

## **PRIVACY POLICY**

At Icon AI, “we”, “us” or “Icon”), we respect the privacy rights of individuals and we are committed to keeping personal information accurate, confidential, and secure. We have adopted the following Privacy Policy to ensure that we continue to meet our commitment to privacy. Please review our Privacy Policy carefully to understand how we collect, use, protect and handle your personal information.

### **Introduction**

We provide a unique custom service where we allow users to “try on” and see how they look in various curated closing ensembles/collections. In the course of selling and providing our services, we may collect, with consent, certain personal information about you, whether through our website on any application we utilize. We are responsible for the personal information of our customers that we collect, use or disclose.

“Personal Information” means information about an identifiable individual. This may, for example, include, without limitation, the individual's name, home address, age, income or other financial information. Personal Information does not include the name, title, business address or telephone number of an employee of an organization.

This Privacy Policy describes the principles that we follow to ensure that we protect Personal Information that we receive, collect, use or disclose in the course of carrying on our business. All of our employees who have access to Personal Information must adhere to this Privacy Policy and related procedures. To this end, we have appointed a Chief Privacy Officer to ensure compliance by all of our employees and to address privacy concerns.

By submitting your Personal Information to us through your use of our website or otherwise, you signify your consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not provide any Personal Information to us through the website, or any other manner.

### **Accountability**

We have designated a Chief Privacy Officer. The Chief Privacy Officer is ultimately responsible for Personal Information under our control and is accountable for compliance with the terms and procedures of this Privacy Policy. Any individual that has questions regarding our procedures or wishes to make a complaint about our Personal Information handling practices should contact the Chief Privacy Officer. For contact information, please refer to the heading “Questions, Concerns and Complaints” below.

### **What Do We Do With Your Information?**

A. When you use our services, upload photos, complete information about yourself, as part of the services we offer, we collect the personal information you give us such as your name,

address phone number and email address, as well as other information that we believe may enhance or improve the experience we offer to our customers.

B. When you use our website (whether or not you pay for any services or products), we also automatically receive your computer's internet protocol (IP) address in order to provide us with information that helps us learn about your browser and operating system.

C. Email marketing: With your permission, we may send you emails about our store, your order(s), new products or services and other updates or information we believe may be of interest to you.

D. Our website is hosted by Microsoft Azure Services on that company's servers or the servers of other parties with whom they contract. Your data is stored through Microsoft's data storage, databases, as well as through the general Icon website and other applications. Your data is stored on a secure server behind a firewall. If you have questions regarding Microsoft's privacy policies and terms, please visit the Microsoft website at <https://privacy.microsoft.com/en-ca/privacystatement>.

E. We use Stripe to process payments. If you choose a direct payment gateway to complete your purchase, then Stripe stores your credit card data. It is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted. All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

### **Consent**

By using our website or submitting information to us through our website, any application or otherwise, you hereby impliedly grant your consent to our collective, use, storage and disclosure of your Personal Information. This Privacy Policy has been prepared to ensure that you are advised of the identified purposes for which your Personal Information will be used or disclosed.

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice. Icon will inform an individual of the implications of such withdrawal. However, we may collect, use or disclose Personal Information without an individual's knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or required by law, or where you violate our Terms of Service.

If, after you opt-in, you change your mind, you may withdraw your consent for us to contact you, or for the continued collection, use or disclosure of your Personal Information, at any time, by contacting us at:

Email: kfockter@iconai.app

Mail: Icon AI Corporation  
41 Hillside Drive,  
Aurora, Ontario, L4G 6C9

Attention: Chief Privacy Officer

### **Limiting Collection**

The information collected by us will be limited to those details necessary for the purposes we have identified and to perform the services requested. Information will be collected by fair and lawful means.

### **The Kind of Information We Collect**

Icon receives Personal Information (to the extent you provide it) including a customer's name, contact information, home address, date of birth, bank account or financial information, debit and credit card information and related purchase details.

Icon gathers and uses Personal Information in order to provide the products and services requested. We may also use Personal Information to update our services and to offer additional products or services that our customers may be interested in.

If you use our Application or the website, we do not collect personally identifiable information about you unless you provide it. All information that you do provide us with is securely maintained and kept strictly confidential. This Privacy Policy does not apply to aggregated data from which it is not possible to determine the identity of a specific individual. We reserve the right to use aggregated data in any manner that we determine is reasonable and/or appropriate. By accessing and browsing our website or Application, you agree that we may collect, use and disclose any Personal Information about you through our website and any other application as described in this Privacy Policy.

If you submit information and content to any public area of our website such as customer reviews, blogs, questions and answers, chat rooms, open forums, customer photos, such information and content will be considered "public" by us and will not be subject to any of the privacy protections or limitations set out in this Privacy Policy.

### **Anonymous Information and “Cookies”**

We may collect anonymous information about you. This means that the information collected cannot be traced back to a specific person. For example, our web servers may record certain information automatically when you visit our website or use any of our applications. This information is collected using “cookies” and might include the pages you visited, your IP (Internet Protocol) address and other site usage statistics. This anonymous information is used for research and analytical purposes only (like evaluating how many visitors our website or any application receives or which pages are visited most often). It does not reveal any Personal Information about you, the user. This aggregate data may be disclosed to third parties, but never with personally identifying information.

“Cookies” are small text files that contain a unique identification number that allows our computers to identify your web browser (but not you) each time you visit our website or use any of our applications. The information helps us improve the functionality of the website and any of our applications and enhance the navigation and security of your session. Most major websites use this technology and most browsers are set up to accept them.

Please refer to our Cookie Policy for information about cookies and how we use them.

### **Limiting Use, Disclosure and Retention**

Personal Information will only be used or disclosed for the purpose for which it was collected or received unless you have otherwise consented.

In certain exceptional circumstances, we may have a legal duty or right to disclose Personal Information without your knowledge or consent.

### **How We Use Your Information**

We may use Personal Information to carry out one or more of the following:

- To communicate with you in order to provide and market our products and services.
- To assist in the development and marketing of our products and services.
- To forward, directly or indirectly, to financial institutions and debit and credit card associations (including Visa, Mastercard and Interac).
- To develop, enhance, market, sell, provide and inform our customers of products and services of third parties, including our affiliates with whom we have a commercial relationship.
- To update and verify our databases and information provided by third parties.

- To improve and facilitate the functionality and customer experience of our website.
- To engage in business transactions, including without limitation, the reorganization, purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposition, securitization or financing involving Icon or its affiliates.

We generally will only use Personal Information for the purposes (or comparable purposes) that we have previously disclosed. If, in the future, we want to use your Personal Information for a different purpose(s) that would be materially less restrictive than as stated in the version of the Privacy Policy that was in effect at the time we received your Personal Information, we will make reasonable efforts to notify you and obtain your consent to any such expanded or new uses as may be required by law.

### **With Whom We May Share Information**

#### **(i) Our Employees:**

In the course of daily operations, access to Personal Information is limited to those employees with a legitimate reason for accessing it. As a condition of their employment, our employees are required to follow all applicable laws and regulations, including this Privacy Policy. Unauthorized use or disclosure of confidential Personal Information by any of our employees is prohibited and may result in disciplinary measures.

#### **(ii) Our Affiliates:**

In order to better meet our customers' needs, we may share some Personal Information with our affiliates. Should you not want to receive promotional materials from or have your Personal Information shared with our affiliates please contact the Chief Privacy Officer at the address, phone number or email address provided at the end of this Policy.

#### **(iii) Icon's Third Party Contractors:**

We may engage and coordinate third party contractors to provide you with certain services or products offered through our website or any application we might also use. Such contractors are only given the information that is needed to provide the specific service or product for which we contract them to provide. Contractors are obliged to protect the confidentiality of your Personal Information and are prohibited from doing anything with this information that we have not authorized them to do. They are required to treat your Personal Information in a manner consistent with our Privacy Policy. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. Typical examples of such third party contractors would include, but are not limited to, persons:

- (a) Providing payment processing;
- (b) Providing fulfillment services (delivery, communications);
- (c) Providing data verification and fraud prevention services; and
- (d) Providing application measurement and performance assessments.

(iv) **Sale and Financing of Business**

We may transfer your Personal Information to a third party in connection with a reorganization, sale, merger or other disposition (whether of assets, stock or otherwise) of our business. Personal Information may be disclosed to a financier or potential successor of our business, for the purpose of allowing the financier or potential successor to assess and evaluate our operations.

**Third-Party Service Providers**

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers. In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the *Patriot Act*. Once you leave our store's website or any of our applications or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

**Links**

When you click on links on our store or in any of our applications, they may direct you away from our website or our Application. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements/policies. Many of these links relate to social media platforms. Please be advised that Personal Information you voluntarily share and transmit online in publicly accessible blogs, chat rooms, social media platforms or other open forums can be viewed by others without any restrictions. We have no control over your Personal Information when you interact with social media platforms and you must assume any and all risks in providing Personal Information through such platforms or other open forums.

**Safeguarding Information**

Personal Information is safeguarded using measures appropriate to the sensitivity of the information.

### **How We Safeguard Information**

We will use reasonable efforts and security measures to protect Personal Information against loss or theft, as well as unauthorized access, use and disclosure. We have controls in place to maintain the security of our information and information systems. Files containing Personal Information are stored according to the sensitivity of the information contained therein and are backed up at offsite locations. Appropriate technological controls (such as passwords, encryption, firewalls) are placed on our computer systems and data processing procedures. Physical controls (such as locked filing cabinets, restricting access to offices, alarm systems) are in place as are organizational controls (such as staff training and access on a “need to know basis”).

We may store and process your Personal Information at our offices in Canada, or elsewhere, including outside Canada. To the extent we employ third-party service providers to store, access, handle or process Personal Information on our behalf; we will use contractual and other means in an attempt to provide a comparable level of protection. Service providers, however, may be located in various countries, so please be aware that authorized officials of governments in those countries may be lawfully able to access your Personal Information without your knowledge or consent pursuant to the laws of such countries.

### **Website Security**

Our website and any of our applications may contain links to other websites, including those of our business partners. We are in no way responsible and cannot guarantee the content or privacy of other sites linked to our website or our applications.

### **Age of Consent**

By using our Website and any of our applications, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use our website or any of our applications. We do not knowingly collect information from or about persons younger than thirteen years of age and if we became aware of such collection, such information will be deleted.

### **Changes to the Privacy Policy**

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on our website or in a link on any of our applications. If we make material changes to this Privacy Policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it. If our company is acquired or merged with another company, your information may be transferred to the new owners so that we or the new owners may continue to sell products or provide services to you.

### **Addressing Complaints and Suggestions**

You may ask questions about our compliance with this Privacy Policy. We have policies and procedures to receive, investigate and respond to complaints and questions regarding this Privacy Policy and our receipt, collection, use and disclosure of Personal Information. Complaints will be investigated and where a complaint is found to be justified, we will take appropriate measures, including amending our policies and practices, when necessary. You may contact our Chief Privacy Officer to make a complaint, express any concerns or to request access to your Personal Information.

### **Questions, Concerns and Complaints**

If you have any questions, concerns or complaints about your Personal Information, or about the Icon Privacy Policy, please contact our Chief Privacy Officer, Krisztian Fockter, using the contact information provided below:

By Email:                    kfockter@iconai.app

Or by mail at:            Icon AI Corporation  
41 Hillside Drive,  
Aurora, Ontario, L4G 6C9

Attention:                Krisztian Fockter, Chief Privacy Officer