DIVEAROO INC. PRIVACY POLICY

LAST UPDATED: 2024-10-05

1. OVERVIEW

At DIVEAROO INC. (the “Company”, “we” or “us”), we use our website and other internet-based tools for the following purpose:

> *Scuba diving and travel content, Scuba dive trip planning, Marine species data, Tools and calculators relevant to scuba diving.*

We are required to collect and retain information about the people and companies that access and use the website (“Users” or “you”). This Policy applies to our privacy practices on all communications between the Company and Users, including but not limited to communication via:

1. the Company website (including the website hosted at www.divearoo.com and any other web domain used by the Company to communicate with users now or in the future);
2. any mobile, computer, or tablet-based application currently offered by Company or developed in the future by the Company; and
3. all other services provided by the Company, as described on the Website (Items 1 to 3 are collectively referred to as the "Website").

This Privacy Policy (“Policy”) sets out how we use, protect, collect and preserve information submitted by Users, including User information gathered by our technology. This Policy should be read in conjunction with any Terms of Use or policies available on the Website.

By accessing or submitting any information through the Website, you are agreeing to the terms of this Policy. You are prohibited from accessing or using the Website unless you fully understand and agree to this Policy and all Terms of Use available for review on the Website.

If you have any questions about this Policy, please contact us by sending an email with your questions to support@divearoo.com before accessing or entering any information on the Website.

2. INFORMATION ABOUT USERS WE COLLECT AND STORE

When you choose to create an account on the Website, we will collect and retain all personal identifying information submitted to us.

We will take steps to protect the information submitted to us by Users and we will not disclose any personal identifying information without the consent of Users, unless otherwise set out in this Policy.

Personal identifying information may include but is not necessarily limited to:

> *Full Name, Email, Age, Location (IP address or user provided), Scuba certifications, and Scuba diving logs.*

We will not use personal identifying information to contact you for any reason unrelated to your use of the Website or for commercial reasons unrelated to the business of the Company. Except with your consent or where required by law, we will not provide personal identifying information to any third party.

3. UPLOADING PERSONAL INFORMATION

In order to facilitate their interactions on the Website, Users are able, where they deem appropriate, to upload information including personal identifying information. Users should only upload information to the extent that such information enhances their experience of using the Website.

4. ADDITIONAL DATA COLLECTED

To learn about your experience as a User and to make periodic improvements to the Website and our business, we may collect and retain certain information. We will automatically record information about your activity on the Website. This may include your Internet Protocol (IP) address, operating system, geolocation

information, locale preferences, identification numbers associated with your computers and mobile devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata, and other electronic interactions with the Company and the Website.

5. COOKIES

To facilitate the collection of information and to enhance the experience of Users of the Website, we use cookies which may be stored on Users' computers and/or devices so that we can recognize Users when they return. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, changing such settings may result in you not being able to use the Website, either in its entirety or certain features.

Using cookies, you may have the option to allow us to save your user ID and login password for future logins to the Website.

Cookies that are stored on your computer and/or device after visiting the Website may be recognized for advertising purposes and to show you targeted advertisements after you visit the Website.

For more information on the cookies we use or to opt-out, please contact us at support@divearoo.com.

6. REMARKETING

We may engage in "remarketing" activities using third-party services, which may include but are not limited to Google Ads, Google Analytics, and Facebook. By using the Website, you consent to allow us to provide information to third-party service parties who may present you with advertisements about the Company after you visit the Website. We will provide third-party providers of remarketing services with the minimum amount of information required to facilitate remarketing, and in no circumstances will Company provide any personal identifying information to third-parties for the purpose of remarketing.

7. PERMITTED USES OF DATA

We use data collected from the Website for various purposes, including to: provide the Website to you and accompanying customer support; notify you about updates and changes to the Website; prevent and address technical issues with the Website; monitor usage of the Website.

Without restriction, we may use any information you submit through the Website for any purpose we deem appropriate so long as it is anonymous and stripped of any and all personal identifying information.

We may use the data collected from the Website, devices, browsers, and any other sources, for its own purposes, both related to and unrelated to improving the Website.

8. LEGAL BASIS FOR PROCESSING PERSONAL IDENTIFYING INFORMATION

We may process your personal identifying information for a number of reasons, including:

- performing a contract with you relating to the Website;
- you have provided us consent to do so;
- fulfilling a legal obligation;
- fulfilling our legitimate interests, which are not overridden by your rights;
- for payment processing purposes.

9. ACCESSING, CORRECTING & DELETING YOUR PERSONAL INFORMATION

If you wish to access or amend your personal information or to request that we permanently delete your personal information from our servers, please send an email to support@divearoo.com. We will ensure your personal information is accessible, amended and/or deleted in a reasonable time after receiving that

request. Deleting such information may require us to terminate any account you may have created in its entirety and prevent you from using the Website.

So long as your account remains active, we will preserve your personal information in accordance with the Policy.

You may decline to share certain personal information with us, in which case you may not be able to use the Website, either in its entirety or certain features.

If you have not accessed your account for a total of 1 years, we may terminate your account, without notice, along with any personal information retained by us.

When deleting your information, whether by request or due to inactivity, we will use standard electronic means to remove your personal information from our files.

We will also retain any and all information that we are required to retain under any applicable laws for the full duration of time required under those laws.

10. KEEPING YOUR DATA SECURE

We will store your information in electronic format on industry-standard servers that we have selected. Except where required to do so by law, we will not store your personal information in any physical or paper-based format.

The servers we select to store information engage security software and generally accepted standards to protect personal information. The software used by these servers is intended to prevent unauthorized access or improper use.

However, no security system is perfect and there is always a risk of unauthorized parties accessing your personal information. Therefore, we make no guarantees or representations as to the technical or legal compliance of the servers we use. We cannot guarantee the complete protection and security of your personal information.

Our servers may be located outside of Canada, and thus are potentially subject to the privacy and security laws in force in other countries. If you have concerns about your personal information being stored electronically in foreign jurisdictions, please contact us before proceeding to use the Website.

11. SECURITY BREACHES

In the event the personal information of a User is disclosed as the result of any breach of security of the Website or its servers, regardless of who is at fault, we will take steps to advise all known affected Users within a reasonable timeframe of learning of the breach.

12. THIRD-PARTY APPLICATIONS

To provide an enhanced experience to Users, including to track conversions and analytics, we may engage services and features controlled by third-parties. We cannot control or dictate how any third-party application you use in conjunction with the Website, now or at any point in the future, will treat any personal information you transmit through their servers when using the Website. We advise you to contact these parties directly to review their privacy policies.

Without limitation, the Company uses or may use the following third-party applications and services in conjunction with the Website:

Google analytics, Vercel, Hotjar, Stripe, MapBox

By using any of these third-party application to interact with the Website, we will not be given access to your login credentials, user name, password, payment information, or any information you may provide directly to these applications.

13. USE OF WEBSITE BY MINORS

The Website is not intended to be accessed by persons under the age of 18. The Company does not engage in any marketing efforts aimed at children or minors.

Persons under the age of 18 are prohibited from using the Website without the express permission and direct supervision of a parent or guardian. Minors are prohibited from submitting any personal identifying information through the Website. The Company will immediately delete any personal identifying information submitted in violation of this Policy.

14. DISCLOSURE OF PERSONAL INFORMATION

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We may disclose your personal information to third parties:

1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
2. If the Company or its assets are acquired by a third party, in which case personal data about Users may be one of the transferred assets.
3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use; or to protect the rights, property, or safety of the Company, our Users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

15. USER REFERRAL SERVICE

You can choose to provide us with the names and email addresses of individuals or organizations that you feel would be interested in learning more about our products and services. When you choose to engage this service, we may send a preliminary email to each address provided to us, inviting the contact to visit

our website. We continue to store the contact details in order to track the success of our referral service.

16. AMENDING THIS POLICY

This Policy may be updated and amended from time to time. We reserve the right to change this Policy at any time, and any amended Policy is effective upon posting to the Website. We will make efforts to communicate any changes to this Policy we deem material, in our sole discretion, via email or notifications on the Website. Your continued use of the Website will be deemed acceptance of any amended Policy.

17. CONTACT US

We encourage you to send us questions and inquiries on this Policy and the steps we take to keep your personal information secure. Please send us an email: support@divearoo.com

We will respond to all inquiries on the Policy within 60 days.