

Commtrac Privacy Policy

Dru Comtell Inc.

Last Updated: March 30, 2026

Dru Comtell Inc. (the “Company,” “We,” “Us,” or “Our”), a corporation incorporated under the laws of the Province of Alberta, Canada (Alberta CAN: 202696692), with its registered office at 10180 101st Street NW, Edmonton, Alberta T5J 3S4, operates this website and any associated online platforms (collectively, the “Site”), including the Commtrac™ portal and related client demonstration environments.

This Privacy Policy explains how we collect, use, disclose, retain, and safeguard personal information when you access or use our public website, any associated online platforms (collectively, the “Site”), or any Commtrac™ client portals or demonstration environments. It applies to institutional users and authorised representatives of financial entities or other businesses.

The Company does not offer services to retail (non-institutional) clients and does not engage in regulated financial activities. All substantive software licensing, secure messaging, data verification hosting, or related services are governed exclusively by separate private licensing agreements or services contracts (collectively, “Private Agreements”) executed directly with institutional clients. Those Private Agreements contain their own detailed data protection and privacy terms, which supersede this Privacy Policy to the extent of any inconsistency.

1. Information We Collect

We collect only the personal information that is reasonably necessary to operate the Site, provide limited membership access, facilitate institutional networking and evaluation, and maintain security.

Categories of personal information we may collect include:

- **Account and Registration Information:** When you create a Commtrac™ Network Member account via the Site (processed securely through Wix), we collect your name, business or institutional email address, job title or role, organisation name, and any other details you voluntarily provide during registration.
- **Contact and Communication Information:** Information submitted through contact forms, inquiries, or correspondence with us, such as email address and message content.

- Technical and Usage Information: IP address, browser type, device information, operating system, referring/exit pages, date and time stamps, and general usage patterns collected automatically when you visit the Site or access Client Portals.
- Demonstration and Sandbox Environment Data: In sandbox, demo, or client portal environments, we may collect limited technical logs, test configuration details, session data, and interaction metrics necessary to operate the environments securely and troubleshoot issues.
- Metrics and activity such as account history is securely stored on our cloud servers. What accounts you connect to the Commtrac Network in a sandboxed demo environment is within your full control.

We do not intentionally collect sensitive personal information (such as financial account numbers, health data, or government identifiers) through the public Site or demo environments. Any such information provided in a testing context remains the sole responsibility of the testing institution.

2. How We Collect Information

- Directly from You: Through account registration forms, contact forms, or voluntary submissions on the Site.
- Via Wix Platform: Account creation and certain form submissions are handled securely by Wix. Wix processes and stores this information on our behalf in accordance with its own security standards and data processing agreements. For details on Wix's practices, please refer to Wix's privacy policy (available on the Wix website).
- Automatically: Through server logs, security systems, and essential cookies when you interact with the Site or Client Portals.
- In Demo Environments: Limited technical and session data is collected when institutional users connect test accounts or simulate integrations. All such activity occurs in controlled, non-production environments.

3. Purposes for Which We Use Personal Information

We use the collected personal information solely for the following legitimate purposes:

- To create and manage Commtrac™ Network Member accounts and provide limited access to informational resources and demonstration environments;
- To authenticate users and maintain the security of the Site and Client Portals;
- To respond to inquiries and communicate with authorised institutional representatives;
- To operate, monitor, and improve the functionality and security of demo and sandbox environments;
- To comply with legal and regulatory obligations, including those under Alberta's *Personal Information Protection Act* (PIPA) and the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA), where applicable;

- To protect our rights, enforce our Terms and Conditions, and prevent misuse or unauthorised access.

We do not use personal information for marketing to retail consumers, profiling, or any purpose unrelated to our strictly limited institutional software development and licensing activities.

4. Sharing and Disclosure of Personal Information

We do not sell, rent, or trade personal information. We may disclose personal information only in the following limited circumstances:

- To Wix and other service providers who assist us with hosting, account management, security, or technical operations, under strict confidentiality and data processing agreements;
- To our affiliates or authorised contractors who require access to perform services on our behalf, subject to confidentiality obligations;
- To law enforcement, regulatory authorities, or courts when required by law or to protect our legal rights;
- In the context of a corporate transaction (such as a merger or acquisition), provided the recipient agrees to protect the information in accordance with this Policy.

Institutional clients entering into Private Agreements will have additional or different data sharing terms set out in those agreements.

5. Data Storage, Security, and Retention

Personal information is stored securely on servers managed or contracted through Wix and our cloud infrastructure. We implement reasonable technical, administrative, and physical safeguards to protect personal information against unauthorised access, disclosure, alteration, or destruction.

Demo environments communicate with our cloud servers through secure channels. We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, to comply with legal obligations, or to resolve disputes.

Account-related information is typically retained for the duration of the membership plus a reasonable period thereafter.

6. Your Rights and Choices

Subject to applicable law (primarily Alberta PIPA), you may have the right to:

- Access the personal information we hold about you;
- Request correction of inaccurate or incomplete information;
- Withdraw consent to the collection, use, or disclosure of your personal information (subject to legal or contractual restrictions and reasonable notice);

- Request deletion of your personal information, where appropriate.

To exercise these rights, please contact us using the details provided below. We will respond to verified requests within a reasonable timeframe as required by law. Note that withdrawing consent or requesting deletion may result in termination of your Commtrac™ Network Membership and access to the Site or Client Portals.

7. International Transfers

Personal information may be stored or processed outside of Canada (including by Wix or other service providers). When this occurs, we ensure appropriate safeguards are in place to provide an equivalent level of protection as required under Canadian privacy laws.

8. Children's Privacy

The Site and all services are intended exclusively for institutional and business users. We do not knowingly collect personal information from individuals under the age of 18.

9. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The "Last Updated" date at the top indicates the effective date of the current version. We encourage you to review this Policy periodically. Continued use of the Site after changes constitutes your acceptance of the revised Policy.

10. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or our handling of personal information, please contact us at:

Dru Comtell Inc.

10180 101st Street NW

Edmonton, Alberta T5J 3S4

Canada

Email: legal@commtrac.net

We will endeavour to respond to your inquiry promptly.

Acknowledgment

By accessing the Site or creating a Commtrac™ Network Member account, you acknowledge that you have read and understood this Privacy Policy. You further acknowledge that any use of our licensed technology or production services will be

governed by the separate privacy and data protection terms contained in your Private Agreement.

This Privacy Policy is provided for informational purposes and does not constitute legal advice. We recommend that you consult qualified legal counsel to ensure full compliance with applicable privacy laws for your specific circumstances.

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