

Privacy Policy

Updated January 11th, 2020

INTRODUCTION

Pickaxe Crypto is committed to protecting the privacy and security of customer personal information. This policy explains the types of personal information we collect, how it is used, and the steps we take to ensure customer personal information is handled appropriately.

Our policies and practices have been designed to comply with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) or corresponding provincial privacy acts, as applicable (collectively “Privacy Laws”).

DEFINITIONS

Pickaxe “We”, “we”, “Our”, “our” and “us” means Pickaxe Crypto. and all of its subsidiaries and business operations

Collection

The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

Consent

Voluntary agreement with the collection, use and disclosure of personal information for defined purposes.

Customer or Client

An individual who uses, or applies to use, Pickaxe Crypto products or services.

Disclosure

Making personal information available to others outside of Pickaxe Crypto.

Personal Information

Any information, recorded or unrecorded, which, either on its own or in combination with other information, could be used to identify, contact or locate a specific individual.

Personal Information Protection and Electronic Documents Act (PIPEDA)

Federal legislation that governs the collection, use and disclosure of personal information in the course of commercial activities.

Record

A record of information is in any form or medium, whether written, printed, photographic or electronic form or any other form.

Third Party

An individual or organization outside of Pickaxe.

Use

The treatment, handling, and management of personal information by and within Pickaxe.

ACCOUNTABILITY

Pickaxe takes responsibility for all personal information in its possession or control, including any personal information that is provided to us by our clients, or transferred to third parties for processing, storage or other purposes. We have a designated Privacy Officer who is accountable for compliance with this policy.

IDENTIFYING PURPOSES

Pickaxe will identify the purposes for which personal information is collected at or before the time the information is collected. This information may be communicated orally, electronically or in writing.

Pickaxe collects, uses and discloses personal information for the following purposes:

- To provide financial services to customers;
- To develop, manage and market products and services to meet the needs of customers;
- To obtain credit information and credit reports from credit reporting agencies to assess credit history and credit worthiness and to confirm accuracy of information provided by individuals;
- To confirm details of customer employment;
- To contact customers for products and services that may be of interest;
- To determine the eligibility of customers for different products and services that may be of interest;
- To extract certain information for the purpose of generating statistics for our internal purposes;
- To ensure a high standard of service to customers;
- To record, track and respond to customer feedback and complaints;
- To meet legal and regulatory requirements;
- To confirm the identity of a customer; and
- To collect debt that may become owed to Pickaxe by a customer.

Pickaxe will identify any new purpose(s) for which personal information is being collected, used or disclosed. Clients will be informed by either posting a notice on the Pickaxe Crypto website (<https://pickaxecrypto.io/>), written notification or direct communication.

CONSENT

Notice will be given and consent obtained when collecting, using and disclosing personal information, except when deemed inappropriate.

Pickaxe will make reasonable efforts to ensure that all customers understand the purpose(s) for which personal information is collected, used or disclosed.

Pickaxe will obtain consent to use and disclose personal information at the time the personal information is collected. Pickaxe may also obtain consent to use and disclose personal information after it has been collected, but prior to the personal information being used or disclosed for a new purpose.

Consent may be provided explicitly or may be implied. Consent can be given either orally, electronically or in writing. Use of products and services offered by Pickaxe constitutes implied consent for the collection, use and disclosure of personal information for all identified purposes.

Pickaxe may collect, use or disclose personal information without the individual's knowledge and consent in certain circumstances. For example:

When the collection, use, and disclosure is permitted or required by law;

When the collection, use, and disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely manner;

When seeking the consent of the individual may defeat the purpose of collecting the information;

When use of the information is for an emergency that threatens the life, health or security of an individual;

When needed to collect a debt, to comply with a court order or as otherwise required or authorized by law;

When the information is solely for Journalistic, Artistic, or Literary Intent; or

When the information is publicly available.

An individual may withdraw consent at any time subject to legal or contractual restrictions and reasonable notice. Refusal or withdrawal of consent by a customer may prevent Pickaxe from providing a product or service to that customer. Pickaxe will not unreasonably withhold products or services from a customer who refuses or withdraws consent, but if the personal information is required to offer the product or service, Pickaxe may decline to deal with the customer who will not consent to the use of such personal information. You may contact us for more information about how consent can be withdrawn.

LIMITING COLLECTION

The collection of personal information is limited to that which is related to the identified purposes.

Personal information will be collected by fair and lawful means. Most of the information we collect about you is received from you directly. For example, we may need your name, address, phone number, business phone number, email address, date of birth, or SIN (for identification and/or tax reporting purposes),

Pickaxe may collect personal information from sources such as credit bureaus, employers, personal references, or other third parties that represent they have the right to disclose such personal information.

LIMITING USE, DISCLOSURE AND RETENTION

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Pickaxe shares and stores customer personal and transaction information with affiliated companies of Pickaxe located in Canada for the purposes listed in the Identifying Purposes section above and Pickaxe keeps track of customer feedback and complaints utilizing a third party service provider whose servers are located in . In addition, Pickaxe may use and disclose personal information to third parties as follows:

A Pickaxe affiliate seeking information as an agent of the individual;

A Pickaxe agent attempting to collect a potential debt;

A credit reporting agency to obtain credit information and credit reports to assess credit history and credit worthiness and to confirm accuracy of information;

A third party – where individual consents to disclosure;

A third party – where disclosure is required by law;

A public authority or agent of a public authority where there is imminent danger to the life or property of an individual which could be avoided or minimized by disclosure; and

Conduct surveys to enhance our products and services to meet customer needs.

In the event personal information is disclosed to a third party, Pickaxe will ensure that appropriate security measures are utilized to protect the use and disclosure of personal information.

Only Pickaxe employees are authorized or granted access to personal information about customers when responsibilities reasonably require access.

Pickaxe Crypto will keep personal information only as long as necessary for the fulfillment of the Identified Purpose, or as required by law.

ACCURACY

Reasonable efforts will be made to ensure that personal information is as accurate, complete and up-to-date as is necessary for the purposes for which it is used.

Due to the nature of Pickaxe's business, personal information will be updated on an on-going basis as the client utilizes Pickaxe's products and services.

SAFEGUARDS

Pickaxe is committed to the protection of personal information against loss, theft, unauthorized access, disclosure, duplication, use and modification regardless of the format in which the personal information is held.

Personal information will be protected by reasonable security safeguards appropriate to the sensitivity of the personal information. Such security safeguards may include:

Physical security measures such as restricted access facilities and locked filing cabinets

Shredding of documents containing personal information

Electronic security measures for computerized personal information such as password protection, database encryption and personal identification numbers

Organizational processes such as limiting access to your personal information to a selected group of individuals

Requiring third parties given access to your personal information to protect and secure your personal information

Pickaxe will protect personal information disclosed to third parties by means of contractual agreements with respect to the confidentiality of the personal information and the purposes for which the personal information is to be used.

Pickaxe Crypto will use reasonable security measures in the disposal of personal information.

Pickaxe Crypto will update and review the reasonableness of the security safeguards as needed.

OPENNESS

Information is available to individuals regarding Pickaxe's policies and procedures relating to the management of personal information. Efforts have been made to make these policies and procedures understandable and easily available, either in written or electronic format.

For more information please contact Pickaxe's Privacy Officer at: consumerprivacy@pickaxecrypto.io

INDIVIDUAL ACCESS

You can request access to your personal information kept by Pickaxe Crypto. Customers who wish to contact us should refer to the "How to contact us" section below. You may request any of the following:

What types of personal information we have on record or in our control, how it is used and to whom it may have been disclosed;

Reasonable access to your personal information so you can review and verify its accuracy and completeness and request changes to the information. Pickaxe Crypto reserves the right to decline to make a requested correction but will append a notation to the record of your requested alternative information; and

Updates to your personal information

Subject to applicable exceptions under Privacy Laws, such as where:

Your request would divulge confidential competitive business information of Pickaxe Crypto;

The information is not readily retrievable and the burden or cost of providing access is disproportionate to the nature of the request; and

Access could interfere with or prejudice an investigation or proceeding by Pickaxe Crypto or law enforcement agencies.

COOKIES AND PIXEL TAGS (<https://pickaxecrypto.io>)

Cookies are small data files placed on a user's computer by a website. They may store and transmit information to websites that users visit. <https://pickaxecrypto.io> uses cookies on our website to:

Help provide our on-line products and services to users

Market those products and services

Analyze the flow of traffic to our website

Analyze and track the traffic of website users from page to page within our website

Third party vendors, including Google®, may:

Show our ads on websites on the internet

Use cookies to serve ads based on a user's prior visits to our website

Users may accept or decline cookies through the configuration settings of their web-browser. Users may also opt out of Google's use of cookies by visiting the Google advertising opt-out page.

Pixel tags (or clear gifs) are small, transparent graphic images placed on a website or in an email that are not normally visible to the user. They provide non-identifiable information about your usage of the website. <https://pickaxecrypto.io> uses pixel tags to:

Note pages visited on our website

Assist in the administration of affiliate accounts

CHALLENGING COMPLIANCE

Individuals can address any challenge concerning compliance with the Privacy Policy to Pickaxe's designated Privacy Officer.

Pickaxe will investigate all complaints. The customer will be informed of the outcome of the investigation regarding his or her complaint.

If the Privacy Officer is unable to satisfy the customer's concerns, the customer may then refer to the Privacy Commissioner of Canada at 1-800-282-1376 or info@privcom.gc.ca and, if appropriate, file a written complaint with that office. However, the customer is encouraged to use Pickaxe's internal information and complaint procedures first.