### **Privacy Policy**

We at Luma One Corporation. ("Company," "we," "us," "our") know that our users ("you," "your") care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy.

By visiting or using the various websites owned and operated by Company under the luma.one domain, including, without limitation, the <a href="https://luma.one/">https://luma.one/</a> website (the "Websites"), accessing or viewing videos hosted by Company (the "Videos") and/or accessing or using any other functionalities, features, content, applications or services offered from time to time by Company in connection with the Websites or Videos (collectively, the "Services") in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent to our collection, use, and sharing of your information in the following ways.

### I. What Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing, viewing or using any of our Websites, Videos and/or Services. This policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for the Services. If you are under 13, please do not attempt to register for the Services or send any information about yourself to us, including your name, telephone number, or email address. No one under age 13 may provide any Personal Information to us or through the Services. In the event that we learn that we have collected Personal Information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under age 13, please contact us at <a href="mailto:privacy@luma.one">privacy@luma.one</a>.

## II. What Information Does Company Collect?

We gather various types of Personal Information from our users, as explained more fully below. We may use this Personal Information to personalize and improve our Services, to administer and improve our Websites, to allow our users to set up a user account and profile, to contact users, to fulfill your requests for certain products and services, to analyze how users utilize the Websites, and as otherwise set forth in this Privacy Policy. We may share certain types of Personal Information with third parties (as described in this Section and in Section III below). At times, we may anonymize your Personal Information so that you cannot be individually identified, and provide that information to our partners. We collect the following types of information:

### A. Information You Provide to Us:

We may collect Personal Information from you when you visit any of our Websites, register for or subscribe to any Services, contact us with questions or concerns, and/or otherwise interact with the Services. For example, when you register for our Services, we may collect your name, email address, phone number, and payment card information. You can choose not to provide us with certain information, but then you may not be able to register with us or to take advantage of some of our features.

### **B. Information Collected Automatically:**

Whenever you or your users interact with any of our Websites or Videos, we automatically receive and record information on our server logs from your browser including your IP address, and usage data.

When we collect usage information (such as the numbers and frequency of visitors to a Website or video, survey or assessment data), we may use such information in two ways. We may use such information in aggregate form, and not in a manner that would identify you personally. For example, this aggregate information tells us how often users use parts of a Website, so that we can make such Website appealing to as many users as possible.

### C. E-mail and Other Communications:

We may contact you, by email or other means; for example, we may send you promotional offers on behalf of other businesses, or communicate with you about your use of any of the Websites. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make emails more interesting and improve our service. If you do not want to receive email or other mail from us, please indicate your preference by visiting our email preference page. Please note that if you do not want to receive legal notices from us, those legal notices will still govern your use of the Websites, and you are responsible for reviewing such legal notices for changes.

## III. Will Company Share Any of the Personal Information it Receives?

We share your Personal Information in personally identifiable form with third parties as described below. A.

## Affiliated Businesses and Third Party Websites We Do Not Control:

In certain situations, businesses or third party websites we're affiliated with may sell items or provide services to you through a website (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. We have no control over the policies and practices of third party websites as to privacy or anything else, so if you choose to enter into such transaction or to receive such service, please review the applicable third party websites' policies.

## B. Agents:

We employ other companies and people to perform tasks on our behalf and may need to share your Personal Information with them to provide products or services to you, for example, processing credit card payments. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. We acknowledge our potential liability if our agents misuse your Personal Information.

### C. User Profiles and Submissions:

Certain user profile information, including, without limitation, a user's name, location, and any video or image content that such user has uploaded to a Website, may be displayed to other users to facilitate user interaction within such Website or address your request for Company's services. Your account privacy settings allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others. Any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (on discussion boards, forums, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by others. Your user name may also be displayed to other users if and when you send messages or comments or upload images or videos through the Website and other users can contact you through messages and comments.

#### D. Video Data:

As mentioned above, we may provide Video owners with certain identifiable usage information directly related to the Videos that such Video owners make available through the Websites and Services. Such information may include how many and which Videos of a particular Video owner was watched by a particular user, from where a particular Video was watched by a particular user, how a particular user answered an assessment questions or other question. How much aggregate time a user has spent and how many times a particular Video was watched by a particular user,etc..

#### E. Business Transfers:

We may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that is transferred. Also, if we (or substantially all of our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information would be one of the assets transferred to or acquired by a third party.

## F. Protection of Company and Others:

We reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with law or court order; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of Company, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

### **G. With Your Consent:**

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

### IV. Is Personal Information About Me Secure?

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

The Websites may contain links to other sites. We are not responsible for the privacy policies and/or practices on other sites. When following a link to another site you should read that site's privacy policy.

## V. What Personal Information Can I Access?

You may request the correction, updating, or deletion of your Personal Information on our Websites by emailing us at <a href="mailto:privacy@luma.one">privacy@luma.one</a>. We will respond to all such requests within 30 days. If you request that your Personal Information be deleted from our records, there may be a brief delay in our processing that request, while we verify

that the request is valid and originates from you as opposed to an unauthorized third party. If you request that your Personal Information be deleted, we reserve the right to terminate and/or limit your access to the Websites and/or Services.

Under California Civil Code Sections 1798.83–1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: <a href="mailto:privacy@luma.one">privacy@luma.one</a>.

#### VI. What Choices Do I Have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our special features.

You may be able to add, update, or delete Personal Information as explained in Section V above. When you update information, however, we may maintain a copy of the unrevised information in our records. Please note that some information may remain in our private records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

We will also provide EU or Swiss individuals with opt-out or opt-in choice before we share their data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To limit the use and disclosure of your personal information, please submit a written request to <a href="mailto:privacy@luma.one">privacy@luma.one</a>.

## VII. Rights of European Data Subjects under the General Data Protection Regulation (GDPR)

If you are in one of the EU/EEA countries, you are entitled to certain rights under the General Data Protection Regulation (GDPR) EU Regulation 2016/679 and applicable national data protection regulations.

By visiting the Luma One Corporation Websites or communicating with Luma One Corporation, you acknowledge that we may process your Personal Information for the purposes described above, either on the basis of your consent or if we have other lawful grounds to do so.

You have the right to withdraw consent to processing, where consent is the basis of processing. For the Personal Information we collect on the Luma One Corporation Websites, this means you may withdraw your consent to processing by leaving the Luma One Corporation Websites, suspending your account if you have registered on our Websites, and requesting that we delete your Personal Information by contacting us at info@Luma One Corporation.com.

You have the right to access your Personal Information that we hold and request further details about how we process it, under certain conditions.

You have the right to demand rectification of inaccurate Personal Information about you. We will promptly correct any information found to be incorrect.

You have the right to object to unlawful data processing under certain conditions.

You have the right to erasure of past data about you (your "right to be forgotten") under certain conditions. You have the right to demand that we restrict processing of your Personal Information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, or if you believe your Personal Information is inaccurate.

You have the right to data portability of Personal Information concerning you that you provided us in a structured, commonly used, and machine-readable format, subject to certain conditions.

The Personal Information we collect on the Luma One Corporation Websites is not used for automated decision making and profiling, except for automated processes in the context of marketing. As stated above, you can optout of direct marketing by Luma One Corporation by contacting Luma One Corporation directly or by following the instructions through the unsubscribe options in our email messages.

You have a right to complain to a data protection supervisory authority in your country if you believe that Luma One Corporation is processing your Personal Information in violation of applicable laws. Luma One may be contacted at:

Luma One Corporation.

1730 St Laurent Blvd #800, Ottawa, ON K1G 3Y7

(613) 456-6222

Email: <a href="mailto:privacy@luma.one">privacy@luma.one</a>.

To learn more about your rights under the GDPR you can visit the European Commission's page on Protection of Personal Data, at: <a href="http://ec.europa.eu/justice/data-protection/index">http://ec.europa.eu/justice/data-protection/index</a> en.htm

# VIII. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on our Website or sending you an email. You are bound by any changes to the Privacy Policy when you use the Website after such changes have been first posted.

**IX.** Questions or Concerns; Contact Information If you have any questions or concerns regarding our privacy policies, please send us a detailed message to <a href="mailto:privacy@luma.one">privacy@luma.one</a>. Alternatively, you may contact us by telephone or postal service as follows. We will make every effort to resolve your concerns.

Luma One Corporation. 1730 St Laurent Blvd #800, Ottawa, ON K1G 3Y7 (613) 456-6222

Effective Date: April 2, 2019