

TITAN-T CA INC PRIVACY POLICY

2022



OUR COMMITMENT TO PROTECT YOUR PRIVACY

Your privacy is important to us. This privacy policy explains the personal data TITAN-T CA INC processes, how TITAN-T CA INC processes it, and for what purposes. It is in line with EU, and Canada privacy laws such as General Data Protection Regulation, and the Personal Information Protection and Electronic Documents Act (PIPEDA). This policy should be read together with the Terms of Use for Criuspay products and services. Where there is a conflict, this policy will prevail. This policy applies to all customers and visitors of www.criuspay.com.

This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Canadian and other applicable laws.

By accessing or using any of our Services, you accept and signify your consent to the practices described in this Privacy Policy. If you do not agree with the policies and practices contained in this Privacy Policy, your choice is not to use this Site or the Services in connection with this Site.

PERSONAL INFORMATION WE COLLECT

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

We collect Device Information using the following technologies:

– “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

– “Log files” track actions occurring on the Site, and collect data including your IP address, and date/time stamps.





Additionally, when you open an account we collect certain information from you including your name, residential address, date of birth, profession, as it is required by the governing law of our operation. We refer to this information as “Account opening Information.”

When making a transaction through the Site, we may collect certain information from you, including beneficiary name, address, purpose (including credit card numbers), email address, and phone number. We refer to this information as “Transfer Information.”

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Account Opening Information and Transfer Information and referring to it as “Client information”.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use the Client Information that we collect generally to open the account for the client and remit the funds of the client’s order placed through the Site (including processing your transfer information and providing you with transfer confirmations). Additionally, we use this Order Information to:

- Communicate with you;
- To provide you with requested services;
- To manage your account with Criuspay;
- To respond to questions, comments or concerns regarding Criuspay;
- Screen our transactions for potential risk or fraud; and
- When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns). We may also use your device information in order to provide you with targeted advertisements or marketing communications we believe may be of interest to you.





INFORMATION ABOUT YOUR USE OF THE CRIUSPAY SERVICES

Usage and Automatically Collected Information

When you access or use our Services, we automatically collect information about you, including:

- **Financial Information:** We collect financial information related to your use of the Services
- **Log Information:** We collect log information about your use of the Services, including the access times, pages viewed, your IP address.
- **Device Information:** We collect information about the computer or mobile device you use
- **Activities on the Site:** We collect records of activities on the Site, including, your account details, the time, value and currency of any deposit, or transaction made and the payment method.
- **Location Information:** In accordance with your device permissions, we may collect information about the geo-location of your device.
- **Information Collected by Cookies and Other Tracking Technologies:** We use different technologies to collect information including cookies. You can find out more about Criuspay use of cookies and similar technologies in our Cookie Policy.

SHARING YOUR PERSONAL INFORMATION

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we may be asked from banks to share your information related to a transaction connected to you.

We also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

Finally, we use all your transaction information for reporting it to the relevant authorities per the requirement of our license.

SHARING INFORMATION OUTSIDE CANADA

TITAN-T CA INC
1701 Hollis Street, Suite 800,
Halifax, Nova Scotia,
Canada B4A 4C5
www.criuspay.com





We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Canada.

We may also disclose personal information to third party suppliers and service providers located overseas for the purpose of providing the service you have requested.

THIRD-PARTY BILLING

We may work with agents, service providers, affiliates, or other third-party providers that store and receive data, reports, and other user information sent by your browser or mobile device, including the pages you visit, your use of our Site, your use of third-party applications, and other information that we may use to analyse and improve the Site or the Services. These third parties may use both temporary and permanent cookies. We do not have control over how third parties use your information. We will not be liable for any loss resulting from the use of personal information by third parties. Please check their websites for information about how the third parties use your information.

Our Site or Services may contain links to third-party websites. We are not responsible for the way third-party websites collect or use your personal identification information or user information. We encourage you to review the privacy policies of third-party websites that you visit or use, including those you interact with through our Site or Services.

YOUR RIGHTS

If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to fulfill contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe, including to Canada.





In addition, if you reside in the European Economic Area or Switzerland, you also have the following rights:

You have the right to complain to the data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, and certain non-European countries (including the US and Canada) are available here https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

DATA RETENTION

When you place an order through the Site, we will maintain your Order Information for our records unless and until you ask us to delete this information.

MINORS

The Site is not intended for individuals under the age of 18.

CHANGES

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. By continuing to engage us or use our website you will be deemed to have accepted the updated Privacy Policy.

CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at support@criuspay.com or by mail using the details provided below:

TITAN-T CA INC

1701 Hollis Street, Suite 800,

Halifax, Nova Scotia,

Canada B4A 4C5

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