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North Charge Inc., and its affiliates (together, “**North Charge Inc.**” or “**We**”), collects, uses, and discloses your personal information in relation to North Charge Inc.’s websites, applications, products, and services (together, “**North Charge Inc. Products**”) in the manner specified in this Privacy Policy.

This North Charge Inc. General Privacy Policy (“**Privacy Policy**”) contains important information about your rights when processing your personal information as well as the legal principles based on which we process your personal information for our customers, users and recruitment related operations. It does not apply to personal information we obtain in our capacity as an employer.

In Canada, “personal information” is information about an “identifiable individual” that on its own or combined with other pieces of data, can identify you directly or indirectly, as an individual. This Privacy Policy informs you about the processing of your personal information by North Charge Inc. when you create, use, or otherwise manage the North Charge Inc. Account and their related services.

We do not knowingly collect personal information from anyone under 18 years of age unless such personal information is provided to us through the consent of the minor’s parent(s) or legal guardian(s).

Any products, services, websites, or contents that are offered by third parties or have their own Privacy Policy are not covered by this Privacy Policy.

1. What We Collect

We may collect your personal information in the course of providing North Charge Inc. Products to you. The collection of your personal information shall be made in accordance with this Privacy Policy and other relevant privacy policies where processed in connection with North Charge Inc. Products and as permitted by applicable data protection laws of relevant jurisdictions.

Here are the sources from which we gather your information:

- **EV Charger Information:** Your North Charge Inc. EV Charger generates EV Charger, diagnostic, and system data.
- **Information Given to Us:** You may provide us with information about you in relation to North Charge Inc. Products.
- **Automatic Information:** Certain types of information are automatically obtained by us when you interact with North Charge Inc. Products.



- **Other Sources of Information:** We may receive information about you from other sources such as service suppliers, financial institutions, social media platforms, and public sources.

Depending on the North Charge Inc. Products and services you request, own, or use, not all of the sources listed below may be applicable to you. We may combine information we collect from one source with information we receive from other sources. Depending on the nature of our relationship, we may collect different types of information, as described below:

Before Purchase

When you visit our website, showrooms, attend a North Charge Inc. event, perform a test drive, interact with us, contact us with questions or for product information (in person, online, telephone, and email), we may collect a variety of information from or about you, your EV Charger, devices, or from third parties. For example, data we collect may include:

Categories of Data	Description	Purposes
Contact Information	Your name, address, region, email, phone number, contact preference	To communicate with you about surveys, events, information about our products and services, process your requests, and provide and improve products or services
Communications or interactions	Your requests for information, calls, emails, information submitted through surveys, in person communications, tours, newsletter, North Charge Inc. events, and test drives	To communicate with you, confirm eligibility, solicit feedback, support targeted advertising, prevent and address fraud, and provide products or services
Network activity information	Your device model, browser type, operating system, region, IP address, pixel tags, and cookies	To optimize website and app performance, targeted advertising, prevent and address fraud, maintain security, and marketing and personalization



Information from or about you

We may also receive information about you from sources such as public databases, joint marketing partners, certified installers, affiliates and business partners, and social media platforms.

Please see the Internet Advertising and Third Parties section below for additional information about how we collect, use, and disclose information regarding your interactions with our website and mobile applications.

When You Are a North Charge Inc. Customer

If you are a North Charge Inc. product owner or benefit from a North Charge Inc. service, we may also collect other information from or about you, your North Charge Inc. EV Charger, energy products, or from third parties. We may collect such information either through remote access or in person (for example, during a service appointment). Depending on which of our products and services you request or use, not all of these types of information may be applicable to you.

North Charge Inc. Account: Customers who purchase certain North Charge Inc. products may also create a North Charge Inc. Account, which is hosted on our website. You can access your North Charge Inc. Account to update the information from or about you in that account at any time. The information contained in your account may include:

- The status of your order
- Your customer registration information
- Warranty and other documentation for your North Charge Inc. products
- Charging history
- Payment method information
- Other general information about your North Charge Inc. products
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Information from or about you

Categories of Data	Description	Purpose
Order information	Your purchase details, order agreement, trade-in information, and other pre-delivery documents and may include driver's license	To fulfill your request for products and services and comply with legal requirements



	or government identification (only when it is required by law)	
Financial information	Your payment method, bank account number, credit card details, financing, lease, or credit application information	To process your payment for the product or service purchased and to comply with legal requirements
Customer support activity	Customer interactions, date, resolutions, towing services	To provide customer service and technical support and to improve our service offerings

Information from or about your North Charge Inc. EV Charger

Categories of Data	Description	Purposes
EV Charger type	EV Charger year, make, model, configuration	To fulfill your request for products and services and to improve our products and services
EV Charger data	Telemetry regarding performance, usage, operation, and health of your EV Charger	To provide you with services, maintenance (including remote EV Charger diagnostics and support), and improve your EV Charger over time, to improve our products and services, to comply with applicable laws, to participate in government programs, and to protect the rights, property, or safety of you, us, or others engage
EV Charger and device location	Derived from GPS, Bluetooth, IP address, Wi-Fi and cellular connections associated with EV Chargers or devices	Your North Charge Inc. EV Charger uses EV Charger and device location to power features such as in-EV Charger maps, navigation, and other location services. Location Services may use a combination of GPS, Bluetooth, IP address, and Wi-Fi and mobile towers to determine where you are.



Charging information	Charging station used, utilization, charge rate, battery analytics, VIN, and performance	To fulfill your request for services based on our contract with you, improve charging networks, to triage and fix potential issues, to comply with applicable laws, to reconcile payments made on behalf of charging partners, to participate in government programs, and to protect the rights, property, or safety of you, us, or others
Diagnostic data	Logs for identifying and troubleshooting unexpected software or connectivity issues, and other debugging log reports	To triage and fix software or product issues (including remote EV Charger diagnostics and support), to improve our products and services, to participate in government programs, to comply with applicable laws, and to protect the rights, property, or safety of you, us, or others
North Charge Inc. mobile app information	Analytics regarding mobile app usage such as function successfully or unsuccessfully loaded	To ensure reliability of the app, and perform maintenance, to triage and fix potential issues, to comply with applicable laws, to address fraud, to promote security, and to improve our products and services
North Charge Inc. service and repair history	Service facility, date, mileage, repairs conducted, estimate and cost, parts details, and other similar information	To provide service and repairs, to triage and fix potential issues, to provide customer service, and to address legal requirements

Information from or about your North Charge Inc. energy products

Categories of Data	Description	Purposes
Charging product data	Data regarding performance, usage, operation, battery efficiency, and condition of your charging product	To provide you with services, security of functionality, participate in government programs or obtain government benefits, improve our products over time, and to



		protect the rights, property, or safety of you, us, or others
Energy diagnostic logs	Logs for identifying and troubleshooting unexpected software or connectivity issues, and other debugging log reports	To triage and fix software or product issues (including remote EV Charger diagnostics and support) to participate in government programs, and to protect the rights, property, or safety of you, us, or others

Opting out of EV Charger data: Connectivity is a core part of all North Charge Inc. EV Chargers and why some customers choose North Charge Inc., allowing for advanced features and an enhanced driving experience. North Charge Inc. provides this seamless experience while protecting your privacy. However, if you no longer wish for us to collect EV Charger data or any other data from your North Charge Inc. EV Charger, you can turn-off data sharing and location data sharing via the privacy settings of your EV Charger. Please note, certain advanced features such as over-the-air updates, remote services, and interactivity with mobile applications and in-car features such as location search, Internet radio, voice commands, and web browser functionality rely on such connectivity. If you choose to opt out of EV Charger data collection (with the exception of certain data sharing preferences), we will not be able to know or notify you of issues applicable to your EV Charger in real time. This may result in your EV Charger suffering from reduced functionality, serious damage, or inoperability.

2. How We Use Your Information

Your personal information may be used to administer, deliver, and improve North Charge Inc. Products. We may use personal information for the following purposes, amongst others:

- Operate and provide North Charge Inc. Products: To administer, process and deliver North Charge Inc. Products and handle contracts related to North Charge Inc. Products, including without limitation registrations, subscriptions, loyalty programs, surveys, purchases, incentive programs and payments.
- Assess, evaluate, and improve North Charge Inc. Products: To assess product use, evaluate performance, fix errors, support, and develop North Charge Inc. Products, including without limitation registrations, subscriptions, loyalty programs, surveys, purchases, incentive programs and payments.
- Recommendations and Personalization: To recommend North Charge Inc. Products that you may like, recognize your preferences, and personalize your experience with North Charge Inc. Products.



- Comply with law: In certain cases, we have a legal obligation to collect, use, or retain your personal information. We may also use and disclose information about you if we believe in good faith that that the law requires it for purposes of security, fulfilling our legal obligations (such as subpoenas or court orders), law enforcement, or other issues of public importance. We may also share information about you, where there are legal grounds to do so, if we determine that disclosure is reasonably necessary to enforce our Terms of Use or protect our operations or customers. This could include providing information to public or governmental authorities.
- Contact you: To communicate with you in relation to North Charge Inc. Products through relevant channels such as email and chat and to answer your requests. This includes contacting you (or other necessary parties) to advise you of important safety-related information, or to notify first responders in the event of an accident involving North Charge Inc. Products.
- Marketing: To promote North Charge Inc. Products in accordance with applicable laws. We may display interest-based ads for North Charge Inc. Products.
- Prevention of fraud and abuse and credit risks: To locate and handle fraud to protect our customers, ourselves, and others. We may also use scoring methods to assess and manage credit risks.
- Other purposes where consent is required: We may ask for your consent when we use your personal information for certain relevant purposes that we communicate to you.
- Below please find additional information about some of the purposes for which we process information about you or your EV Charger.

Safety and security: In order to help improve our products and services, we may collect and store information that identifies you or your EV Charger's serial number, including: data about accidents or near accident-like circumstances involving your North Charge Inc. EV Charger; a data report to confirm that your EV Charger is online together with information about the current software version and certain telematics data; data about any issues that could materially impair operation of your EV Charger; data about any safety-critical issues; and data about each software and firmware update. **Please note that our EV Chargers are designed to provide certain safety and security connective services by default. If your EV Charger systems indicate that an accident may have occurred, your EV Charger will transmit certain EV Charger status and location data to us to help us connect with emergency service providers. Our EV Chargers are designed to receive and install updates to EV Charger systems. These features cannot be disabled.**

Advanced features: You can enable or disable the collection of this data at any time via the privacy settings of your EV Charger, please consult your user manual or contact us for



assistance. If enabled, we may disclose to service partners information about road or traffic conditions in a way that does not directly identify you or your serial no.. This sharing may occur even if you are not actively using a feature that needs this information.

North Charge Inc. App: The North Charge Inc. App (the “App”) puts owners in direct communication with their EV Chargers. With the App, you may have the capability to do things like check your EV Charger’s charging progress in real time and start/stop charging. In order to detect and proactively fix issues related to the App’s functionality, address customer complaints, and to prevent unauthorized access or misuse, certain general usage information associated with your account be shared with us. For example, if you use the App to start charging your EV Charger, we may collect that this command was successful or unsuccessful, without any further details, such as duration of charging.

3. Our Use of Cookies

We automatically collect certain types of usage information when you visit our website, use our software applications, engage with our social media pages, emails or other digital services. We typically collect this information through a variety of tracking technologies, including cookies, and similar technologies like single-pixel GIFs, web beacons and Flash LSOs (collectively, “tracking technologies”). For example, we may collect information such as your domain name, browser type, operating system, IP address, web pages viewed while visiting our site or using our digital services, links clicked, length of time spent on our website and reference website from which you accessed the site.

If you do not wish to allow tracking technologies, you may be able to disable them. Although this may provide you with enhanced anonymity, it may affect the functioning of our website or digital services. However, please note that you cannot control, delete, or disable the acceptance of Flash LSOs through your web browser in the same way that you can disable cookies. For more information on Flash LSOs, or to learn how to manage your settings for Flash LSOs, go to the Adobe Flash Player Help Page.

We may collect analytics data, or use third-party analytics tools like Google Analytics, to help us measure traffic and usage trends for the website and to better understand the demographics of our users. In gathering this information, we are able to enhance your experience when visiting our website. You can learn how to opt-out of analytics by downloading the Google Analytics opt-out browser add-on, available [here](#).

- We may also use social plugins on our website, such as Facebook, YouTube, Instagram and LinkedIn. When you view a site that contains a plugin, your browser will create a direct link to the social media platform’s servers. If you are logged into your social media account, the social media platform will record the visit to your social media account. Please visit the social media platform’s privacy policy for more information.



- Third parties may also collect information via tracking technologies when you interact with our products. Third parties usually include search engines, providers of measurement and analytics services, social media networks and advertising companies. The use of these technologies and any information about you that third parties collect is governed by each third-party's specific privacy policy. It is not governed by a North Charge Inc. Privacy Policy. Likewise, our products may include third-party advertising and links to other websites and applications. Third-party advertising partners may collect information about you when you interact with their content, advertising, or services. Any access to, and use of, third-party links or websites is not governed by this Privacy Policy but instead is governed by the privacy policies of those third-party operators. We are not responsible for the information practices of these third parties.
- We may use cookies to recognize your browser or device, understand more about your preferences, deliver to you certain basic features and services, and for other purposes, such as:
 - Identifying you when you sign in to use North Charge Inc. Products. This allows us to provide you with suggestions, display content personalized to you, and provide other customized features and services.
 - Storing your preferences so we can know what you like and do not like, such as the language and configuration that you chose.
 - Researching and analyzing information to improve North Charge Inc. Products.
 - Complying with legal obligations as part of our general business operations.
 - Preventing fraud and situations that cause a potential threat to the safety or property of any person.
 - Securing your information and our services from unauthorized access, loss, and misuse. Improving safety.
 - Delivering content, including ads, relevant to your interests on our sites and third-party sites.
 - Evaluating the performance of North Charge Inc. Products.
 - Cookies allow you to utilize certain essential features of ours. Because of this, if you reject our cookies, you may be unable to use certain products that require your sign-in information, or you may have to adjust some preferences or language settings manually every time you visit our sites or applications.

You can manage browser cookies through your browser settings. Through the 'Help' feature on most browsers, you can learn how to prevent your browser from accepting new cookies, how to receive notifications from the browser when you receive a new cookie, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may need to manually



adjust some preferences every time you visit a site or application, and some features and services may not work.

4. How We Share Information

Information about our customers is important to us and our business does not sell our customers' personal information to others for monetary consideration. We share personal information only as described in this Privacy Policy. We may also share personal information with our affiliates when it is allowed and in compliance with applicable data protection laws.

The table below illustrates who North Charge Inc. may share your personal information with depending on your interactions with us or purchases you make.

Our service providers, business partners and affiliates

Categories of Recipients	Description	Reasons for Sharing
Affiliates and subsidiaries	Companies that are owned or controlled by North Charge Inc.	To assist, operate, enhance, and fulfill services on our behalf
Service providers and business partners	Companies we've hired to provide services such as customer support, product financing, repair estimate providers, infrastructure, and other professional service providers	To assist, operate, and fulfill services on our behalf
Payment processors	Companies we contract with to securely process your payment details	To enable payment processing based on our contract with you, and fraud prevention

Third parties you authorize

Categories of Recipients	Description	Reasons for Sharing
Financial institutions	Companies that process credit applications for	To confirm your eligibility, and process your request for service



	lease and financing offerings	
Energy utilities and energy services companies	Companies that deploy and distribute energy to your home from the grid	To fulfill your request for energy products and services
Certified energy installers	Partners who may perform financing, permitting, inspections and installations	To perform, assist, and fulfill services on either our behalf
Third party service and repair centers	Third party service locations we partner with to provide you with quality repair	To facilitate service and repairs, and improve costs and services based on your request
Third Party Service Partners	Companies that provide services in our EV Chargers or via the North Charge Inc. app, such as music or video streaming services.	To enable you to obtain and use services provided by third parties subject to your direction
Third Party in the course of a business-to-business relationships (Rental cars, fleet EV Chargers, third parties, etc.)	Companies and third parties that rent, lease, provide, or otherwise offer you a North Charge Inc. EV Charger for any business or personal use	To assist with EV Charger and fleet management for companies that offer North Charge Inc. EV Chargers to customers, employees, or for use as fleet EV Chargers, including for other legitimate purposes as described by such third parties to you.



Other third parties as required by law or other circumstances

Categories of Recipients	Description	Reasons for Sharing
Law enforcement and government authorities	Disclosure of information as required by law, or when otherwise appropriate	To comply with applicable laws, and cooperate with investigations, participate in government programs
Government-offered incentive or credit programs	Disclosure of information as required by the program such as serial number	To comply with the participation terms of the offered program
Third parties subject to legal process or request	Information sought via court order, subpoena, or other legal request	To comply with law or cooperate with reasonable investigations or requests
Third parties in emergencies	When applicable laws require it or upon your consent, information reasonably needed to address an apparent emergency	To protect the rights, safety, or property of you, us, or others

We may share information in the following circumstances:

- **Transactions Involving Third Parties:** We make available to you services, software, and content provided by third parties for use on or through North Charge Inc. Products. We will disclose when a third party participates in a transaction with you and we may share information relevant to that transaction with that third party.
- **Third-Party Service Providers:** We employ and/or cooperate with other companies and individuals to perform certain functions and carry out certain incentive programs, cross-sale programs, etc. Other examples may include sending communications, processing payments, evaluating credit and compliance risks, reviewing interest-supporting programs, analyzing data, providing marketing and sales support (including advertising and event management), managing customer relationships, and training. These third party providers have access to personal information needed to perform their roles, but we do not permit them to use it for any other purposes. Further, we require them to adhere to applicable data protection laws.



- Restructuring, Business Transfers, business transactions: As we continue to develop our business, we may restructure, sell, or buy businesses or services, or otherwise make a business transactions such as the making of a loan in accordance with applicable laws. In such transactions, personal information, databases and right to use information may be transferred as business assets or assessed by authorized third parties but the recipients remain subject to this Privacy Policy and individuals' consents where applicable. Also, in the event that North Charge Inc. or substantially all of its assets are acquired, your information will be one of the transferred assets. We may share personal information with third parties as reasonably necessary to negotiate or complete a merger, acquisition, or sale of all or part of our assets in accordance with applicable data protection laws.
- Protection of Us and Others: We may disclose account and other personal information when we believe such disclosure is required by law, to enforce or apply our terms and other agreements, or to protect the rights, assets, or the safety of ourselves, our customers, or others. This may include releasing or exchanging information to other organizations for fraud prevention and detection and credit and property risk reduction.
- Repair estimate providers and insurance companies: We may disclose information to enable North Charge Inc. or third-party service centers to perform services on your EV Charger such as repair or maintenance. When you request North Charge Inc. to perform certain services, we share limited information about you and the EV Charger with these parties to help provide you with an accurate repair estimate and to facilitate payment. Repair estimate providers may use this information in the aggregate to create and publish industry anonymized analytics.
- Third parties you authorize, such as:
 - Certified installers, where we may directly or indirectly sell you the energy products that you have requested, or where the certified installer owns or is financing your energy products.
 - Third party utilities or energy services companies, where required by tariff or regulation or you have agreed to allow them to monitor or control your energy product.
 - With third party service centers or providers, if you choose to utilize them. Note that some information about you is stored on certain North Charge Inc. products and may be accessible directly to the third party service centers or providers that you choose to utilize to diagnose or service your North Charge Inc. product.
 - Third-party sponsors of contests and similar promotions, if you choose to participate. With your social media account provider, if you connect your North Charge Inc. Account and your social media account. If you do so, you authorize



us to share information with your social media account provider and you understand that the use of the information we share will be governed by the social media account provider's privacy notice.

Your Choice: Other than as set out above, you will be notified when your personal information is shared with third parties, and you may be able to choose not to share the information.

5. Where We Store

North Charge Inc. has office in Canada. Depending on your use of North Charge Inc. Products, your personal information may be stored in or accessed on cloud hosting secured servers.

Whenever we transfer personal information to other countries, we make sure that the information is done so in accordance with this Privacy Policy and as authorized by applicable data protection laws.

6. How We Secure

At North Charge Inc., security is a priority. We design our systems with your security and privacy in mind.

- We employ technical and security measures designed to prevent unauthorized access and use of your personal information. Despite our efforts, no data security measures can guarantee security. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

Your payment card information, which is issued by the relevant financial institution, is protected by us in accordance with international standards on the principle that no important data of the card (card numbers, full names, CVV numbers) is recorded in our system. Your payment transaction is conducted via third-party systems (STRIPE).

7. Internet Advertising and Third Parties

North Charge Inc. websites and mobile applications may include third-party advertising and links to other websites and applications. Third party advertising partners may collect information about you when you interact with their content, advertising, or services. Any access to and use of third party links or websites is not governed by this Privacy Policy, but instead is governed by the privacy policies of those third party operators. To support targeted advertising, we may disclose identifiers, demographics, transaction information, inferences about your characteristics,



general location information, and internet and network activity information. We are not responsible for the Information practices of third parties. To opt out of interest based advertising, please see Collection and Use of Cookies above.

Third-Party Analytics. North Charge Inc. Products may use services operated by third parties, such as Google Analytics, which uses cookies and similar technologies to understand use of North Charge Inc. Products and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources over time.

Social Plugins. We may use social plugins on our site, such as: Facebook, YouTube, Instagram and LinkedIn. When you view a site that contains a plugin, your browser will create a direct link to the third parties' servers. If you are logged into your social media account, the social media platform will record the visit to your social media account. Please visit the social media platform's privacy policy for more information.

8. Rights and Options

You can access your account to view, update, and remove certain personal information and information about your interactions with North Charge Inc. Products. Many North Charge Inc. Products include settings that provide you with options as to how your information is being used. You may be able to choose to not provide certain information or to disable certain data collection. This may impact the functionality of certain North Charge Inc. Products.

- **Account Information:** If you want to add, update, or delete information related to your account, please go to your account in the North Charge Inc. website or North Charge Inc. App. When you update or delete any information, we may keep a copy of the prior version for our records for technical purposes.
- **Communications:** If you do not want to receive promotional communications from us, please opt out using the unsubscribe mechanisms associated with the communication. If you do not want to receive in-App notifications from us, please adjust your notification settings in the App, your device, or EV Charger.

You may assert the following rights against North Charge Inc. at any time. In such cases, we need to verify your identity by minimizing the data collection related to this process. Further information about your rights can be found at the following link, <https://North Charge Inc.auto.ca/en/dsr-form>.

Right to information: you have the right to receive confirmation as to whether and which personal information we process about you and to know to which third parties your personal information has been transmitted domestically or abroad. You also have the right to receive from us a copy of the personal information that is subject to processing.



Right to rectification: you have the right to request from us the rectification of incomplete or inaccurate personal information concerning you. You can also require third parties to whom we have transmitted your personal information to rectify your information.

Right to erasure: you have the right, to request the erasure of your personal information when:

- The information is obsolete.
- The retention of your information is no longer justified for the purpose for which it was collected.
- You think that the information was not collected in a lawful manner.

Right of withdrawal: Subject to applicable laws, when the processing of your personal information is based on your consent, you have the right, at any time, to revoke your consent <https://www.northcharge.ca/contact> using the contact information mentioned below. Please note that withdrawal of your consent to the processing of your personal information may lead to the incapacity for us to provide you with such Connected Service or may limit the quality of such service.

Right to lodge a complaint: You also have the right to lodge a complaint with a supervisory authority about our processing of your personal information. This may, for example, be the supervisory authority of your province. For the list of all data protection supervisory authorities in Canada visit: <https://www.priv.gc.ca/en/about-the-opc/what-we-do/provincial-and-territorial-collaboration/provincial-and-territorial-privacy-laws-and-oversight/>.

Right to informational self-determination: For Connected Services, we offer you default settings that protect privacy and the ability to easily change settings throughout the processing. In particular, you have the option activating or deactivating services based on consent (for example, services that rely on geolocation, such as personalized promotional offers or roadside assistance). When possible (based on the type of Connected Service at issues), we aim to provide you with the ability to adjust the type of information collected to the requested level.

9. Minors' Personal Information

We do not knowingly collect personal information about any person under 18 years of age unless such personal information is provided to us through the consent of the minor's parent(s) or legal guardian(s). Otherwise, under no circumstance, should a minor or his or her parent or legal guardian submit a minor's personal information to us for any reason whatsoever.

10. How Long We Store Personal Information

We retain your personal information to provide you with North Charge Inc. Products, for as long as it is needed to meet the relevant purposes described herein, as may be required by law (including for tax and accounting purposes), or as otherwise disclosed to you. How long we keep



certain personal information will be different based on the purpose of its use, and we must comply with applicable laws when deleting your personal information.

We undertake to delete, or, where permitted, anonymize your personal information as soon as the purpose and/or the duration of their established retention expires, except where further storage is necessary in the individual case to comply with our legal obligations (such as specific data retention obligations) or to establish, exercise or defend our legal claims.

The maximum retention periods set out in the table below apply unless you request for your personal information to be erased before the expiry of these periods, in accordance with your rights under applicable laws.

Category	Retention period
Cookies and other tracers	Please see our cookies manager for applicable retention periods.
Information relating to financial transactions carried out by credit card	This information is processed by our payment service providers and is retained according to the service provider's privacy policy.
Information about North Charge Inc. Products performed, ordered and/or purchased	For a period not to exceed 15 years from the end of our commercial relationship.
Personal information processed as part of solicitations and promotional operations, sending offers and news	For the duration of our commercial relationship, then for 3 years after the end of this relationship or of the last contact you initiated. 3 years in other cases, from the last contact you initiated.
Creation of a customer account, its configuration and management of your profile	Your personal information will be kept until you delete your account.
Personal information relating to the management of requests for the exercise of rights and questions on personal information	Your data will be kept for one or 6 years depending on the right exercised or as permitted by law in the applicable jurisdiction.



<p>Information about managing customer service interactions and responses to any customer surveys</p>	<p>For a period not to exceed 15 years from the end of our commercial relationship.</p>
<p>Geolocation data</p>	<p>For a period not to exceed 15 years from the end of our commercial relationship.</p>
<p>Management of your complaints and questions initiated by contacting our customer service.</p>	<p>For a period not to exceed 15 years from the end of our commercial relationship. At the end of the said relationship, only the data necessary for pre-litigation or litigation purposes will be archived until the acquisition of the legal statute of limitation. In the event of a litigation procedure, the data will be kept for the duration of the procedure and until the expiration of ordinary and extraordinary remedies.</p>
<p>North Charge Inc. APP managing data processing data related to charging, detect and proactively fix functionality issues, address customer complaints, and to prevent unauthorized access or misuse, certain general usage information associated with your account or VIN may be shared with us.</p>	<p>For a period not to exceed 15 years from the end of our commercial relationship.</p>

- In general, we retain your personal information for as long as it is necessary for the purposes for which it was collected.
- In order to determine the appropriate retention period for personal information, we take into account a number of criteria including the quantity, type and sensitivity of the personal information, the risk of damage due to unauthorized use or disclosure of your personal information, the purposes for which we process your personal information.

North Charge Inc. is subject to various retention and documentation obligations from applicable laws and statutory limitation periods. The period for retention and documentation specified in applicable regulations may vary from two to fifteen years.



11. Contact Us

Our Data Protection Officer is also your contact person for all matters relating to data protection and the exercise of your rights. We will respond to your request in writing within one month of receipt of such a request. We may extend this period by an additional two months, if necessary, given the complexity and number of requests. We will inform you within one month of receiving your request for the extension of the deadline, as well as the reasons for the delay. If you submit the application electronically, then you will be notified electronically, if possible, unless otherwise stated. If you are not satisfied with our response, you may lodge a complaint with your local data protection authority, for more information, please

visit: <https://www.priv.gc.ca/en/about-the-opc/what-we-do/provincial-and-territorial-collaboration/provincial-and-territorial-privacy-laws-and-oversight/>.

Please direct your requests or questions to North Charge Inc. Data Protection Officer via DSR Form, <https://www.northcharge.ca/contact>

Email: info@northcharge.ca

12. Changes to this Privacy Policy

North Charge Inc. keeps its privacy policies under regular review. Modifications and/or amendments will be posted on our website, and we will send notice of significant changes to individuals with whom we have a relationship who may be impacted by the change. Changes to our Privacy Policy shall be effective immediately upon North Charge Inc. posting the updates on our website.