

# PRIVACY POLICY

Effective as of January 26, 2023

This Privacy Policy describes how Studio Iregular Inc. (“Iregular,” “we,” “us,” or “our”) collects, uses, discloses, stores and otherwise processes personal information, and the rights you have regarding our use of your information.

In particular, it covers how we handle personal information obtained from your interactions with us in person, via telephone or electronic communications (including through email and third-party social media platforms), or on our following websites:

- <https://iregular.io>
- <https://ourcommonhome.art>

(the above-referenced websites collectively, the “Websites”)

All personal information thus collected is subject to this Privacy Policy and controlled by Iregular, which is headquartered in Canada at the address listed in section 13 below (“How to Contact Us”).

**BY USING OUR WEBSITES OR OTHERWISE PROVIDING US WITH YOUR PERSONAL INFORMATION, YOU CONSENT TO OUR PRACTICES AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE, PLEASE DO NOT USE THE WEBSITES OR OTHERWISE PROVIDE US WITH YOUR PERSONAL INFORMATION.**

This Privacy Policy contains the following sections:

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## **1. WHAT IS PERSONAL INFORMATION**

Unless otherwise specified in this Privacy Policy, we use the term personal information to refer to any information that relates to an identified or identifiable individual, whether it directly identifies such an individual or can be reasonably used to identify them. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

## **2. WHEN AND HOW WE COLLECT YOUR PERSONAL INFORMATION**

### **2.1 Information collected as you provide it to us**

We collect certain information that you voluntarily provide us when you interact with us directly. For example, we may collect information through:

- Your communications and dealings with us, whether in person or by telecommunication, including telephone and email, including when you post comments or send private messages to our social media pages or accounts.
- Your use of certain features of our Websites, such as when you submit your email to subscribe to our newsletter.
- Your employment application, submitted through our Websites or other means, as applicable.
- Your participation in one of our interactive public art exhibitions, either online or in person, to the extent personal information is collected with your consent for the purposes of the exhibitions, in which case we will inform you and obtain your consent at the time of collection.

### **2.2 Information collected through automated means**

As you interact with our Websites, we automatically collect certain “technical information” and “usage information” (as defined in Section 3 below) about your computer equipment, browsing actions and patterns. Notably, our Websites use a technology called “cookies”. A cookie is a tiny element of data that our Websites can send to your browser, which may then be stored on your hard drive so that we can recognize you when you return to the Websites. We use cookies for analytical purposes to understand which areas of our Websites are useful and which areas need improvement, which assists us in planning for future improvements to the Websites. You may set your browser to notify you when you receive a cookie or not to allow all or certain cookies by opting out of the use of such technology. However, if you decide not to allow cookies from our Websites, you may not be able to take full advantage of all the features of the Website. Our Websites may also use technology allowing us to understand which pages you visit on the Website. We may use this to optimize and tailor our Websites for you and other potential visitors, and for marketing purposes on our Website and on the websites of Iregular’s affiliated partners. We may also receive Technical Data about you if you visit other websites employing our cookies.

### **2.3 Information collected from other sources**

When you “like” or “follow” us on social media platforms, we may collect information associated with your account on the platform in question, such as your name, e-mail address, and any

comments or content you voluntarily publish through the public features of such platforms to the extent the information is relevant for our legitimate interests.

### **3. WHAT PERSONAL INFORMATION WE COLLECT**

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Contact information**, which includes information such as name, surname, email address, title, telephone number, postal address and contact preferences, when you provide such information as part of your interactions with Iregular.
- **Social media information**, which includes information associated with your social media accounts and related profiles, such as your name, username, email address, profile picture, date of birth, age and gender.
- **Technical information**, which includes IP (Internet Protocol) address, clickstream and other related information, such as the websites you visited immediately before and immediately after visiting our Website, your time zone and location settings, technical information about your Internet service provider and other technologies on the devices you use to access our Websites.
- **Usage information**, which includes the number of visits to our Websites, as well as the date and average time spent on our Websites.
- **Marketing communications information**, which includes your email and preferences with respect to receiving marketing and other commercial communications from us.

We may also collect, use, store and disclose aggregated data, such as statistical and demographic information, for analytical purposes. Our aggregated data could be derived from your personal information, among others, but is not considered personal information if it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing certain features or pages of our Websites. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we will treat the combined data as personal information and use it in accordance with this Privacy Policy.

**We do not collect any personal information that includes details about racial or ethnic origin, political opinions, religious or philosophical beliefs or union membership, nor any genetic or biometric data for the purpose of uniquely identifying a natural person, nor any data concerning the health, sexual life or sexual orientation of a natural person.**

### **4. HOW WE USE YOUR PERSONAL INFORMATION**

#### **4.1 General principles**

We limit the collection and use of personal information to what is reasonably required to fulfill the purposes for which it is collected. Internally, we also limit access to your personal information to those who need it to fulfill their duties.

#### **4.2 Legal grounds**

We undertake to process your personal information only as permitted or required by law. Different jurisdictions have different requirements and terminology for what constitutes a lawful ground for the processing of personal information (including “personal data” as defined in the

European Union’s *General Data Protection Regulation*). Most commonly, we will process personal information in accordance with at least one or more of the following legal bases or justifiable needs, as applicable:

- **Your consent.** For example, where the law requires that we obtain your consent before we process certain information, we will first obtain your consent accordingly.
- **As necessary for the performance of an agreement with you.**
- **As necessary for our legitimate interests (or those of a third party), except where your own interests and fundamental rights override them (see section 12).** This refers to our legitimate interests in operating and managing our activities, for example we may process personal information to the extent it is necessary to operate the Websites; to perform internal analytics and research concerning the use of our Websites and improve user experience, to test and create new art exhibitions; to provide you with information about our activities (subject to consent requirements where applicable); to ensure a safe environments for our employees; to defend our legal rights; and to prevent fraud.
- **As necessary to comply with our legal obligations.** For example, when it is necessary to process certain personal information to be compliant with a law that applies to us, including tax and employment laws.

#### 4.3 Specific purposes

You will find in the table below a description of the ways in which we plan to use your personal information and the primary legal grounds on which we rely to do so.

Purposes/Activities	Categories of information	Legal grounds
Your communications and dealings with us	If you contact us with a comment, suggestion, request, question or other kind of submission or feedback (“ <b>Communications</b> ”) through one of our electronic forms, through email or via telephone, or on social media, we may collect some of your personal information, as well as the content of your Communications. Your personal information will be used to process and respond to or deal with your Communications as appropriate. We may also use your Communications to improve our Websites and other activities, or develop new ones.	<ul style="list-style-type: none"> <li>• Consent (including via this Privacy Policy)</li> <li>• Necessary for our legitimate interests (to operate our business and answer your questions or requests)</li> </ul>
Subscription to our newsletter, email communications and messaging services to receive news and updates	Occasionally, we may collect certain personal information (such as surname, first name, postal code, country, province, gender, telephone number and email address) in order to send you emails or other correspondence regarding our Websites and activities. You can remove your email address from our mailing list at any time by following the opt-out	<ul style="list-style-type: none"> <li>• Consent (including via this Privacy Policy)</li> <li>• Necessary for our legitimate interests (to operate and grow our business and reach out to those who may be interested in what we do,</li> </ul>

Purposes/Activities	Categories of information	Legal grounds
	instructions included in each of our commercial electronic messages. You can also remove your email address from our mailing list by contacting us as described in the section “How to Contact Us” at the end of this Privacy Policy. Your request will be processed within the time periods prescribed by law, as applicable.	improve our marketing strategies, and further develop our current Websites and activities or new ones).
Interactions with us on social media	When you share or consult our content on social media platforms, this allows us to also have access to certain information associated with your social media accounts (for example the social media platform used, your name, username, email address, profile picture and gender). We may use such information to personalize your visit of the Websites and of third-party networking websites, plug-ins and applications. We may also use this information to study how people follow and take interest in our activities, improve our marketing strategies, and further develop our current Websites and activities or new ones.	<ul style="list-style-type: none"> <li>● Consent (including via this Privacy Policy)</li> <li>● Necessary for our legitimate interests (to operate and grow our business, to study how people follow and take interest in our activities, to improve our marketing strategies, and further develop our current Websites and activities or new ones).</li> </ul>
Technical and Usage information	When you visit our Websites, Iregular will automatically collect certain information from your devices. For all visitors of the Websites, we collect the IP (Internet Protocol) address and clickstream, as well as other information, such as the websites visited immediately before and after the visit to our Website, page requests, browser type, operating system, Internet service provider, the number of visits to our Website, the date and the average time spent on our Website. We use this information to administer and protect our Websites, monitor and improve them, study how our Websites are used, understand which portions of our Websites are popular and analyze trends and use patterns, and analyze how people take interest in our activities.	<ul style="list-style-type: none"> <li>● Consent (including via this Privacy Policy)</li> <li>● Necessary for our legitimate interests (to provide the Websites with a safe and sound user experience, to operate our and grow business, to study how people use our Websites or take interest in our activities, to improve our marketing strategies, and further develop our current Websites and activities or new ones)</li> <li>● Necessary to comply with certain legal obligations</li> </ul>
Customer relationship management (CRM) databases.	When you sign up for our newsletter, purchase artwork from us, hire us for artwork or exhibitions, or inquire about our artwork and activities, we may collect personal information collected in the course of these activities to supplement and update our databases relating to customer relationship management. In this	<ul style="list-style-type: none"> <li>● Consent (including via this Privacy Policy)</li> <li>● Necessary for our legitimate interests (to operate and grow our business, to study how people use our Websites</li> </ul>

Purposes/Activities	Categories of information	Legal grounds
	context, the personal information collected is used to generate mailing lists and reports for internal use about the relationship between Iregular and those who are or may be interested in its artwork and activities, in order to monitor and/or improve our Websites, artwork and activities.	or take interest in our activities, to improve our marketing strategies, and further develop our current Websites and activities or new ones
Voluntary participation in our interactive public art exhibitions online or in person	If you choose to participate in one of our interactive public art exhibitions, either online or in person, we may collect personal information for the purposes of allowing your participation to take place. This is not always the case, but if it is, we will inform you and obtain your consent at the time of collection.	<ul style="list-style-type: none"> <li>● Consent</li> <li>● Necessary for the performance of an agreement with you if your participation is subject to conditions.</li> </ul>

**5. HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

Except as otherwise permitted or required by law, we will only share your information with the following categories of third parties for the following purposes, and undertake to comply with all mandatory requirements for such disclosures:

- **Our service providers:** We provide access to or share your information with trusted third parties who provide services on our behalf in Canada, the United States or abroad, such as for marketing and advertising, data storage and security, and analytics purposes, including Google for the purpose of using the various Google Analytics features described herein. We only provide these service providers with the information they need to fulfill their task, and we do not authorize them to use or disclose your personal information for their own commercial activities or any other purposes.
- **Other parties involved in a business transaction:** In the event that we sell part or all of our business, that we sell, lease or transfer assets, that we enter into a loan, a financing or a security transaction, or are otherwise involved in a business merger or transfer, including the contemplation of any such transaction, we may share certain personal information with the parties involved to the extent necessary for the purposes of such transaction and subject to confidentiality undertakings.
- **Authorities and third parties for lawful investigation and protection purposes:** We may disclose personal information to comply with a search warrant or other legally compelling disclosure request or order issued by an appropriate authority, including an investigative body. We may also disclose personal information as reasonably necessary to enforce our own rights or defend legal claims against us, or to prevent actual or suspected loss or injury to persons or damage to property. This includes exchanging information with third parties where there is a good faith belief that it is necessary to protect or enforce our rights, including investigating potential violations, or to prevent fraud or other actual or reasonably suspected contraventions to the law.

## **6. THIRD-PARTY LINKS**

Our Websites may contain links to other sites, plug-ins, apps and services that we do not own or control (collectively, “**Third-Party Services**”). Links to such Third-Party Services are provided for convenience only and do not constitute an endorsement or recommendation. Such Third-Party Services are subject to their own privacy statements, terms of use and other legal notices, as the case may be, and we assume no liability regarding how the third parties that operate them may collect, use, disclose, store or otherwise process your personal information. Except as provided in this Privacy Policy, we will not share your personal information with such third parties without your consent.

## **7. HOW WE PROTECT YOUR PERSONAL INFORMATION**

We will take such administrative, contractual, technical, and physical safeguards as are reasonably necessary to protect personal information from unauthorized access, use, disclosure, loss or other harm, and will comply with applicable legal requirements for reporting, notifying, documenting and responding to security incidents affecting personal information.

## **8. HOW LONG WE KEEP PERSONAL INFORMATION**

We retain personal information only for as long as necessary to fulfill the purposes for which it is collected and used, or as otherwise authorized or required by law, after which we destroy or anonymize it.

## **9. CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION**

We are primarily located in Quebec, Canada, so your personal information is likely to be collected, used, stored, transferred, disclosed or otherwise processed there. However, it may also be collected, used, stored, transferred, disclosed or otherwise processed elsewhere, including by or to some of our staff, our subsidiaries and affiliates, and our service providers, which may be located in various jurisdictions outside Quebec and Canada.

Consequently, your personal information may become subject to disclosure, including compelled disclosure to foreign authorities, under the laws of these other jurisdictions, which may not always provide the same level of protection as Canadian, EEA or other privacy laws.

In all cases, we will comply with applicable legal requirements for cross-border data transfers and we will take all steps reasonably necessary to protect such information in accordance with the law and industry standards.

## **10. CHILDREN’S PRIVACY**

Our activities and Website are intended for general audiences, and not directed at children. If we become aware that we hold “personal information” (as defined by the United States *Children’s Online Privacy Protection Act*) from people under the age of 13 without parental or legal guardian consent, we will take reasonable steps to delete it as soon as possible. We also do not knowingly process “personal data” (as defined by the European Union’s *General Data Protection Regulation*) of residents of the European Economic Area (EEA) under the age of 16 without parental or legal guardian consent. If we become aware that we hold data from an EEA resident under the age of 16 without parental consent, we will take reasonable steps to delete it as soon as possible. We will also comply with other age restrictions and requirements in accordance with applicable laws. If you are not of legal age to agree to our Privacy Policy in

your country, your parent or legal guardian must agree to this Privacy Policy on your behalf. If we are made aware that we hold personal information from a user who is not of legal age, without parental or legal guardian consent, we will delete this personal information.

## **11. CHANGES TO PRIVACY POLICY**

This Privacy Policy may be revised from time to time to reflect changes in applicable laws or our practices regarding personal information. If we make a material change to this Privacy Policy, we will post the revised version on our Websites and provide notices as required by law. You can tell when this Privacy Policy was last revised from the “Effective Date” indicated at the top. We will treat your personal information in accordance with the most recent version of the Privacy Policy.

## **12. YOUR LEGAL RIGHTS**

Depending on your jurisdiction, and subject to applicable legal conditions and exceptions, you may exercise one or more of the following privacy rights with respect to your “personal information,” “personally identifiable information” or “personal data,” as such terms are defined under applicable law (collectively referred to in this section as “personal information”):

- The right to be informed of the categories of personal information we collect or disclose about you, the categories of sources of such information, our purposes for collecting your personal information and the categories of third parties to whom we disclose your personal information;
- The right to access to and/or a copy of personal information we hold about you;
- The right to the correction, update, or erasure of personal information we hold about you;
- The right to withdraw the consent you gave us for the processing of your personal information. (This will not affect the lawfulness of processing based on consent before its withdrawal.)
- The right to the portability of your personal information in a structured, commonly used, machine-readable format.
- The right to the suspension or restriction of the processing of your personal information in certain situations, such as if you want us to establish its accuracy; if our use of it is unlawful, but you do not want us to erase it; if you need us to retain it even if we no longer need it because you need it to establish, exercise or defend legal claims; or if you have objected to the processing of your data, but we need to retain it while we verify whether we have overriding legitimate grounds allowing us to continue to process it.
- The right not to be subject to automated decision-making, or to be informed thereof and to challenge it and make representations, as the case may be.
- The right to object to our processing of your personal information on grounds relating to your specific situation if it impacts on your fundamental rights and freedoms.
- The right to object to the processing of your personal information for direct marketing or targeted advertising purposes.

Furthermore, privacy law is in constant evolution, such that you may have additional rights under applicable law that are not described in this Privacy Policy. If so, we promise to do our best to accommodate you and to comply as soon as reasonably feasible.

## **13. HOW TO CONTACT US**

If you have any questions, comments, or requests regarding the processing of your personal information, including to access, update or correct your personal information, or to assert another privacy right, please contact our Privacy Officer at [info@iregular.io](mailto:info@iregular.io) or:

**Studio Iregular Inc.**

Attention: Privacy Officer  
6250 Hutchison, 5<sup>th</sup> floor  
Montréal, Québec, H2V 4C5  
Canada