Welcome! Protecting your privacy is really important to us. accordingly, we at Lightspeed POS USA Inc. (“Lightspeed” or “we” or “us” or “our”) are providing this Privacy Policy to explain our practices regarding the collection, use and disclosure of information that we receive when you use or visit our websites, or use our products or services (collectively, the “Services”). This Privacy Policy applies only to those websites, services and applications included within “Services” and does not apply to any third-party websites, services or applications, even if they are accessible through our Services. Your linking to a third-party website, service or application is entirely at your own risk and subject to the terms and conditions of such website, service or application.

To Whom Does this Privacy Policy Apply?

This Privacy Policy applies to everyone who uses our Services, but sometimes we direct parts of it toward particular groups of users. When we do, we use the following special terminology to refer to them:

"User" means anyone who uses our Services.
"Subscriber" means anyone who purchases or subscribes to one or more Lightspeed Services.

What Information Do We Collect?

We Collect Some Information From All Users: As part of our Services, we use various technologies such as "session" and "persistent" cookies (small data files that we transfer to your computer), web beacons (tiny image files on web pages that communicate information about the page viewer to the beacon owner), log data, and third-party analytics services to collect and analyze information about Users. This includes things like Users' search preferences, saved searches, aspects of their use of the Services, and location.

We use "session" cookies to keep you logged in while you use our Services, to better understand how you interact with our Services, and to monitor aggregate usage and web traffic information on our Services. We use "persistent" cookies to recognize you each time you return to our Services. For example, we create a persistent cookie that includes some basic information about you, like your most recent search. We use this persistent cookie to remember your preferences and, if you create an account, to make your user experience consistent after you register.

Our servers automatically record information ("Log Data") created by your use of the Services. Log Data may include information such as your IP address, browser type, operating system, the referring web page, web pages visited, location, your mobile carrier, your computer or mobile device type, search terms and cookie information. We receive Log Data when you interact with our Services, for example, when you visit our websites, sign into our Services, or interact with our email notifications.

Most Internet browsers automatically accept cookies, but you can change your settings or use third-party tools to refuse cookies or prompt you before accepting cookies from the websites you visit. You can also use your browser settings or other tools to delete cookies you already have. Please be aware that some parts of our Services may not work for you if you disable cookies.

Consent: If you contact us through one of our websites, we ask you to provide certain personally identifiable information like your name, email address, or work street address and telephone number (“Personal Information”). Your provision of Personal Information means you agree and consent that we may collect, use and disclose your Personal Information under this Privacy Policy. Consent may be given expressly, by signing a document, agreeing through electronic means or verbally, or impliedly by providing Personal Information voluntarily. Certain Services can only be offered if you provide Personal Information to us, and if you choose not to provide us with such required Personal Information, we may not be able to offer you our Services.
Information We Collect from Users with Lightspeed Accounts: Some of our Services require you to register and set up an account with us. When you create an account, we ask you to provide us with certain Personal Information.

Information We Collect from Subscribers: If you become a Subscriber, we will ask you to provide certain information in order to set up your account. We ask all Subscribers who set up accounts to provide their name, their employer (if applicable), a phone number and an email address. We will also collect financial data like credit card information and billing addresses from Subscribers, so that we can handle billing. If you are a Subscriber, a Lightspeed representative may call you to verify your information.

For Canadian Users and Subscribers: When you voluntarily and expressly provide us with Personal Information an existing business relationship is created under Canada’s Anti-Spam Law (CASL). We may use your Personal Information to provide you with information that is relevant to you or your business, such as newsletters, event invitations, or updates about Services. In some cases, we may collect, use or disclose Personal Information without your consent or knowledge. For example, we may use your Personal Information where it’s been conspicuously published on a website or directory. While we offer you some control over marketing communications, certain transactional, relationship and legally required communications will not be affected by the choices you have made about marketing communications. You have the right to revoke your consent to the collection, use and disclosure of your Personal Information and to unsubscribe to electronic communications at any time (as more fully set out below).

Electronic Messages to Canadians: Our Services allow you to collect and use the Personal Information of your customers, through communications or transactions facilitated by Lightspeed. You may not use Services to send your Canadian-based customers commercial electronic messages without first obtaining their express consent.

Additional Information About You that We Obtain from Third Parties: We may sometimes obtain Personal Information about you from third parties (e.g., Facebook, Twitter, Google) and use it to re-market our Services or provide a more tailored experience with our Services.

Location Data: If you provide location information during the registration process or at any other time via your account settings, we will store that information and associate it with your account. In some cases we may collect and store information about where you are located, such as by converting your IP address into a rough geolocation. If you use mobile Services, we may collect location data directly from your mobile device automatically if your device allows us to do so. In some circumstances, you may have to opt into sharing your location data with us. Additionally, your mobile device may provide you with choices about how and whether location data is shared with us.

Why We Collect Information from You

Lightspeed provides a variety of products and services focused on the retail industry. We use information we collect through the Services to:

- Respond to your questions or requests for additional information;
- Provide you with quotes that you have specifically requested or communications you have indicated you wish to receive (e.g., e-newsletters, reminders of subscription expiration dates);
- Provide and improve our Services to you;
- Manage our customer relationship with you and to provide you with customer support;
- Process payments to us;
- Research and analyze your use of or interest in our Services and those products and services offered by others;
- Help you find the most relevant information for your situation by customizing our Services to optimize your experience;
- Analyze the effectiveness of our Services;
- Communicate with you via email, telephone, mobile, text (SMS), postal services, social media and websites and update you with Lightspeed related news and information or to tell you about products or services that may be of interest to you, if you allow us to do so;
• Verify your eligibility and deliver prizes in connection with promotions, contests and sweepstakes;
• Perform the functions described to you at the time of collection.

How We Use Your Information

Personal Information: We may engage third-party service providers to work with us to administer, provide and improve the Services, and these third-party service providers have access to Users’ Personal Information only to perform these services for us. Some of these third-party service providers may be located outside the European Economic Area. If this is the case, we will provide for an adequate level of protection regarding your personal data. Otherwise, we will only share your Personal Information at your direction and according to this Privacy Policy.

Non-Personally Identifiable Information: In order to provide and improve our Services, we may use and disclose to our service providers and analytics partners non-personally identifiable information that we collect, including cookie data and Log Data. We retain the right to use, at our reasonable discretion, any information, in any form, about more than one individual where the identity of the individuals is not known and cannot be inferred.

Social Network Sharing: When you use any social network sharing function we include with the Services (for example, sharing on Facebook), your sharing activity will be processed through a third party's site or service. These third parties' privacy policies, not ours, govern the collection and use of the information collected on those sites or networks, including Personal Information.

User-Generated Content (UGC): Some parts of our Services allow Users to submit and view UGC. UGC includes such things as posting a question, an answer or a blog post. When you post UGC, other Users will be able to see certain information about you, such as your username or handle. You should be aware that any Personal Information you submit in UGC provided by you can be read, collected, distributed or used by other Users and could be used by third parties to send you unsolicited messages. We are not responsible for the Personal Information you choose to include in the UGC you provide through the Services.

Privacy Shield Principles: All personal data that we receive from the European Economic Area shall be processed in accordance with the Privacy Shield Principles.

Protecting Ourselves and Our Users: We may release Personal Information when we believe that doing so is appropriate to comply with applicable laws, regulations or legal requests; to enforce or apply our policies and guidelines; to initiate, render, bill, and collect amounts owed to us; to protect our rights or property; to protect the safety of our Users; to address fraud, security or technical issues; to prevent or stop activity that we consider to be illegal or unethical; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.

Retention: We shall only keep your information for as long as it serves a purpose of processing for which we have collected the information or received your approval.

Accountability for Third Parties: We may transfer personal data to third parties to process this data on our behalf. We will ensure that such data may only be processed for limited and specified purposes consistent with the consent provided by you. In addition, such third party processor will process the data with the same level of protection as the protection provided by us including adherence to the E.U.-U.S. Privacy Shield Principles to the extent it relates personal data that is transferred from the European Economic Area. We remain liable for any failure of the third party to do so unless we can prove that we are not responsible.

Compliance with Privacy Shield

Lightspeed POS USA Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Lightspeed POS USA Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this
privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit https://www.privacyshield.gov/.

**General Matters**

**Unsubscribing to Lightspeed Communications:** You may unsubscribe at any time from receiving non-Service related communications from Lightspeed through your account settings or through the instructions included in the communication. You can also contact us at hi@lightspeedpos.com.

**Accessing, Modifying and Deleting Your Personally Information:** You have the right to access your Personal Information at any time and modify it or delete it. We will take steps to delete your information as soon as is practicable, but some information may remain in archived/backup copies for our records or as otherwise required by law. If you wish to access, verify and/or modify your Personal Information, please send us a written notice in this regard to the email address indicated at the end of this Privacy Policy.

**Data Location:** Your data may be stored on servers located in a country other than where you reside. Personal Information is always subject to the local laws of the jurisdictions within which it is collected, used, disclosed and/or stored, and may be accessed by governmental authorities and law enforcement agencies in those jurisdictions.

**Children:** The Services are not directed to children under 13, and we do not knowingly collect or store any Personal Information about persons under the age of 13. If we learn that we have collected Personal Information of a child under 13, we will take steps to delete such information from our files as soon as practicable.

**Third-Party Websites:** Our Services may contain links to other websites and services. Any information that you provide on or to a third-party website or service is provided directly to the owner of the website or service and is subject to that party's privacy policy. Our Privacy Policy does not apply to such websites or services, and we are not responsible for the content, privacy or security practices and policies of those websites or services. To protect your information, we recommend that you carefully review the privacy policies of other websites and services that you access.

**Sale/Merger:** Information about our Users is a business asset of Lightspeed. Consequently, information about our Users, including Personal Information, may be disclosed as part of any merger or acquisition involving Lightspeed, the creation of a separate business to provide some or all the Services, the sale or pledge of Lightspeed’s assets, as well as in the event of an insolvency, bankruptcy or receivership.

**Security:** Your Personal Information is treated as private, confidential information by Lightspeed and we strive to ensure that Personal Information under our control, regardless of format, is protected and kept secure at all times. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot absolutely guarantee the protection of any information shared with us.

**Affiliated Companies:** Lightspeed is a global company consisting of several companies having offices around the world. To do business globally and help improve Services provided, Lightspeed may share User and Subscriber information with its subsidiaries and affiliates. These companies are in countries with different laws regarding data collection and privacy than the country from which Lightspeed collected such data. You agree to the international sharing of such data among Lightspeed related companies.

**Privacy Policy Changes:** We may update this Privacy Policy from time to time to reflect changes to our information practices. If we make material changes to our Privacy Policy, we will notify you by prominently posting the revised Privacy Policy on this Site (including the revision date). Your continued access or use of our websites constitutes your acceptance of the Privacy Policy as revised. It is your responsibility to review the Privacy Policy frequently.

**Enforcement Authority:** The Federal Trade Commission has jurisdiction over Lightspeed USA POS Inc.’s compliance with the EU-U.S. Privacy Shield Framework.
Contacting Us: If you have any questions, suggestions or complaint regarding our Privacy Policy, please contact us at legal@lightspeedhq.com or via the information below:

If you are located outside the European Economic Area:

Lightspeed POS USA Inc.
700 Saint-Antoine St. E., Suite 300
Montréal (Québec)
H2Y 1A6 Canada

or

If you are located in the European Economic Area:

Lightspeed Netherlands B.V.
Herengracht 54
1017WG Amsterdam
The Netherlands

Independent dispute resolution: If we are not able to solve your complaint in relation to our con-compliance with the Privacy Shield Principles you have the right to refer your complaint to JAMS which we designated as our independent recourse mechanism. Mediation will be conducted pursuant to JAMS International Mediation Rules. If you wish to file case please be referred to JAMS’ website for more information (https://www.jamsadr.com/eu-us-privacy-shield).

Binding arbitration: If the independent dispute resolution has not resolved your complaint, you have the possibility, under certain conditions, to invoke binding arbitration. For more information about the process we refer to Annex 1 to the Privacy Shield Principles. (https://www.privacyshield.gov/article?id=ANNEX-I-introduction)