

PRIVACY POLICY

The BusPal Privacy Policy was last updated on September 26, 2021.

Welcome to BusPal!

At BusPal your privacy is important to us. We've created this policy to cover:

1. the information we collect, use and share about you when you use the BusPal App and our website available at buspal.net (the "Services") and why we collect it;
2. how we use and share that information; and
3. some of the features that we've built into the BusPal App to protect your privacy.

INFORMATION WE COLLECT

◆ **Information users give us.** We collect some content and other information you provide when you use our Services. For example, when you sign up for an account or message or communicate with others, including our support team, you may give us your name, email address, phone number, address, birth date, contact preferences, photos and gender. In limited circumstances, we may ask you for government issued ID to validate your identity when you are requesting support or to confirm that you're eligible to use BusPal or as required by law. Users can also report violations of our Terms of Service to our support team and they may include the content you created in those reports.

◆ **Information we get from your use of our Services.** We collect information to provide you with the Services, to improve your experience using the Services and develop new services. To do this, we collect information about how you use BusPal and our other online products and services. In some cases this information will be associated with your BusPal account. For example:

- **GPS location.** We collect your GPS location if you have setup tracking of yourself as a school bus driver or rider. Tracking will only occur during the days of the week and time ranges that you specify. For each individual bus you setup, you can disable tracking at any time.
- **Device information.** We collect device-specific information such as your hardware model, operating system version, unique device identifiers or advertising IDs, and mobile network information including phone number if applicable.
- **Log information.** When you use our Services, we automatically collect and store certain information in our server logs including details of how you used our Services, such as the details of your location, date and time a message or comment was sent, the receivers of communication, and your internet protocol address, as well as third party websites or services you used (your use of GIFs or emojis).
- **Local storage.** We may collect and store information locally on your device using mechanisms such as browser web storage (including HTML 5) and

application data caches.

- **Cookies and similar technologies.** We or our service providers (such as analytics providers) may collect, store or recognize some information on your computer or mobile phone from technologies such as cookies and web beacons.

◆ **Information shared by others.** We may use third-party analytics companies (such as Google Analytics and Nielsen). The information collected by these third-parties may be used for purposes disclosed in their privacy policies, and by us to develop and deliver advertising and promotional content on BusPal, our website and on BusPal optimized websites. We may also combine the information described above with other information we collect about you.

HOW WE USE INFORMATION

◆ **Provide, improve and develop our Services.** We use information we have to deliver and enhance our Services, personalize content, and make suggestions to you. For example, we use some registration information to: (a) set up a profile page for you; and (b) allow for personalization, we use your GPS location as the position of the bus you specify and share it only with users you allow access to.

◆ **Communicate with you.** The information we collect lets us keep you posted on BusPal's latest product announcements, software updates, upcoming events and any notifications you have waiting on BusPal if you haven't been active for a while. If you don't want to be on our mailing list, you can opt out anytime by updating your preferences.

◆ **Show and measure ads and Services.** We use information to improve our advertising and measurement systems so that we can show you relevant ads on our Services and measure the effectiveness and reach of the ads and services.

◆ **Promote Safety and Security.** We may use your information, including date of birth, to verify identity, to determine eligibility to use the Services, and to recommend appropriate Services. We also use information for loss prevention and anti-fraud purposes and to enforce our Terms of Service.

INFORMATION WE SHARE

We may share your information if you ask us to. For example, if you post content on social networking sites using the BusPal App, we will provide your content as you've requested. The information you choose to share on social networking sites is not covered by this privacy policy, and you agree that you are solely responsible for your use of those sites.

We do not share, sell or transfer your personal information without your consent, except as described below:

- ◆ **Third Party products and services on BusPal.** Gifs, emojis, smileys and web pages optimized for BusPal may be operated by third-party advertisers. When you deal with these third-parties through BusPal, they and other users of these web pages may be able to see your user profile and the content of messages you are sharing, and sometimes, your approximate location. They may use this information as described in their privacy policies, which can include advertising. Also, we may share limited information with advertisers who are interested in presenting you with a tailored offer on BusPal. For example, we may provide the approximate location associated with your IP address (i.e. country and state/province), your age or age range and your gender so that you'll receive more relevant offers. We do not share your email address with advertisers without your consent.
- ◆ **Our service providers.** We use third-party service providers to help operate our business. Examples include suppliers that host our data or provide customer service. Use of your personal information by our service providers is limited to the information they need to provide services on our behalf. For more information about how these service providers treat your personal information, contact us at the address below.
- ◆ **Our related companies.** We may share some or all of your information with our related companies, including our affiliates, subsidiaries, or joint ventures who are also required to honor this privacy policy.
- ◆ **To protect BusPal and its users, or for legal purposes.** We may disclose your information: (a) if we think it's needed to detect, prevent or address illegal activity on our Services, or identify, contact or bring legal action against someone who appears to be causing injury to or interfering with our rights or property or other users; (b) as part of a BusPal legal matter or investigation, including an investigation related to a suspected breach of our Terms of Service; (c) when we believe that disclosure is required or permitted by law, including when responding to subpoenas, warrants, production orders, or similar instruments; or (d) if we believe that disclosure is needed to protect your safety or the safety of others, including when there is an emergency involving potential harm, loss of security or serious injury to people or threats of such emergencies.
- ◆ **Merger, financing or sale.** We may share or sell your information in connection with a merger, financing, acquisition, dissolution transaction, bankruptcy or proceeding involving sale, transfer, divestiture of all or a portion of our business or assets. If another company acquires our business or assets, that company will have your information collected by us and will assume the rights and obligations regarding your information as allowed by this privacy policy.

We may share your non-personal, aggregated information with third party advertisers.

SAFETY & SECURITY FEATURES IN BusPal App

We believe that BusPal should be a safe place for everyone to track and monitor school buses. We have built safety features into BusPal including:

- Giving you the ability to allow or block users from monitoring your school bus.
- Giving you the ability to set the exact days of the week and time range when GPS tracking is performed.
- Giving you the ability to stop tracking at any time.
- Giving you the ability to report users who are making you uncomfortable or sending spam.

We also store, use, and maintain your personal information using procedures designed to limit its loss, theft, or unauthorized access, use, modification, copying or disclosure. When you enter your login information (such as email and password) on BusPal, we encrypt the transmission of that information between the app and the server. As well, when applicable, we have contracts in place with our third party suppliers that obligate such suppliers to protect the confidentiality of your personal information. Despite these efforts, you should know that we cannot fully eliminate security risks associated with information. You are also responsible for helping to protect the security of your information and having a strong password that you've not used in other places is important.

CHILDREN

Children under the age of 13 are not permitted to create a BusPal account. We understand the importance of taking extra precautions to protect the privacy and safety of children. So we don't knowingly collect, use or disclose personal information from children under 13. If we learn that we have collected the personal information of a child under 13, we will take steps to delete the information as soon as possible.

WHEN THIS POLICY APPLIES

Our Privacy Policy applies to all of the Services offered by BusPal Inc. and its affiliates. It does not apply to services offered by other companies or individuals, including products or services that may be displayed to you in search results, or on BusPal optimized web pages.

ACCESS TO INFORMATION

You can access and update your information by going to the "Account" tab on the BusPal App. You can also request access, updating and corrections of inaccuracies in other personal information we have by emailing or writing to us at the contact information below. We may ask you for certain information in order to verify your identity.

DATA TRANSFERS

Our servers and our service providers may be located in the United States, Canada or other countries. Because of this, your personal information may be available to the U.S., Canadian or other government or its agencies under a lawful order made in that country. The laws of those countries may be less strict regarding your personal information than the laws where you live.

PRIVACY QUESTIONS

If you have any questions, comments, complaints or suggestions, please contact us at:

BusPal Inc.
Attention: Privacy Office
94 Glenngarry Cres
Maple, Ontario L6A 4Z4, Canada
support@buspal.net

Be sure to check back often for the latest information on our privacy practices. When we update this Privacy Policy we will change the “Last Updated” date above. As well, we may notify you of changes to this policy through BusPal or by email.