# **Privacy Policy**

At Taiga Motors Inc. ("**Taiga**" or "**we**"), we firmly believe in transparency with respect to how we collect, use and disclose your personal data. This Privacy Policy contains information about this, as well as your rights.

This Privacy Policy describes how Taiga processes personal data when you use our website <a href="https://taigamotors.com">https://taigamotors.com</a> (the "Website"), including when you reserve or use our products, make purchases, apply for employment opportunities, fill out applications or forms, or make inquiries. This Privacy Policy also covers your interactions with us, whether it is when you use our vehicles or our mobile application, when we communicate with you, how your register to our events, and our marketing activities (together our "Services"). This Privacy Policy does not describe the types of cookies and tracking technologies that we use. If you would like more information about this, please consult our <a href="Cookie Policy">Cookie Policy</a>.

If you have any questions, concerns or inquiries regarding the processing of your personal data or this Privacy Policy, do not hesitate to reach out to us. Below you will find the information needed to contact us either by email at DPO@taigamotors.ca or by mail at:

Taiga Motors Inc. - Attn: Data Protection Officer

480 Lafleur Avenue

Lasalle

Québec H8R 3H9

Canada

If you are in a jurisdiction which puts forward the notion of data controller (such as the European Union), we are the data controller of the personal data collected through our Services.

## 1. WHAT DO WE CONSIDER AS PERSONAL DATA?

We consider as personal data any information which relates to an identified or identifiable natural person, such as an identification number and location data. We include in our definition of personal data the cookies and tracking technologies that we used, as described in our Cookie Policy, you may refer to this document for more specific information on practices regarding cookies. Depending on where you are located, some of the personal data that we refer to in this Privacy Policy may not be considered personal data under the laws that apply to you.

### 2. WHEN DOES THIS PRIVACY POLICY NOT APPLY?

If you click-through to links to third parties' websites, applications, or services from our Services, this Privacy Policy does not apply to the processing of personal data by these external services. It is always a good idea to read their privacy policies to better understand what they do with your personal data. This Privacy Policy does not describe how our products will process users' personal data for the moment – subsequent changes will be made to reflect our practices.

# 3. WHAT TYPE OF PERSONAL DATA DO WE COLLECT, AND WHY?

As part of the Services, we collect the personal data described in the table below. The table also provides you with information on the purpose of our collection and the legal basis for the collection of personal data is identified. Such legal basis may not be applicable in your jurisdiction.

If we process your personal data based on your consent, you can always withdraw such consent by sending an email at info@taigamotors.ca or through the functionalities that we make available to you.

We collect personal information directly from you. We also use third-party service providers which may request additional information from you. For example, we use Stripe (for vehicle reservations) and Shopify (for merchandise and apparel) as third-party payment processor and as part of their financial compliance activities, they may obtain personal information about you, such as date of birth and government issued IDs.

SITUATIONS WHERE WE COLLECT PERSONAL DATA FROM YOU	EXAMPLES OF PERSONAL DATA	PURPOSES AND EXAMPLES OF USE	LEGAL BASIS
Whenever you visit our Website	IP address Device type Operating system Internet browser type Time spent on the Services Pages visited Links clicked Language preference Pages that led or referred you to the Website	This data is collected automatically through our Services for various reasons, including to have them function effectively, to fix bugs or to improve the security of our Website.  We collect usage and performance data for analytics purposes, to help us know more about your use of the Website and to improve it. This information is collected through analytic cookies that are anonymized unless we obtain consent from you for additional information. Please see our Cookie Policy for more details.	Legitimate interests
When you communicate with Taiga through the Website or social media.	First and last names Email address Country Content of communications	Our Website contains forms to communicate with us, as well as emails and social media accounts which can be used to reach out to us. When you do so, we may ask for identification data such as your first and last names, and we will collect any other information which is included in your inquiry.	Consent
When you purchase a Taiga vehicle or require maintenance and repairs.	First and last names Delivery location address Email address Specifications of the Taiga vehicle (Model, year, serial	We need to collect certain information to organize the delivery of your vehicle and coordinate maintenance and support operations if you	Pursuant to a Sale or Service Agreement Legitimate Interest

	number, warranty plan) Other information you shared in the context of these services.	experience issues with your vehicle, including if you want to purchase pieces and accessories, or require warranty work to be performed.	
When you use a Taiga vehicle.	Geographical location Wi-Fi IP Address Vehicle Display Name Wi-Fi Connection Strength Vehicle Identification Number or Hull Identification Number Vehicle State of Charge LTE Connectivity Status Statistical and Performance information about use of the vehicle (such as speed and battery use)	Our vehicles are connected and data is collected when you use them. We collect such data to improve vehicle performance and customer experience, allow Taiga to provide adequate and timely support for the vehicles and drive research and development initiatives. Taiga may be legally compelled to share such data with law enforcement bodies or other third parties (such as insurers). Taiga will inform you about such disclosure if possible.  Location data is accessed where there is a need-to-know (such as in case of accident, support calls or when you consent to it). Aggregated location data may be used for Taiga's research and development activities and internal business purposes, including planning purposes (such as the deployment of our charging network).	Legitimate interest Pursuant to a Sale Agreement Consent
When you interact with Taiga in order to be a Taiga Service Provider (i.e. third parties that provide certain vehicle-related services).	First and last names Position Company Address Country City Zip code Email Phone and mobile numbers Whether you operate your business	If you would like to become a Taiga Service Provider, we will ask that you share specific information about you, such as contact information.	Consent

When we send marketing	Consent	If you accept to receive our	Consent
communications.	Email address	newsletter or marketing communications, we will ask for your opt-in consent and email address. Please note that you can optout from receiving our	
		marketing communications. You can do so by clicking the "unsubscribe" link at the bottom of the emails you receive from us. You can also contact us directly to do so. Note that unsubscribing applies to newsletters or marketing communications do not prevent us from contacting you for pre-orders or in response to queries or forms you make. Please consult this Privacy Policy attentively – Taiga may contact you directly in cases other than through general marketing communications.	
When you attend an event by Taiga or sign up for a demo.	First and last names Email address Phone number Time slot reserved and event information	If you register to one of our events or sign up for a demo, we will collect certain personal information, including to confirm your attendance, reserve your place, send you reminders and write you in connection with the event or demo (e.g. to obtain feedback on your participation).	Consent
Whenever you make a payment transaction on our Website.	Payment information Country Zip code First and last names Email address Phone number Country, Zip code Model and number of units ordered Payment method, amount of deposit, date of deposit	If you decide to pre-order our products or transact with us, you will have to complete a form and be asked to provide your credit card information to Stripe or Shopify. We use Stripe or Shopify to process your credit card information. Apart from the last 4 digits of your credit card number, we cannot view your credit card information.	Performance of an agreement (such as the pre-order agreement or the purchase of merchandise and apparel) Legitimate interests and compliance with applicable laws

		Third-party payment solutions providers also use personal information to conduct fraud monitoring, prevention and financial compliance activities.	
When your purchase items and organize delivery.	First and last names Email address Billing Address Shipping Address Phone number Country, Zip code Products purchased Payment method, amount of purchase, date of transaction	When you purchase on our online store, we require you to complete a form on our Website to make an order, arrange payment and shipping details. Once the transaction has been successfully completed, we will receive the confirmation with the date of transaction and the amount.	Sale contract
When you apply for a job posting	Identification information Background information about your career and education Resume and cover letter Eligibility to work in Canada ID numbers	From time to time, we have job openings that may be tempting to you! If you decide to apply, we will ask for identification information and background information about your career. We may also contact you for future opportunities if the one you applied for does not work out – you can opt out by letting us know if you do not wish to be contacted for future roles. If your application is retained, we will require additional information to identify you and undertake professional and criminal background checks.	Consent
When we connect or interact online	Publicly available information on your social media profiles and other personal pages, such as Instagram, Facebook and YouTube, LinkedIn, or TikTok.	If you follow us or interact with us online, we may process your personal data in order to exchange with you and respond to your inquiries. If you participate in a contest online, we process your personal data to run the contest.	Legitimate Interests Consent (for direct messages)

# 4. WHERE DO WE COLLECT, USE AND DISCLOSE YOUR PERSONAL DATA?

Your personal data may be stored on servers located in a country other than where you reside. Where possible, Taiga

makes efforts to host personal data in Canada. In certain cases, we host personal data in the United States, including through our use of Amazon Web Services. We also use third party service providers in other countries, and they may process your data in those countries. Those countries may not have the same data protection laws as the country in which you initially provided that information, or of your nationality. Before transferring personal data to third parties, we take commercially reasonable measures to ensure that adequate safeguards are in place, such as by entering into agreements with such third parties that incorporate standard contractual clauses or other legally acceptable transfer mechanism.

#### 5. HOW DO WE PROTECT YOUR PERSONAL DATA?

We use reasonable organizational, technical, and administrative measures to protect information within our organization.

We make commercially reasonable efforts to use service providers that have appropriate security safeguards in place. For instance, we use Amazon Web Services, which maintains several independent verifications of its security, privacy and compliance control including ISO/IEC 27001:2013, 27017:2015, 27018: 2019, 9001:2015. You can review Amazon Web Services' safeguards <a href="here">here</a>.

We use Stripe to process credit card data for pre-orders. Stripe maintains several security safeguards and is certified as <u>a PCI Level 1 Service Provider</u>. This is the most stringent level of certification available in the payments industry. You can read more about Stripe's security policies <u>here</u>. We also use Shopify Payments to process payment data for non-vehicle sales, such as for accessories and merchandise. Shopify Payments maintains security safeguards and holds PCI-DSS compliance certification. Shopify Payment also undertakes SOC 2 Type II and SOC 3 audits. You can read more about Shopify's safeguards and consult their compliance reports <u>here</u>.

However, no data transmission or storage system is guaranteed to be 100% secure. You also need to do your part, such as by using secure networks, especially when making a payment.

### 6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain personal information for as long as necessary to provide you with the Services or as required by applicable laws, whichever is longer.

# 7. WITH WHICH CATEGORIES OF RECIPIENTS DO WE SHARE PERSONAL DATA?

We do not sell your personal data. We disclose your personal data as required to provide you with the Services. Here are the categories of recipients with whom we share personal information, as well as examples of third-party service providers involved:

# IT Service Providers

We use service providers to provide and host our Services online, as well as to enable other functionalities. For example:

We use Fabric as our commerce and order management tool. You can consult their privacy policy <a href="https://example.com/here">here</a>.

We use Ironclad as a contract management tool. You can consult their privacy policy <a href="here">here</a>. We use Amazon Web Services to host data from our Services (including data about vehicle use). You can consult their privacy policy <a href="here">here</a>.

We use WP Engine as a hosting service provider. You can consult WP Engine's privacy policy here.

We use Zapier as an automation platform. You can consult Zapier's privacy policy here.

	We use Shopify to power e-commerce operations, mainly for non-vehicle sales. You can consult their privacy policy <a href="here">here</a> .  We use Infor (LN) as our enterprise resource planning software, which we use namely to process your orders. You can consult their privacy policy <a href="here">here</a> .  We use Microsoft Office for our business operations. You can consult Microsoft's privacy policy <a href="here">here</a> .
Email Providers	We use Mailchimp to send you communications by email. You can consult Mailchimp's privacy policy <a href="here">here</a> .
Scheduling Platform	We use Calendly to schedule events and send reminders about them. You can consult their privacy policy <a href="here">here</a> .
Analytics and Performance Providers	We use third-party service providers to monitor and analyze the use of our Services.  Notably, we use Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Services. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.  You can consult their privacy policy <a href="here">here</a> .  We use Salescycle to optimize our website and improve our interactions with visitors and customers. You can consult their privacy policy <a href="here">here</a> .  We use IP Stack to present relevant content to our website visitors. You can consult IP Stack's privacy policy <a href="here">here</a> .  Vehicle connectivity via cellular telecommunications networks is made available by Digi International Inc. You can consult their privacy policy <a href="here">here</a> .
Online Interactions	When you interact with our social media accounts, data about you may be shared with the social media providers. When you share our content through the social media handles on our Website, we are joint-controllers with these social media platforms, and they may use your personal data for other purposes, please consult their privacy policies below:  LinkedIn Facebook Instagram TikTok Youtube Twitter
Payment Providers	We use payment providers to allow for credit card payments through the Website, including Stripe and Shopify Payments. You can read Stripe's privacy policy <a href="here">here</a> and Shopify Payments privacy policy <a href="here">here</a> .
Human Resources Service Providers	We use Workable to manage job applications and the recruitment process. You can read Workable's privacy policy <a href="https://example.com/here">here</a> .  We use BambooHR and Ceridian to manage our human resources operations. You can consult BambooHR' General Privacy Notice <a href="here">here</a> and Ceridian's privacy policy <a href="here">here</a> .  We use Certn to perform background checks on successful applicants before hiring. You can read Certn's privacy policy <a href="here">here</a> .

E-commerce activities	Taiga strives to conduct most of its commercial activities digitally. To do so, Taiga relies on different service providers.  Certain of our e-commerce operations are powered using Shopify, mainly non-vehicle sales. You can consult Shopify's privacy policy for customers here, and its general privacy policy <a href="here">here</a> .  Canada Post is responsible for delivery of merchandise and accessories. You can read Canada Post's privacy policy <a href="here">here</a> .
Customer Relations Management Providers	We use Salesforce to manage our relationships with external parties, including with our customers, partners and people who write to us. You can consult Salesforce's privacy policy <a href="here">here</a> .
Law Enforcement and Other Authorities	We may receive requests from law enforcement or the authorities to access personal data.  Whenever permitted by law, we advise our users or clients before responding to such requests. We also validate that the request is legitimate before responding.
Taiga Service Providers and Carriers	Taiga relies on Taiga Service Providers to execute deliveries and provide support to its customers. We will share personal data with them to help them help you better. We will also disclose some of your personal data to the carrier responsible of the delivery of your vehicle to the chosen Taiga Service Provider's location.
Business Transaction	We may disclose your personal data in connection with, or during negotiations of, any merger, sale of assets, financing, or acquisition of all or a portion of our business by another entity or investors. For instance, if we sell our assets, your personal data may be part of such assets.

# 8. HOW CAN USERS EXERCISE THEIR RIGHTS REGARDING THEIR PERSONAL DATA?

Depending on where you are located, different rights are granted to you so that you can control how we process your personal data. These rights generally include the rights to access and rectify personal data. In certain jurisdictions additional rights include:

- The right to be informed about how we process your personal data;
- The right to request the erasure of your personal data;
- The right to revoke your consent when our processing is based on your consent;
- The right to object to the processing of your personal data;
- The right to restrict the processing of your personal data;
- The right to have automated decision making reviewed in accordance with the law;
- The right to the portability of your personal data;

Some of these rights may not be applicable, depending on the circumstances and jurisdiction. Typically, your country's data protection authority has information available online about your rights.

If you reach out to us to exercise your rights, we will respond to you within 30 days of receiving your request, or faster if required by applicable laws. In some cases, we may need additional information to validate your identity. We will only use this information for this purpose. If you do not agree with how we responded to your request, you have the right to lodge a complaint with your local authorities.

If you are located in Canada, the Officer of the Privacy Commissioner of Canada drafted this FAQ to help you access

your personal information when it is held by a business. You can also contact the Office of the Privacy Commissioner of Canada's Information Center:

#### Telephone

9:00 am to 4:00 pm EST Toll-free: 1-800-282-1376

Mailing address

Office of the Privacy Commissioner

30 Victoria Street Gatineau, Québec K1A 1H3

If you're not satisfied with how we process your request, you can <u>lodge a complaint</u> with the OPC, by filling out <u>this</u> form.

## 9. WILL THIS PRIVACY POLICY BE UPDATED?

Yes, we will update this Privacy Policy from time to time to reflect technological changes, new functionalities and new legislation. Please refer to the latest update date above to know when we last updated this Privacy Policy.

# 9. HOW DO YOU MANAGE COOKIES?

We have adopted the following Cookie Policy.