

BALAY-A

PRIVACY POLICY

EXECUTION VERSION v2.0

15428548 Canada Inc., operating as BALAY-A

Effective Date: _____

Legal-review status: This document is drafted for operational use and final Ontario counsel review. Working material — not licensed Ontario legal advice. It should be implemented together with the Client Terms of Service, Provider Services Agreement, booking flow and payment configuration.

1. WHO WE ARE

This Privacy Policy ("Policy") describes how 15428548 Canada Inc., operating as BALAY-A ("Balay-A", "we", "us" or "our") collects, uses and discloses personal information. Balay-A operates an online technology marketplace that connects customers ("Clients") with independent service providers ("Providers"). Balay-A is a marketplace operator — it is not an employer, staffing agency, recruiter, healthcare provider or home-care agency. Our Privacy Officer can be reached at the contact in section 15.

2. WHAT THIS POLICY COVERS

This Policy applies to personal information we collect through our website, application, marketplace, communications, booking and payment services (collectively, the "Platform"). It does not apply to information a Provider collects or handles independently outside the Platform. Providers are independent businesses and are responsible for their own privacy practices for information they obtain outside the Platform. We follow the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable Ontario privacy law.

3. INFORMATION WE COLLECT

We collect only the information we need to operate the marketplace. We do not collect more than necessary.

From Clients, we may collect:

- Name and contact information (phone number, email address).
- Service address where booked services will be performed.
- Language preference, so we can match you with a Provider who speaks your

language.

- Booking details, booking history, reviews you write, and messages you send through the Platform.
- Payment information — card details are processed directly by our payment processor; we do not store full card numbers on our own systems.

From Providers, we may collect:

- Name, contact information, service area and languages spoken.
- Professional credentials and certifications (for example, CPR/first aid), and verification documents.
- Proof of insurance coverage.
- Posted rates, availability and booking history.
- Payout and banking details needed to pay you — these are collected and held directly by our payment processor, not stored on our own systems.
- Reviews written about you and messages you send through the Platform.

We do not collect Social Insurance Numbers, health card numbers or other government identifiers. Please do not send them to us — if you do, we will delete them.

Automatically, when you use the Platform, we may collect basic technical information such as device type, browser type, and pages visited, to keep the Platform secure and working properly (see section 12).

4. WHY WE COLLECT IT

We use personal information to:

- Create and manage Client and Provider accounts.
- Match Clients with Providers, including by language preference and service area.
- Process bookings, payments, payouts, cancellations and refunds.
- Verify Provider credentials, certifications and insurance.
- Communicate about bookings, account matters and Platform updates.
- Keep the Platform safe — investigating incidents, enforcing our agreements and preventing fraud.
- Meet legal, tax and record-keeping obligations.

We may also use de-identified or aggregated information — information that cannot reasonably be linked back to you — to understand how the Platform is used and to improve it.

We do not use personal information for purposes a reasonable person would consider inappropriate, and we do not sell personal information to anyone.

5. CONSENT

By creating an account, making a booking or listing services on the Platform, you consent to the collection, use and disclosure of your personal information as described in this Policy. Where the law requires express consent — for example, for sensitive information — we will ask for it separately. You may withdraw consent at any time by contacting us, subject to legal or contractual limits (for example, we must keep certain records for tax purposes even after you close your account). Withdrawing consent may mean we can no longer provide you with Platform services.

6. HOW WE SHARE INFORMATION

We share personal information only as needed to run the marketplace:

- With Providers and Clients: when a booking is made, the Provider sees the Client's name, service address, contact details, language preference and booking details — only what is needed to perform the booking. Clients see the Provider's public profile, credentials summary, languages and reviews.
- With our payment processor: to process Client payments and Provider payouts. Card details are handled by the processor under its own security standards.
- With service providers who help us operate the Platform (for example, hosting or email services), under contracts that require them to protect the information.
- When required by law, court order or a regulator, or to protect someone's safety.

We do not sell, rent or trade personal information. Some of our service providers may store or process information outside Canada, including in the United States, where it may be subject to the laws of that jurisdiction.

7. HEALTH-RELATED INFORMATION

Balay-A is not a healthcare provider and does not provide medical or clinical services. Please do not share more health information than is needed to arrange a booking. Any health-related details you choose to share to help a Provider prepare for a visit are handled under this Policy, and Providers are expected to treat such information confidentially under their agreement with Balay-A.

8. HOW LONG WE KEEP INFORMATION

We keep personal information only as long as needed for the purposes described in this Policy or as required by law. Booking and payment records are generally kept for at least seven years to meet tax and legal requirements. When information is no longer needed, we securely delete or anonymize it.

Closing your account: you may close your account at any time by contacting us. When you do, we delete or anonymize your personal information within a reasonable time, except for records we must keep by law (for example, tax and payment records) and

information needed to resolve outstanding disputes.

9. HOW WE PROTECT INFORMATION

We use reasonable administrative, technical and physical safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. Access is limited to people who need it to do their work. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

If a privacy breach occurs that creates a real risk of significant harm to you, we will notify you as soon as feasible and report the breach to the Privacy Commissioner of Canada, as required by law. We will also keep records of all breaches as the law requires.

10. YOUR RIGHTS

You may:

- Ask what personal information we hold about you and request a copy.
- Ask us to correct inaccurate or incomplete information.
- Withdraw consent as described in section 5, and close your account as described in section 8.
- Ask questions or raise concerns with our Privacy Officer (section 15).

If we cannot resolve your concern, you may complain to the Privacy Commissioner of Canada.

11. MARKETING COMMUNICATIONS

We may send you service messages about your bookings and account — these are part of the service, not marketing. We will only send you marketing or promotional messages with your consent, and every marketing message will include a clear way to opt out. You can withdraw marketing consent at any time; we will stop within 10 business days.

12. COOKIES AND ANALYTICS

We use cookies and similar technologies to keep you signed in, remember your preferences (such as language), keep the Platform secure, and understand how the Platform is used. You can control cookies through your browser settings; disabling them may affect some features.

13. CHILDREN

Balay-A services are for adults only. We do not knowingly collect personal information from children. If we learn that we have collected information from a child, we will delete

it.

14. CHANGES TO THIS POLICY

We may update this Policy from time to time. The current version will always be posted on the Platform with its effective date. Material changes will be communicated to account holders before they take effect.

15. CONTACT US

Questions, access requests, account-closure requests or complaints about privacy:

Privacy Officer: _____

15428548 Canada Inc., operating as BALAY-A

Email: Balay.a.ottawa@gmail.com

Ottawa, Ontario, Canada

We will respond to privacy inquiries within 30 days where required by law.