

POLARIS RENEWABLE ENERGY INC.: PRIVACY NOTICE

Last updated: February 7, 2023

Polaris Renewable Energy Inc. (“Polaris”, “we”, “us”, “our”) is committed to protecting the privacy of visitors to its website <https://polarisrei.com/> (the “Site”), as well as potential investors and individuals applying for employment with Polaris. Polaris makes every effort to ensure that these individuals understand the nature, purposes and consequences of the collection, use, and disclosure of their personal information, which we explain in this Privacy Notice.

For the purposes of this Privacy Notice, “personal information” means any information that can reasonably be used, either alone or in combination with other information, to identify an individual. However, it excludes information that is used for the purpose of communicating with an individual in relation to their employment, business or profession such as their name, position name or title, work address, work telephone number, work fax number or work email address. Accordingly, investor contact information that falls within this category would not be considered “personal information.”

1. When does this Privacy Notice apply?

This Privacy Notice explains how we collect, use, and disclose your personal information anytime you interact with the Site or otherwise communicate or interact with us. It also applies when you apply for employment with us.

2. What personal information does Polaris collect and how does it collect it?

We collect personal information from you when you provide information directly to us, for example, when you contact us or make inquiries of us. In these cases, we may collect your name, mailing address, email address and telephone number. We may also collect personal information you provide to us during those communications, such as the content of your comments, feedback or inquiries.

We may automatically collect certain technical information from any device that you use to access the Site or interact with us online. This may include:

- Your device information, including IP address, device model & manufacturer, web browser type and version, hardware model, time zone setting, browser plug-in types and versions, and operating system version, as well as your internet service provider; and
- Information about how you use the Site, including the uniform resource locators (“URLs”) of other websites that you click to and from our Site (including the date and time clicked), page response times, download errors, length of visits to certain pages on the Site, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the Site.

Please see ‘Automated Collection’ below for more information.

If you apply for employment with us, we may also collect:

- Information about your education, employment and educational history, and qualifications, such as the contents of your resume or CV; and
- The result of criminal record or background checks.

3. **Why does Polaris collect my personal information?**

We may collect your personal information and use it to:

- Communicate with you about our company and its activities;
- To manage our relationship with you as an investor;
- Present the Site and its contents to you;
- Better understand how visitors interact with our Site, and improve the Site;
- Detect and prevent security threats to the Site;
- Evaluate and process your application for employment; and
- Otherwise act as required or as authorized by law

4. **Automated Collection**

We may use technologies such as cookies to automatically collect certain information about visitors to the Site. A “cookie” is a unique numeric code that we transfer to your computer that identifies your browser to our server when you visit the Site. We use cookies to recognize you as a return visitor to the Site and save any information you have may entered into a form, as well as to save your screen display choices. You can set your Internet browser settings to stop accepting new cookies, to receive notice when you receive a new cookie, or to disable existing cookies. Note that the opt-out will apply only to the browser that you are using when you decide to opt out of cookies. Without cookies though, the features described here will not function properly. Any cookie sent to your computer by Polaris in connection with your use of the Site does not give us access to your computer.

5. **How and why does Polaris share my personal information?**

In some cases, we transfer your personal information to third parties who provide their services to us. In these cases, Polaris remains accountable for the personal information. For instance, to fulfill the purposes described above at Section 3 of this Privacy Notice, ‘**Why does Polaris collect my personal information?**’ we need to share your personal information with the following types of third-party service providers:

- Cloud hosting, database and software providers who help us host, administer, maintain and operationalize our information systems, which include our broker management and customer relationship management systems, our telephony systems and the Site.

When we allow a third-party service provider to access your personal information, we only allow them to do so for the sole purpose of carrying out the above services on our behalf. In our service agreements with these service providers, we require them to treat your personal information as securely as we do.

In certain narrow circumstances, the law permits us to disclose your personal information without your consent. For instance, we may disclose your personal information to government, regulatory or law enforcement agencies as requested by these agencies, if we have a good faith belief that the disclosure is required or permitted by law. We may also disclose your personal information in order to enforce our legal rights; to detect, prevent or address fraud or security issues; in connection with a court or regulatory proceeding; and to enforce ours or others' legal rights, property, or safety.

We may also transfer or assign your personal information to third parties because of, or in connection with, a sale, merger, consolidation, change in control, transfer of assets, reorganization, or liquidation.

We do not trade, rent or sell your personal information.

6. How does Polaris keep my personal information safe?

Polaris uses reasonable technical, organizational and administrative measures to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

We restrict access to your personal information to only those Polaris employees, contractors and agents who require that information to carry out the purposes identified above at Section 3 of this Privacy Notice, **'Why does Polaris collect my personal information?'** Anyone with access to your personal information is subject to strict confidentiality obligations. However, you should be aware that no safeguard is 100% secure, and despite our best efforts, we cannot guarantee that your information will be secure, particularly while it is in transit over the Internet.

We only retain your personal information for as long as necessary to fulfill the purposes described in Section 3 of this Privacy Notice, **'Why does Polaris collect my personal information?'** or as otherwise required by applicable law. For Polaris's home inspection clients, we keep reports for a minimum of seven years, unless you request otherwise.

One or more of our service providers or affiliates, as well as our platform, are located in the United States. This means that your personal information may be transferred to, stored, or processed in the United States, and may be accessible to regulatory authorities in accordance with the laws of the United States.

7. What rights do I have over my personal information?

At any time, you may withdraw your consent for us to collect, use or disclose your personal information. However, this may affect our ability to offer you some of our products, services and/or benefits.

At your written request, we will let you know what information Polaris has about you, what it is being used for, and with whom it has been shared. If you notice any inaccuracies or wish to update any of your personal information, we will make those changes if you request us to do so. If we disagree with your request, we will note that.

At your written request, we will also provide you with access to your personal information that is in our control, subject to certain exceptions. These include where:

- Personal information about another person might be revealed and the other person's personal information cannot be separated from yours;
- Commercially confidential information might be revealed and the confidential information cannot be severed from yours;
- The requested information is subject to solicitor and client privilege;
- Someone's life or security might be threatened as a result of giving you access and the personal information about the other person cannot be separated from yours; and
- The information was collected for purposes related to an investigation of a breach of an agreement or contravention of the law.

The way in which we will give you access to your personal information may vary, depending on the format in which we hold it and the amount of information. We may provide your information in physical or electronic format. In the case of an exceptionally large file, we may provide you a summary of the personal information.

To make a request to withdraw your consent, or access or correct your personal information, contact us at info@PolarisREI.com.

8. CONTACT US

If you have any questions or concerns about this Privacy Notice, you can contact Polaris' *VP, Financial Transformation & Governance*:

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