

Privacy Policy

Last updated: July, 2025

1000646268 Ontario Inc. d/b/a Atrium ("**Company**", "**we**", "**our**", or "**us**") respect your privacy and are committed to protecting it through our compliance with this policy. This policy applies when you access or use our website, platform (app.withatrium.com), or other services that link to this policy ("**Services**") and our practices for using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect:

- i. Through the Services.
- ii. In communications, including email, text, chat, and other electronic messages, between you and the Services.
- iii. When you interact with our experts through the Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we treat it. You agree to the collection, use, and sharing of your information as described in this privacy, subject to any rights or consents required by applicable law.. This policy may change from time to time. Your continued use of the Services after we make changes as described here is deemed to be acceptance of those changes, so please check the policy periodically for updates.

1. The Personal Data That We Collect or Process

"**Personal data**" is information that identifies, relates to, or describes, directly or indirectly, you as an individual, such as your name, email address, telephone number, or payment information or any other identifier we may use to contact you online or offline.

The types and categories of personal data we collect or process include:

- i. Account and contact information, including name, work address, email address, phone number, username, and other contact information you provide us.
- ii. Account history, including information about your subscription, account, transactions, purchases, order history, or discounts.
- iii. Location information, including general geographic location such as country, state or province, or city, if you have enabled and consented to location information collection.
- iv. Device information, including your IP address, device identifiers, operating system and version, and other device information.
- v. Content and information you elect to provide as part of your profile or in any reviews you make through the Services or emails, chats, or other communications sent to us.
- vi. Images, voice recordings, and videos collected or stored in connection with the Services, if you have consented to such information collection.

We also collect:

Statistics or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal data. For example, we may aggregate personal data to calculate the percentage of users accessing a specific Services feature.

Technical information. Technical information includes information about your internet connection and usage details about your interactions with the Services, such as clickstream information to, through, and from our Services (including date and time), products that you view or search for; page response times, download errors, length of your visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from a page.

If we combine or connect non-personal statistical or technical data with personal data so that it directly or indirectly identifies an individual, we treat the combined information as personal information.

2. How We Collect Your Personal and Other Data

You Provide Information to Us

We collect information about you when you interact with our Services, such as when you create or update an account, or schedule a call with one of our experts and any recordings or transcripts that transpire therefrom.

Automatically Through Our Services

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect information that may include personal data. Information collected automatically may include usage details, IP addresses, operating system, and browser type, and information collected through cookies.

3. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal data, to:

Provide you with the Services and any contents, features, information, products, or services that we make available through the Services.

Fulfill any other purpose for which you provide it.

Provide you with notices about your account, including expiration and renewal notices.

Improve our Services, including by analyzing your information and creating aggregated data derived from your information) to develop, maintain, analyze, improve, optimize, measure, and report on our Services and their features and how users interact with them. Our analysis may include the use of technologies such as machine learning and large language models. We do not use your personal data to train such models unless we have your explicit consent or it is permitted under applicable law.

Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.

Notify you when Services updates are available and about changes to any products or services we offer or provide through them.

In any other way we may describe when you provide the information.

For any other purpose with your consent.

4. Who We Disclose Your Information To

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may also disclose personal data that we collect or you provide as described in this privacy policy:

To our subsidiaries and affiliates.

To contractors, service providers, and other third parties we use to support our organization and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Atrium's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Atrium is among the assets transferred.

To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Services, we will transmit the contents of that email and your email address to the recipients.

For any other purpose disclosed by us when you provide the information.

With your consent.

We may also disclose your personal data:

To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

To enforce or apply our terms of use and other agreements, including for billing and collection purposes.

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our organization, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. Your Privacy Rights

Depending on your state of residency, you may have certain rights related to your personal data, including:

Access and Data Portability. You may confirm whether we process your personal data and access a copy of the personal data we process. To the extent feasible, data will be provided in a portable format. Depending on your state, you may have the right to receive additional information and it will be included in the response to your access request.

Correction. You may request that we correct inaccuracies in your personal data that we maintain, taking into account the information's nature and processing purpose.

Deletion. You may request that we delete personal data about you that we maintain, subject to certain exception under applicable law.

Opt Out of Using Personal Data for Targeted Advertising, Profiling, and Sales. You may request that we do not use your personal data for these purposes.

6. How We Protect Your Personal Data

While we use reasonable security measures to protect your data, no method of transmission or storage is completely secure. We encourage you to take steps to protect your personal information, especially when communicating online.

The safety and security of your information also depends on you. You are responsible for taking steps to protect your personal data against unauthorized use, disclosure, and access.

7. How We Retain Your Personal Data

We keep the categories of personal data described in this policy for as long as reasonably necessary to fulfill the purposes described or for as otherwise legally permitted or required, such as maintaining the Services, operating our organization, complying with our legal obligations, resolving disputes, and for safety, security, and fraud prevention. This means that we consider our legal and business obligations, potential risks of harm, and nature of the information when deciding how long to retain personal data. At the end of the retention period, personal data will be deleted, destroyed, or deidentified.

8. Changes to Our Privacy Policy

We may update this policy from time to time, and we will provide notice of any such changes to the policy as required by law. The date the privacy policy was last updated is identified at the top of the page. We will notify you of changes to this policy by updating the "last updated" date and posting the updated policy on the Services. We may email or otherwise communicate reminders about this policy, but you should check our Services periodically to see the current policy and any changes we have made to it.

9. Contact Information

To exercise your rights or ask questions or comment about this privacy policy or our privacy practices, contact us at:

mac@withatrium.com