

PRIVACY POLICY

Kahi (“**Kahi**”, “**we**” or “**us**”) provides a global asset-tracking platform through its hardware, related software, and the Kahi Website and Kahi Application. This privacy policy (“**Policy**”) sets out how Kahi collects, uses, discloses, retains, and disposes of personal data or personally identifiable information when Customer (“**you**”, “**your**”) use the Kahi Services or Website at <https://kahi.io> and <https://dashboard.kahi.io>. This Policy forms part of the Terms and Conditions that govern the provision of Services to Customer and the relationship between Kahi, Customer, and User. We encourage you to carefully review our Terms and Conditions <https://asesets.kahi.io/terms-and-conditions.pdf>.

Capital terms that are not defined here have the same meaning as set out in our Terms and Conditions.

Personal data or personal information or personally identifiable information (“**Personal Data**”) means information about an identifiable individual or natural person – that is, someone we can identify, directly or indirectly, using an identifier like a name, an identification number, location data, an online identifier, or someone we can identify using one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

While Customer Data may include your Personal Data or Personal Data belonging to someone who has provided you with the authority to upload to Kahi servers, this Policy does not address Customer Data. Customer Data is specifically dealt with under the Terms and Conditions or the agreement between you and Kahi when you Register for an Account to use the Kahi Application or Kahi Website services.

We are responsible for the personal information that we possess or control. We have internal policies and practices to protect personal information and have appointed a Privacy Officer to oversee privacy matters.

Consent

By Registering for our Services, you are providing your *meaningful consent* for us to control and process your Personal Data, or the Personal Data of those who have authorized you to share their Personal Data (“**Consent**”). Even though we strive to ensure that any information that comes through our systems is securely protected, you acknowledge that no security solution is completely impenetrable. This means your Personal Data, and information you decide to share with us or upload to our servers, may be exposed to unauthorized individuals in the event of a security breach. A security breach may create a *risk of significant harm* to you or to the owner of the Personal Data. For more information about meaningful consent or risk of significant harm, please visit <https://www.priv.gc.ca/en/privacy-topics/collecting-personal-information/consent/>.

We therefore strongly encourage you to read this Policy carefully and let us know if you have any concerns or questions by contacting us at privacy@kahi.io.

What Personal Data do we collect?

The types of Personal Data we collect about you or have access to include:

- First name;
- Last name;
- Business Email address;
- Phone number;
- Real-time geographical coordinate information that could be linked to an identifiable person or employee;
- IP address;
- Contact information (or contact information of an employee at your Kahi);
- Payment information (Account Subscription, purchase date, scheduled billing date, Subscription status, credit card or other bank information required for billing);

- Metadata linked to your asset, piece of equipment, vehicle, or other device to which Kahi's hardware is installed; and
- Other information that we require to provide our services to you.

If you have added other User Accounts that are affiliated with your Customer Account, we also collect their Personal Data, including their first name, last name, email address, phone number and metadata for calendar events.

If you are an employee or potential employee, we collect personal information including your name, address, telephone number, date of birth, social insurance number, banking information, benefit information, emergency contact information, CV and/or reference letters.

Kahi does not collect any sensitive personal data regarding health, finances or financial data, medical data, or any data relating to children. Customers are bound by Kahi Inc.'s Terms & Conditions at <https://asesets.kahi.io/terms-and-conditions.pdf>, and are prohibited under those terms from uploading any such data.

When Customers or Users login to use the Kahi Application, we also collect information about your Device, including your IP address, the type of operating system, and your login credentials.

When Customers and Users access our Website, we collect information about the browser you use; what pages you visit; and the links you click on through the Website. Other information we collect include normal website traffic, device ID, device usage, and geolocation (if it has been enabled by you).

We may also collect your Personal Data if you have made your Personal Data publicly available on the Internet or through any list or database we are authorized to use or see.

Limitation

We collect and retain personal information only for as long as we need to for the purpose outlined in this Privacy Policy, unless otherwise required by law. For instance, we are legally required to retain financial information for at least 6 years. We do not sell or otherwise distribute your personal information.

How do we collect your Personal Data?

When you Register for a Customer Account or User Account to use our Services, we require certain Personal Data to process your Account application. We also collect Personal Data every time Customer or User logs in to their respective Accounts, and accesses and uses our Application or Website. Lastly, we collect your Personal Data that is publicly available on the Internet which we have received either through third-party websites or marketing companies.

We may also collect your Personal Data through your use of the Services through our collection of real-time geolocation and Usage Data from the Kahi Hardware installed on your equipment, vehicles, or other assets. This data could be linked to the geographical locations and identities of your employees or other individuals who are operating your equipment, and may include Personal Data.

How will we use your Personal Data?

Kahi uses Personal Data to:

- communicate with Customers and Users in the context of providing technical support or responding to inquiries;
- communicate with Customers and Users respecting the use of the Services and other matters including but not limited to regulatory compliance, subscription and payment information, software or application functionality and updates, security and breaches;
- improve our services, software, applications, security, and evaluate how we are doing;
- conduct security checks, tests, audits, or system analyses;
- verify the identity of Customers or Users (where required);

- comply with our financial, reporting, and legal obligations;
- update you on changes to any of our policies, terms, and services;
- track how our Customers and Users use the Kahi Application and Website so that we can identify frequently used and preferred functions within the Kahi Platform and improve the Services we provide;
- complete transactions, collect fees, process payments, or provide receipts or reports to Customers and Users;
- to contact you and other individuals for market research, evaluating our services, or to update you on changes to our practices and procedures;
- to distribute publications or updates to our mailing list subscribers;
- to evaluate potential employees and determine eligibility, administer payroll or benefits, or contact emergency contacts;
- to develop and manage our operations;
- to detect and protect against error, fraud, theft, and other illegal activity; and
- As necessary to provide the Services required by the Customer.

If our reasons for collecting your Personal Data changes, we will let you know and request your consent for any new control or processing purpose.

Kahi collects data in the following formats:

- Raw data;
- Metadata;
- Text data;
- Image data (for example, pictures of your assets, facilities, or equipment); and
- Real-time geolocation data that is then processed and aggregated by Kahi to provide the Services.

Who is in Charge of the Data, and Who has Access?

The data we collect is available to the Chief Technology Officer (“CTO”), Marc Lennox, and is periodically made available to developers in order to triage software deficiencies or address faults in the software, Kahi Application, or Kahi Website.

Kahi periodically engages with independent contractor developers to develop software for the service. No Personal Data is made available to such contractors, and all software they develop is reviewed by the CTO to ensure that no unauthorized individuals have access to any personal information. All such contractors are provided with manufactured, fictional data from which to work in order to ensure privacy.

The Company may, from time to time and on a case-by-case basis, enter a business relationship with equipment manufacturers who are interested in using our Services. These manufacturers install our hardware onto their equipment and then sell that equipment to their consumers. As part of our Services, that equipment manufacturer will have access to data that is processed and aggregated by Kahi Inc. to remove all Personal Data and geographical coordinate information, and provide reports to the manufacturers containing this aggregated data. Through this process, the equipment manufacturers will not have access to any Personal Data or other data that could be linked to any identifiable person or employee.

The Company may also, from time to time and on a case-by-case basis, enter into an independent contractor relationship with complementary product providers (“Integration Partners”) in order to provide industry solutions that integrate data from multiple systems. For example, Kahi’s Services could enter into a relationship with an accounting application, invoicing application, and employment application to provide a business with a comprehensive Services package that automates several of their processes to increase efficiency. In such cases, the Integration Partner will be provided access to the data collected by Kahi to identify businesses and industries that could be interested in utilizing our integration solutions.

Third Party Services Providers

We run our entire platform using third-party cloud service providers, who may have access to Personal Data collected by Kahi. We also utilize other peripheral cloud services in order to assist in providing and monitoring the health of the Services (for example, collecting error logs, detecting faults, applications to facilitate the sending of e-mails to customers, etc.), and may from time-to-time engage the services of subcontractors for the purposes of developing the Services. We ensure that those providers, by contractual or other means, maintain comparable privacy protections and practices if they process your personal information. The third-party service providers we engage include:

- [Amazon AWS](#);
- [BalenaCloud](#);
- [Sentry](#);
- [Mailgun](#);
- [Sendwithus](#);
- [Skylight](#); and
- [Raven](#).

We strongly encourage you to review the privacy policies of our third-party service providers (links provided above). If we change the third-party service providers we engage, we will update our Policy and send you a notification.

Other Links

When you visit our Website, we sometimes include direct links to third party websites, like Twitter, LinkedIn, or Facebook. You acknowledge that Kahi does not have control over any of these links and the information you provide to those third-party websites.

How do we store and retain your Personal Data?

Storage

All information uploaded to the Kahi Application or sent to Kahi in connection with the Services is held on our Amazon AWS servers in Virginia. We generally do not keep any hard copies of Personal Data, and in the event that we have or have received hard copy documents containing Personal Data, we will destroy hard copies as soon as is feasible, subject to our legal obligations.

Retention

We retain information for as long as we are required by law to retain information. Once we no longer need the information for the purpose for which it was collected, we securely dispose of or de-identify any Personal Data, subject to our legal requirements and any written requests from you.

Your Consent

We will obtain your express consent to collect, use and disclose your personal information wherever possible and where required by law. If you provide personal information directly to us, we will assume you provided your consent for us to process your information for the purpose for which you provided your information. This applies where you have signed up for our services, downloaded our software, agreed to our Terms, engaged us by contract, or a representative has done so on your behalf.

We do not collect, use or disclose personal information without consent unless authorized or required by law to do so, such as in the following circumstances:

- when the information is *publicly available*, such as in public directories, registries or published information;
- if we are required to disclose personal information to a lawful authority;
- in an emergency that threatens someone's life, health or personal security;
- for security reasons; or
- as otherwise authorized by law.

We obtain electronic or oral consent from those who subscribe to our Website or who indicate an interest in receiving publications or communications from us.

Marketing

Kahi likes to send you information about our new products and services. Unless we already have a business relationship with you or you have offered your Personal Data to us separately, we will always ask you for your consent before sending you any commercial electronic messages.

By Registering for a Customer Account, you acknowledge that you are providing Kahi Inc. with your express consent and the authority to send you commercial electronic messages (defined under the Canadian Anti-Spam Legislation) with important announcements, event invitations, various marketing initiatives and promotions, or other relevant information.

You can opt-out of receiving any marketing messages from us at any time by contacting us at support@kahi.io. We will promptly add you to a do-not-send list and modify our records. You acknowledge that your name and contact information will be retained on our do-not-send list.

Kahi otherwise does not share or sell your Personal Data to any third parties for sales, marketing, survey, or other purposes.

What are your rights?

Subject to our legal obligations, you have the right to:

- request access to your Personal Data;
- request corrections to your Personal Data; and
- withdraw your Consent to our processing of your Personal Data.

If you are a 'consumer' from certain US states, you may also have the right to request that we erase your Personal Data, under certain restrictions; restrict or object to our processing of your Personal Data; or, request that we transfer your Personal Data to another organization or directly to you, under certain conditions.

To exercise any of the above rights, please contact us at support@kahi.io.

Cookies

Kahi tracks information using different types of cookies when you use our Website.

What are cookies?

A cookie is a small text file that the Website sends to your browser, which then stores the cookie on your hard drive to save your browsing preferences or measure website activity. We have implemented a pop-up window on our Website asking you to opt-in to our use of cookies.

We collect personal information using cookies on our Website. *Cookies* are small files placed on your digital assets or devices to track how you use the website. This helps us improve your user experience and save your preferences.

Some browsers can block cookies through your browser settings. Blocking cookies may affect the way our Website works on your digital asset or device.

Online Communications

Our Website allows you to submit a question or inquiry to us through a form. We use the personal information you provide only to address your question or inquiry.

How to manage your cookies

You can set up your browser to disable cookies at any time. For instructions on how to disable cookies, please visit the links below:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Microsoft Edge](#)
- [Google Chrome](#)

If your browser is not listed above, we encourage you to consult information technology experts.

Do not track

We do not currently respond to browser Do Not Track signals.

Security

We protect personal information in our files from loss, misuse, unauthorized access and alteration by using technical, physical and administrative methods. We monitor our systems frequently to ensure we have implemented up-to-date and effective security measures.

Our systems are stored on Amazon AWS servers and as such are subject to Amazon's physical, technical, and administrative security measures. For more information, please visit <https://aws.amazon.com/security/>.

However, you acknowledge that no one security system is impenetrable. By sharing your personal information with us, your personal information may be at risk should an external party breach our systems. We will comply with our legal obligations to notify you as soon as is feasible if it is reasonable to believe that a breach has created a real risk of significant harm to you.

We try to correct all errors and ensure that your personal information on file is updated and remains accurate. We encourage you to contact us to update the personal information where you are aware our records are incorrect.

If you have questions about our security practices, please contact us at security@kahi.io.

Minors

Customers of Kahi must be persons who have attained the age of majority in the jurisdiction where they reside.

Changes to our Policy

We reserve the right to change this Policy from time to time. If we may any significant changes, we will notify you of the changes and post the most recent version of this Policy in effect on our Website. Please note the 'Last Updated' date at the bottom of this page.

CONTACT US

If you would like to review or correct your personal information we have on file, or have any other concerns regarding your privacy rights, please send a written request to:

Privacy Officer
2-334 First Avenue, Ottawa, Ontario, K1S 2G9
613-613-884-8861
privacy@kahi.io

We will provide you with access to your personal information, unless otherwise required by law.

You acknowledge that when you reach out to us to exercise your privacy rights, you are consenting to our collection of your name and contact information so that we can authenticate you and communicate with you regarding your privacy request.

Appropriate Authority

If you feel Kahi has not addressed your privacy related concerns in a satisfactory manner, you can contact the appropriate governmental authority in your jurisdiction. These governmental bodies are often called data protection authorities, information commissioner's offices, or supervisory authorities.

CHALLENGING COMPLIANCE

Company will respond to questions about this policy and our legal compliance. We will investigate all challenges and attempt to resolve all complaints. If you feel we have not met our legal obligations under this policy or applicable laws, please contact our Privacy Officer at privacy@kahi.io. After we investigate, we will make a decision and update our policies and practices as necessary.

UPDATES

We review and revise this Privacy Policy regularly. We reserve the right to change our Privacy Policy at any time by posting a new Privacy Policy on our Website.

This Privacy Policy was last updated on 2020-04-02.

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