

Privacy Policy

Effective date: June 13, 2024

At Path Immigration, Inc., a Delaware company (together with its affiliates, “**Path**”), we take your privacy seriously. Please read this Privacy Policy to learn how we treat User Data and Client Data collected in connection with the performance of the Services. **By using or accessing our products or services (collectively, “Services”) in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services.

“Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage. Personal Data can include both User Data and Client Data.

For purposes of this Privacy Policy, the capitalized terms “**You**”, “**User**”, “**User Data**”, “**Client**” and “**Client Data**” have the respective meanings attributed thereto in Path’s terms of service relating to the provision of the Services set forth here: <https://app.pathimmigration.ca/terms>, as such terms of service may be amended from time to time (the “**Terms of Service**”).

Personal Data

Categories of Personal Data We Collect

For purposes of the *California Consumer Privacy Act* (“**CCPA**”) and otherwise, this chart details certain categories of Personal Data that we may collect but may not be an exhaustive list, in each case in respect of any legal services provider using the Services or any primary applicant or other Authorized User (as defined in Path’s terms of service, as amended from time to time) using the Services and such Authorized User’s respective spouses and other family members:

| <u>Category of Personal Data</u> | <u>Examples of Personal Data We Collect</u> | <u>Categories of Third Parties With Whom We Share this Personal Data:</u> | <u>How We Use this Personal Data</u> |
|----------------------------------|---|---|---|
| <u>User Data</u> | | | |
| Profile or Contact Data | <ul style="list-style-type: none">● First and last name● Email● Phone number and address● Business name and industry | <ul style="list-style-type: none">● Service Providers● Advertising Partners● Analytics Partners● Business Partners● Parties You Authorize, Access or Authenticate | <ul style="list-style-type: none">● Customer support● To transmit information between users collaborating on an immigration matter● Fraud prevention and security● Improving and developing our services● Advertising |
| Payment Data | <ul style="list-style-type: none">● Billing address, phone number, and email | <ul style="list-style-type: none">● Our payment processing partner(s) | <ul style="list-style-type: none">● Payment collection● Customer support● Fraud prevention and security● Advertising |

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|--|---|---|--|
| Commercial Data | <ul style="list-style-type: none"> ● Purchase history ● Consumer profiles | <ul style="list-style-type: none"> ● Service Providers ● Business Partners ● Parties You Authorize, Access or Authenticate | <ul style="list-style-type: none"> ● Customer support ● Improving and developing our services ● Advertising |
| Online Identifiers | <ul style="list-style-type: none"> ● Unique identifiers such as account name and passwords | <ul style="list-style-type: none"> ● Service Providers ● Analytics Partners ● Business Partners ● Parties You Authorize, Access or Authenticate | <ul style="list-style-type: none"> ● Customer support ● Fraud prevention and security ● Improving and developing our services |
| Device/IP Data | <ul style="list-style-type: none"> ● IP address ● Device ID ● Domain server ● Type of device/operating system/browser used to access the Services | <ul style="list-style-type: none"> ● Service Providers ● Advertising Partners ● Analytics Partners | <ul style="list-style-type: none"> ● Customer support ● Fraud prevention and security ● Improving and developing our services ● Advertising |
| Web Analytics | <ul style="list-style-type: none"> ● Browsing or search history ● Web page interactions ● Referring webpage/source through which you accessed the Services ● Statistics associated with the interaction between device or browser and the Services | <ul style="list-style-type: none"> ● Service Providers ● Advertising Partners ● Analytics Partners | <ul style="list-style-type: none"> ● Customer support ● Improving and developing our services ● Advertising |
| <u>Client Data</u> | | | |
| Client Identifiers | <ul style="list-style-type: none"> ● Driver's license number ● Passport number ● Digital Passport Photo for all family members coming to Canada ● Bio data page of passport (colour scan) ● Family member (dependent) ID documents (if applicable) – marriage certificate, ID cards, passports, birth certificates of children | <ul style="list-style-type: none"> ● Service Providers ● Parties You Authorize, Access or Authenticate ● Business Partners | <ul style="list-style-type: none"> ● To deliver a full range of immigration services to clients (data collection, file management, outcome resolution, etc.) ● Customer support ● Improving and developing our services |
| Demographic Data | <ul style="list-style-type: none"> ● Age / date of birth ● Zip code ● Gender ● Race ● Ethnicity ● Marital status | <ul style="list-style-type: none"> ● Service Providers ● Business Partners ● Analytics Partners | <ul style="list-style-type: none"> ● To help immigration practitioners prepare their clients' matters ● Customer support ● Improving and developing our services |
| Professional or Employment-Related Data | <ul style="list-style-type: none"> ● Job descriptions for current role and proposed role in Canada (or current job description if the same) ● Up to date CV/resume | <ul style="list-style-type: none"> ● Service Providers ● Business Partners ● Analytics Partners ● Parties You Authorize, Access or Authenticate | <ul style="list-style-type: none"> ● To help immigration practitioners prepare their clients' matters ● Customer support |

| | | | |
|---|--|---|---|
| | <ul style="list-style-type: none"> • Copy of post-secondary educational credentials | | <ul style="list-style-type: none"> • Improving and developing our services |
| Other Identifying Information that You or Client Voluntarily Choose to Provide | <ul style="list-style-type: none"> • Identifying information in emails or letters you send us • Summary health information | <ul style="list-style-type: none"> • Service Providers • Business Partners • Analytics Partners • Parties You Authorize, Access or Authenticate | <ul style="list-style-type: none"> • To help immigration practitioners prepare their clients' matters • Customer support • Improving and developing our services |

Categories of Sources of Personal Data

We collect Personal Data from or about you from the following categories of sources:

- **User Data and Client Data**
 - o When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services, including uploading or providing User Data or Client Data in connection with your use of the Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - When you authorize third-party integrations.
 - o When you use the Services and such information is collected automatically.
 - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
 - If you use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
 - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- **Public Records**
 - o From the government or other sources.
- **Third Parties**
 - o Vendors and Brokers
 - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
 - o Advertising Partners
 - We receive information about Users from some of our vendors who assist us with marketing or promotional services related to how Users interact with our websites, applications, products, Services, advertisements or communications. We do not share any such data or other information relating to Clients or Client Data.
 - o Social Networks
 - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.
 - o Third-Party Data Integrations (e.g., Yelp or Google Maps)

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**

- o Creating and managing your account or other user profiles.
- o Processing orders or other transactions; billing.
- o Providing you with the products, services or information you request.
- o Meeting or fulfilling the reason you provided the information to us.
- o Providing support and assistance for the Services.
- o Improving the Services, including testing, research, internal analytics and product development.
- o Personalizing the Services, website content and communications based on your preferences.
- o Doing fraud protection, security and debugging.
- o Carrying out other business purposes stated when collecting Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act.
- **Marketing the Services**
 - o Marketing and selling the Services.
 - o Showing you advertisements, including interest-based or online behavioral advertising.
 - o For the avoidance of doubt, we do not share any such data or other information relating to Clients or Client Data relating to marketing and selling the Services.
- **Corresponding with You**
 - o Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Path or the Services.
 - o Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - o Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - o Protecting the rights, property or safety of you, Path or another party.
 - o Enforcing any agreements with you.
 - o Responding to claims that any posting or other content violates third-party rights.
 - o Resolving disputes.

We will not use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Share Personal Data

We disclose Personal Data to the categories of service providers and other parties listed in this section. Depending on laws that may be applicable to you, some of these disclosures may constitute a “sale” of Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. To the extent such Service Providers are located outside Canada, the jurisdictions in which User Data or Client Data is stored shall be subject to privacy legislation that provides a comparable level of protection to the protection provided by applicable Canadian privacy legislation. Without limiting the foregoing, data will be collected, used and disclosed in the United States. Service Providers include:
 - o Hosting, technology and communication providers.
 - o Security and fraud prevention consultants.
 - o Support and customer service vendors.
 - o Product fulfillment and delivery providers.
 - o Payment processors.
 - Our payment processing partner(s) may collect your voluntarily-provided payment card information necessary to process your payment.
 - Please see our payment processors’ terms of service and privacy policies for information on their respective use and storage of Personal Data.
- **Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
 - o Ad networks.
 - o Data brokers.

- o Marketing providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
 - o Companies that track how users found or were referred to the Services.
 - o Companies that track how users interact with the Services.
- **Business Partners.** These parties partner with us in offering various services. They include:
 - o Businesses that you have a relationship with.
 - o Companies that we partner with to offer joint promotional offers or opportunities.
- **Parties You Authorize, Access or Authenticate**
 - o Third parties you access through the services.
 - o Social media services.
 - o Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Client Data – Consent Requirements

You are solely responsible for obtaining all express consent(s) from Clients relating to the collection, storage and processing of Client Data in connection with Your use and access of the Services required by applicable law. Such express consent(s) shall include each Client’s express consent for Client Data to be disclosed, stored and processed outside Canada by Path and its third party Service Providers. You shall inform us promptly of any withdrawal of such consent duly provided by a Client in accordance with applicable law.

Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We may use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.

- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising. For example, if applicable, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.
- **Retargeting/Advertising Cookies.** Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled "Information about Interest-Based Advertisements."

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors ("Interest-Based Ads"). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

Data Security and Retention

We seek to protect Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data in accordance with the terms and conditions of the Terms of Service. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or

collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

We acknowledge and will comply with our obligations under applicable privacy legislation in respect of the collection of Personal Data about your children and dependents. We may collect, solicit and store Personal Data about your children and other dependents in connection with the provision of the Services. If any such children or dependents are minors for purposes of applicable privacy legislation, you represent that you are the legal parent or guardian of such persons and hereby expressly consent to our collection, solicitation and storage of such Personal Data for the sole and limited purpose of our providing the Services; provided however that it is acknowledged that minors have rights under applicable privacy legislation to object to their parents' authorizations to the extent they are capable of doing so. If any such children or other dependents are not minors for purposes of applicable privacy legislation, you represent that you have obtained such persons' express consent to our collection, solicitation and storage of such Personal Data for the sole and limited purpose of our providing the Services.

State Law Privacy Rights

California Resident Rights

The CCPA allows you to make certain requests about your personal information. Specifically, the CCPA allows you to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information.
- Provide access to and/or a copy of certain personal information we hold about you.
- Delete certain personal information we have about you.
- Provide you with information about the financial incentives that we offer to you, if any.

The CCPA further provides you with the right not to be discriminated against (as provided for in applicable law) for exercising your rights. Please note that certain information may be exempt from such requests under California law. For example, we need certain information to provide the Services to you. We also will take reasonable steps to verify your identity before responding to a request. If we are unable to verify you, we shall have the right, but not the obligation, to request additional information from you.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, or if you are an authorized agent making a request on a California consumer's behalf, please contact us using the contact information provided below. If you are a Customer End User, please contact the Customer who has provided your information to us for more information.

The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

Please note that the CCPA sets forth certain obligations for businesses that "sell" personal information to third parties. We do not engage in such activity as defined in the CCPA and have not engaged in such activity in the past twelve months from the Effective Date of this Policy.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at awais@o1pathways.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. We do not sell Personal Data to third parties.

Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Path website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- Phone: 1 (516) 912 6487
- Website: <https://o1pathways.com>
- Email: awais@o1pathways.com
- Address: 8 The Green, Suite R, Dover, DE 19901