



Merinio - Privacy Statement

September 28, 2026

Merinio - Privacy Statement

This Privacy Statement describes how Merinio Inc. ("we", "Merinio") collects, uses and shares personal information about individuals browsing the Merinio website ("Website") and individuals using the Merinio web application or mobile application (collectively, the "Merinio Service").

The use of the second person ("you", "your", "yours") may refer to a Visitor or User depending on the context.

The contact details of the person responsible for processing personal information under this Privacy Statement are as follows:

Privacy Officer
Merinio Inc.
privacy@merinio.com

1. Definitions

In this Privacy Statement:

- 1.1. "personal information" refers to information about an identifiable individual and is interchangeable with the term "personal data".
- 1.2. "User Data" means personal information about Users.
- 1.3. "User" means an individual accessing or using the Merinio Service at the direction of a Customer.
- 1.4. "Visitor Data" means personal information about Visitors
- 1.5. "Visitor" means individuals visiting the Website or otherwise interacting with our digital content, excluding the Service.

2. Basis for personal information processing

2.1. User Data

We typically enter into a service agreement with a business (our "Customer") whose employees use the Merinio Service. We process User Data on that Customer's behalf and instructions under the service agreement and applicable Data Processing Agreement. The Customer determines the purposes for which its employee information is processed; Merinio acts as its service provider or processor, as applicable under privacy law.

When Users upload personal information to the Merinio Service, Merinio receives and processes that information on behalf of the relevant Customer.

We process identifiable User Data only to deliver, secure and support the relevant Customer's services under its instructions. Product improvement and internal model or algorithm training are limited to data lawfully anonymized so that it no longer constitutes personal information under applicable law; aggregation or pseudonymization alone is insufficient. Internal model training

using identifiable User Data requires the Customer's separate, express written authorization and all other authority required by law. This Privacy Statement does not grant that authorization.

2.2. Visitor Data

We collect and process personal information about Visitors in connection with the operation of the Website in order to improve the quality of the Website, to learn about the browsing habits of Visitors, to organize advertising campaigns targeted based on Website traffic.

We collect and process Visitor Data for the purposes described in this Privacy Statement with consent where required by applicable law, or under a specific exception permitted by that law. Providing information voluntarily for one purpose, such as subscribing to a newsletter, does not by itself authorize unrelated uses. A business interest in analytics or advertising does not replace consent where consent is required.

2.3. Consent

Where consent is required, it must meet the requirements of applicable law for the particular purpose and information involved. We seek express consent where that law requires it, including for the use or disclosure of sensitive personal information when consent is the applicable basis. Implied consent is relied on only where legally permitted. This Privacy Statement is not itself consent to every processing activity it describes. For User Data processed on a Customer's behalf, the Customer is responsible for providing required notices and establishing lawful authority, including obtaining any required consent; Merinio remains responsible for its own obligations under applicable law.

3. Collection of personal information

3.1. User Information

We collect personal information that you provide directly to us through the interface of the Merinio Service (for example, by filling out a form or by populating your profile) or otherwise, that our Customer (in most cases your employer) provides to us or that another User (in most cases your co-worker or immediate supervisor) uploads to the Merinio Service with respect to you.

Collected information may include the data described below:

- 3.1.1. Name
- 3.1.2. Contact Information (email, phone number, address)
- 3.1.3. Employment Information (work schedule, job title, skills, seniority)
- 3.1.4. Schedule information (hours worked, time of arrival, absences, etc)
- 3.1.5. Messages sent through the Merinio Service, time a message is received

Our Customers ultimately control what personal information is collected through the Merinio Service. Customers may create personalized data fields or use the Merinio Service in a manner that allows the collection of additional data.

We automatically collect technical information when Users interact with the Merinio Service, which may include:

- 3.1.6. Device Information (operating system, language, device ID)

- 3.1.7. The IP address from which your device accesses the Merinio Service;
- 3.1.8. Browsing and clickthrough data such as the number of connections to the Merinio Service, date and duration of a session, features used;
- 3.1.9. Web page from which you accessed the Merinio Service;

3.2. Visitor Data

We collect the information that you provide directly to us (for example, by filling out a form) through the Website interface or otherwise. This information may include the data described below:

- 3.2.1. Name
- 3.2.2. Contact Information (email, phone number)
- 3.2.3. Content of communications you send to us

We automatically collect technical information when Visitors interact with the Website or other digital content we provide. Such information may include:

- 3.2.4. Device Information (operating system, language, device ID)
- 3.2.5. The IP address from which your device accesses the Website;
- 3.2.6. Browsing and clickthrough data, such as pages viewed, number of connections to the Website, duration of a session, dates of connections to the Website, products viewed, page from which access to the Website is obtained;

3.3. Data from analysis tools

When you access the Website, we may use analytics tools such as Google Analytics to understand Website use, subject to applicable consent requirements. Reports may be aggregated, but the collection or use of device identifiers and browsing data may still involve personal information. Google provides a browser opt-out add-on at <https://tools.google.com/dlpage/gaoptout>.

3.4. Tracking technologies

We use browser cookies and other tracking technologies to support the Website and Merinio Service, personalize the Website and deliver advertisements based on Website traffic, subject to applicable law and required consent. Cookies are small files stored on your device by our servers or third-party servers. They may recognize a device, remember preferences or record browsing activity. Some last for a session; others remain until their expiry or deletion. Cookie identifiers and related information may identify you directly or indirectly, including when a supplier combines them with other information. Browser settings can limit or delete cookies, but do not replace any consent or opt-out mechanism required by law.

4. Processing of personal information

We process personal information collected through the Website and the Merinio Service for the purposes described below.

4.1. Communication with Visitors

We use Visitor Data you provided (such as your name and email address) to send you communications about our company, products and promotions, but only if you agree to receive marketing communications from us. We comply with all applicable regulations regarding unsolicited emails. If you no longer wish to receive electronic communications from us, you may notify us at any time by writing to us at privacy@merinio.com.

4.2. Operation of the Merinio Service

We use User Data to identify Users and allow our Customers to use the Merinio Service to manage human resources. For instance, we may be instructed by our Customer to:

- 4.2.1. use your contact information to route messages from our Customer or from other Users to you;
- 4.2.2. use data about your availability and professional skills to prepare a customized work schedule;
- 4.2.3. aggregate information from the Merinio Service to prepare customized reports about employee absenteeism;

4.3. Personalization of our services and Website

We use Visitor Data to offer you content that corresponds to your situation or interests. For example, the home page of the Website may be displayed according to your language preferences and the products and services displayed may be different depending on your geographic location.

4.4. Maintenance and Security

We use User Data under the Customer's instructions to secure, maintain and troubleshoot that Customer's Merinio Service. Product improvement using information derived from User Data is limited to lawfully anonymized data as described above. We use Visitor Data and Website analytics to maintain and improve the Website and prevent misuse, subject to applicable consent and other legal requirements.

4.5. Personalized marketing and retargeting

We may use Visitor Data to customize our advertising campaigns based on certain criteria, such as your subscription to our newsletter, your interest in our products and services, and navigational data, such as the pages you visited or the products you searched for or viewed on the Website. This data allows us to target audiences to partners offering advertising services. User Data is not used for this purpose.

5. Personal Data storage and retention

5.1. User Data

Merinio is headquartered in Canada. User Data may be stored or accessed in the countries identified for the applicable services in the Subprocessor Register, subject to the Customer's Data Processing Agreement and any more restrictive location commitment in the Order Form. Published vendor location options are distinguished in the register from Merinio's verified account configuration; a possible location is not automatically an authorized location.

Processing locations may be outside Québec or your province, state or country of residence. Information processed in another jurisdiction may be subject to that jurisdiction's laws and lawful access by its authorities. Where required, transfers are subject to privacy impact or transfer assessments and appropriate contractual safeguards. Changes remain subject to the applicable Data Processing Agreement, including its notice, objection and amendment requirements.

We retain User Data based on the instructions of our Customers, or if we are authorized by applicable law to retain User Data.

5.2. Visitor Data

Visitor Data is hosted on systems located in Canada or the United States. We retain Visitor Data until you request that we destroy it, or until our business no longer requires us to retain it. We do not undertake to retain Visitor Data for any period of time.

6. Security Measures

User Data and Visitor Data are hosted on servers operated by our service providers and are protected by security measures proportionate with the sensitivity of the data against unauthorized access.

Our employees and suppliers are informed of the confidential nature of personal information collected through the Merinio Service or Website and are made aware of the appropriate security measures to prevent unauthorized access to personal information.

7. Disclosure of Personal Information

We share or disclose personal information for the purposes and with the categories of recipients described below only where authorized by applicable law, including with consent where required or under a permitted exception. Describing a disclosure in this Privacy Statement does not itself authorize it.

7.1. Employees

Personal data is accessible to our officers and employees who must access it in order to use the same as set forth in this Privacy Statement and to provide our services to our Customers.

7.2. Customers

All User Data is available to the relevant Customer. Any personal information that is entered into the interface of the Merinio Service is shared with the relevant Customer.

7.3. Service Providers

We use service providers for hosting and databases; email, text messages and calls; customer support, technical troubleshooting and analytics; document storage and collaboration; project and service-delivery management; address-to-coordinate geocoding; customer training and support videos; bug-ticket management; and AI-assisted work involving customer information. Any processing of User Data through those tools remains subject to the Customer's instructions, the

Data Processing Agreement and applicable law. Service providers receive only the information needed for the authorized services and must protect it under appropriate written terms.

Providers that process User Data on our Customers' behalf are identified in the Subprocessor Register linked below. The applicable Data Processing Agreement governs subprocessor engagement and change notices. The register covers processing on Customers' behalf; other disclosures described in this Privacy Statement remain governed by their respective purposes and applicable law.

<https://merinio.com/legal>

7.4. Legal obligations

We may also disclose personal information to third parties if expressly permitted or required to do so by law, or if we are compelled to do so by a competent authority. We may disclose personal information in connection with legal proceedings if necessary to protect our rights or those of our Customers.

7.5. Transfer of business

Personal information may be disclosed in connection with a proposed sale, financing, restructuring or other business transaction only as permitted by applicable law and to the extent necessary for that transaction. Recipients must protect the information and restrict its use and disclosure under appropriate written terms. If the transaction does not proceed, information must be returned or destroyed as required by applicable law. If it proceeds, any continuing use, disclosure and notice to affected individuals must comply with applicable law.

8. What are your rights regarding your personal information?

When we process your personal information on behalf of our Customers, you must in most cases contact the relevant Customer (in most cases your employer) to exercise your rights in connection with your personal information processed by Merinio. When this situation applies, we will forward your requests to our Customer.

8.1. Access your data

You may access User Data through your user account on the Merinio Service. If you wish to access User Data not accessible through the interface of the Merinio Service, you may contact our Customer administering your account (in most cases your employer).

If you would like to access other personal information (such as Visitor Data) we hold about you or to have inaccurate personal information modified in our files, you may make a written request at privacy@merinio.com.

We will respond to your request promptly (within 30 days of receipt). Where applicable law provides a right to data portability, you may also request an eligible copy in a commonly used, structured technological format, or transmission to another recipient where the law permits.

Requests concerning User Data should be addressed to the relevant Customer; requests about information Merinio processes for its own purposes may be sent to privacy@merinio.com. Eligibility, verification and statutory exceptions apply.

8.2. Withdrawal of Consent

Your browser allows you to withdraw your consent to certain processing of Visitor Data, in particular by preventing the recording of browser cookies.

To withdraw consent beyond the controls available through the Website or your browser, write to privacy@merinio.com. For User Data processed on behalf of a Customer, contact that Customer. Withdrawal applies to processing that relies on consent and may affect a feature that requires the information; we or the Customer will explain the relevant consequences. It does not require unrelated services to stop, and it does not prevent processing or retention that remains required or permitted by applicable law.

8.3. Deletion

You may in certain circumstances have the right to request the deletion of personal information that we hold about you when its collection was not authorized. To make such a request, please write to us at privacy@merinio.com. We will respond to your request as soon as possible (no later than 30 days after receipt).

If you continue to use the Website or the Merinio Service, we will again collect certain personal information about you.

8.4. Complaint

Depending on your jurisdiction of residence, you may have the right to file a complaint regarding the processing of your personal information with a supervisory authority responsible for the protection of privacy.

Merinio is subject to applicable privacy laws in Québec and Canada and to the jurisdiction of the competent privacy authorities. Nothing in this Privacy Statement limits a right under applicable law to contact a supervisory authority or pursue a remedy in another competent jurisdiction.

8.5. Identity validation

We may verify the identity of individuals asking to exercise their rights with respect to their personal information. Any information collected to perform this verification will not be used for any other purpose.

9. Modifications

We may modify this Privacy Statement from time to time to reflect changes in our personal information processing practices. If a modification is made, the new statement will be available through the Merinio Service and on the Website at the following address:

<https://merinio.com/legal>

We will provide notice of material changes as required by applicable law, using an appropriate channel, which may include email where we have your address. A revised Privacy Statement does

not itself supply consent for a new purpose or replace any acceptance required to amend a Customer's Data Processing Agreement.

10. Additional Information

For any additional information with respect to our processing of personal information, you may contact us at the address indicated at the beginning of this Privacy Statement.