

## **Privacy Policy**

FreshSpoke is a software platform that provides online tools that promote and enable online wholesale of local food. It is made up of a mobile application on iOS and Android, a public web site and a series of licensed API's. All three are part of a family of social applications, which is owned and operated by FreshSpoke Inc. but are commonly referred to as FreshSpoke throughout this document. More details about FreshSpoke Inc. can be found below under "About Us".

FreshSpoke understands the sensitivity with which your personal identifying information should be handled, so we have taken the steps necessary to ensure it is safeguarded at an optimal level. After all, providing information online involves a great deal of trust on your part and we want to earn your trust!

### **Part One: Privacy Principles**

Like other reputable corporations, FreshSpoke Inc. has adopted a set of privacy principles as set out in the National Standard of Canada. These principles govern our privacy practices, as they pertain to your personal identifying information and how we conduct business. They are:

#### **Accountability**

FreshSpoke Inc. is responsible for personal information under its control and shall designate an individual as the Company's Privacy Officer as the individual responsible for the Company's compliance with the Personal Information and Electronic Documents Act.

#### **Identifying Purposes**

The Company shall identify the purposes for which personal information is collected at or before the time the information is collected.

#### **Consent**

The knowledge and consent of an individual is required for the collection, use or disclosure of personal information, except where inappropriate. Consent shall be obtained, either verbally or in writing.

#### **Limiting Collection**

The collection of personal information shall be limited to that which is necessary for the purposes identified by the Company. Information shall be collected by fair and lawful means.

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

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### **Accuracy**

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### **Safeguards**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

### **Openness**

The Company shall make readily available to individuals specific information about its policies and practices, relating to the management of personal information.

### **Individual Access**

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as is appropriate.

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### **Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the Company's compliance.

## **Part 2: Privacy Policy**

Before submitting your personal information on any of FreshSpoke's platforms, please read this Policy carefully, to learn about our privacy practices. If you do not agree to the terms of this Privacy Policy you should discontinue your use of this Site and/or not provide us with any Personal Identifying Information.

### **i) The Information We Collect**

Use FreshSpoke anonymously: FreshSpoke does not collect any "Personal Identifying Information" about you unless you have provided it to us. You can browse the public web site, perform course searches and read content contributed by members of FreshSpoke without providing any personal information. Our servers do collect information about your visit but none of the information identifies you in any way.

Use FreshSpoke as a member: In order to use some of FreshSpoke's tools, enter contests and sweepstakes, contribute content to the site and/or share content with others, you are required to create a FreshSpoke account. When creating an account, we only collect what is absolutely necessary in order to provide you with a rewarding experience. Information includes your email address, screen name, town/city and province/state.

When creating an FreshSpoke account on freshspoke.com or mobile, you may choose to register for an account with us or take advantage of our integration with Facebook and Twitter. The information we have access to on these sites, is controlled under your Privacy Settings on these sites, respectively and may include your name, email address, gender, age range, geo location, friends/followers list.

If at anytime you wish to disconnect these accounts from FreshSpoke, all postings from FreshSpoke to these social media platforms will stop. However, if you have friends that use FreshSpoke, they may also have shared information about you with us. If you wish to prevent that sharing, you can do so by editing your privacy settings on these social media sites.

## **ii) Content Shared**

FreshSpoke is a collaborative community and as such we encourage the sharing of information and the contribution of content from our members. When you post pictures, comment, ratings and/or reviews, the content is public. As such, anyone in the public can see any content and information you have chosen to include, so we encourage you to always think carefully before including any personal information in your posts.

We also collect anonymous information, such as your IP address, the type of browser you use, the pages on our Site that you visit, the search terms that you enter and the advertisements that you click. This information is used to provide features and help us diagnose problems, administer the Site and otherwise improve our service to you.

## **iii) Cookies and Other Technologies**

Your browser has "cookies" which, if you allow their use, store small amounts of data on your computer when you visit a web site. Cookies do not contain any personally identifying information about you and therefore cannot be used to identify you personally. Cookies simply assist us in tracking which of our features you like best.

Cookies also enable us to customize our content according to your preferences. You can choose whether to accept cookies by changing the settings of your browser. You can reset your browser to refuse all cookies or to allow your browser to show you when a cookie is sent. However, if you choose not to accept cookies some parts of the Site may not function properly.

#### **iv) How we use your information**

FreshSpoke uses the information we collect from you at sign – up, along with the content you populate to your member profile, in order to facilitate your access to and use of our platforms; to communicate with you; to publish your ratings and reviews; to keep track of your activity in order to give you greater status; connect you with followers and friends on FreshSpoke and your connected social media platforms; to respond to your questions and comments; to measure interest in and improve our platforms, tools, products, services and Web site; to notify you about special offers or services available from us or our partners that may be of interest to you; to customize your experience and deliver targeted content; to solicit information from you, including through surveys; to resolve disputes or troubleshoot problems; to prevent potentially prohibited or illegal activities; to enforce our Terms of Use; and as otherwise described to you at the point of collection.

#### **v) With whom we share your information**

FreshSpoke is extremely vigilant about who has access to information. As part of our day-to-day operations it is necessary – even beneficial - to share information with other sites and vendors. FreshSpoke routinely shares information with the following:

**Social Media Sites:** We give you the ability to access specific, reputable third party social media web sites and services through our site. When you do so, you are sharing information with those sites, and as such the information you share will be governed by their privacy policies. You may also be able to modify your privacy settings with these third party social media web sites.

**Allied Business Partners:** FreshSpoke routinely forges strategic alliances and partnerships in order to provide or enhance a particular tool or service we provide. You can tell when a third party is involved in a tool or service because their name will appear, either with ours or separately. You may also be referred to FreshSpoke from their web sites.

We may share your registration information, such as your name, email address, mailing address, telephone number and preferences (where applicable), about you with our Allied Business Partners. They have their own policies around the use of your personal information and we encourage you to review the privacy policies before sharing your personal information with an Allied Business Partner.

**Third-party contractors:** FreshSpoke engages third party businesses to perform specific functions including, but not limited to business analytics; e-commerce and fraud prevention; marketing, promotions and advertising; and business consulting. We may also authorize third-party vendors to collect information on our behalf. Third-party vendors have access to and may collect information only, as needed, in order to perform their functions. They are not permitted to share or use the information for any other purpose.

FreshSpoke will comply and share information in relation to a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy; take action regarding illegal or suspected illegal activities; all subpoenas, court orders, or other legal process; to establish or exercise our legal rights; defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.

Other than as set out above, you will be notified when personal information about you will be shared with third parties, so you have an opportunity to choose not to have us share such information.

We also share aggregate and share anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors our Web site receives or the most popular hotels and vacation destinations. This information does not contain any personal information and is used to develop content and services we hope you will find of interest.

#### **vi) How we protect your personal & financial information**

We want you to use FreshSpoke with confidence. We maintain security measures that protect against the loss, misuse and alteration of the personal information under our control. We take reasonable precautions to ensure that data stored in our system is secure and that only authorized employees have access to your personal information for an intended purpose.

FreshSpoke use 256-bit encryption along with 2048-bit root certificates which offers the most secure encryption available when transmitting sensitive information between our server and your system. We employ firewalls and sophisticated detection software to prevent unauthorized parties from gaining access to our system and consequently your information.

FreshSpoke DOES NOT copy or store any personal financial information on our servers or files. All transactions are processed through our e-commerce gateway provider, [Stripe](#). For more information on their privacy and security practices and principles, read their [Privacy Policy](#).

#### **vii) How to access your information**

FreshSpoke gives you access to a console on our public web site and mobile app, on which you can modify, correct or remove your Personal Identifying Information at any time.

If, at any time, you wish to have your personal information removed from our database; wish to opt out of receiving any particular communication; and/or, wish to change and/or correct any information previously provided, you have two options: 1. You may make the necessary notation, removal, change and/or correction yourself by accessing About Me after signing in; or 2. [contact us](#) and we will make the necessary notation, removal, change and/or correction on your behalf.

It is important to note that if you can access FreshSpoke through your mobile device, removing the application does not remove your account from FreshSpoke's database. You must remove it on [eieieat.com](http://eieieat.com), using one of the options specified above.

### **viii) External links**

FreshSpoke features a series of links to other web sites. Please be aware that FreshSpoke is not responsible for the privacy practices of other sites. We encourage you to read the privacy statements of each and every web site that collects personally identifying information before disclosing any information.

### **ix) Changes to our Privacy Policy**

We will periodically review the appropriateness of this Privacy Policy and may make, in our discretion, such changes as are necessary. If we decide to change this Privacy Policy, we will place a notice on our web site adjacent to the Privacy Policy tab or send a notice of change by email. Rest assured that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone.

### **x) How you can contact us**

If you have questions about the privacy and security practices of FreshSpoke, you may email us at anytime at [info@freshspoke.com](mailto:info@freshspoke.com), call 844.48.FRESH (37374) or write to us at the address below:

Privacy Officer

FreshSpoke

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