy of Personal Information and can ask for a copy of Personal Information provided in machine readable form if you reside in the EU or other country that provides you this right as a matter of law.

You can exercise these choices in accordance with applicable laws.

## 13. DO YOU COLLECT SENSITIVE INFORMATION AND INFORMATION FROM CHILDREN?

(a) Sensitive Personal Information



We ask that you do not send us, and do not share any sensitive Personal Information (for example, government-issued IDs, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

(b) Children's privacy

As a company focused on serving the needs of businesses, SunTracker's sites are not directed to minors and SunTracker does not promote or market its services to minors, except in very limited circumstances as part of specific educational outreach programs with parental permission. If you believe that we have mistakenly or unintentionally collected Personal Information of a minor through our sites without appropriate consent, please notify us so that we may immediately delete the information from our servers and make any other necessary corrections. Additionally, please contact us to request removal of content or information that was posted to our sites when the registered user was under the age of 16. Please note that such requests may not ensure complete or comprehensive removal of the content or information, as, for example, some of the content may have been reposted by another user.

#### 14. PRIVACY OFFICER

SunTracker has appointed a Privacy Officer. If you believe your Personal Information has been used in a way that is not consistent with the Privacy Policy or your choices, or if you have further questions, comments or suggestions related to this Privacy Policy, please contact the Privacy Officer.

Written inquiries to the Privacy Officer may be addressed to:

SunTracker Technologies Ltd.  
Privacy Officer  
#303 – 31 Bastion Square  
Victoria, BC V8W 1J1  
Canada  
Email: [privacy@suntrackertech.com](mailto:privacy@suntrackertech.com)

#### 15. DISPUTE RESOLUTION OR FILING A COMPLAINT

If you have any complaints regarding our compliance with this Privacy Policy, please contact us first. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with this Privacy Policy and in accordance with applicable law.

If you have an unresolved privacy or data use concern that you believe we have not addressed satisfactorily, you have the right to file a complaint with a competent data protection authority.

#### 16. SUNTRACKER CORPORATE HEADQUARTERS

SunTracker's corporate headquarters are located at:

#303 – 31 Bastion Square  
Victoria, BC, V8W 1J1  
Canada  
Tel: +1.778.433.7868