

# **We care about keeping your information private. We observe careful data handling practices company-wide.**

## **SILVER GOLD BULL PRIVACY POLICY**

Last Updated: August 28, 2024

This Privacy Policy describes how Silver Gold Bull Inc. ("Company," "we," "us," "our") collects, uses, stores, and shares your information when you (1) visit, use or otherwise access our website silvergoldbull.ca, silvergoldbull.com or any other website offered by us that links to this privacy policy ("Website"); (2) you use our products and services ("Services"); (3) you communicate with us in any manner, including by email, direct messaging, text message, telephone, and/or in person ("Communications"); and (4) we interact with certain third party partners.

If you are a California resident please see the Sections entitled "Your Legal Rights" and "Additional Disclosures for California Residents Under the CCPA" below.

If you are resident of Virginia, Colorado, or Connecticut please see the Section entitled "Your Legal Rights" and "Disclosures for Virginia, Colorado, and Connecticut Residents" below.

If you are a resident of the European Economic Area ("EEA") or the United Kingdom ("UK"), please see the Sections entitled "Your Legal Rights" and "Additional Disclosures EEA and UK Residents" below.

### **1. Information We Collect About You**

Depending on how you interact with our Websites and Services, the nature of our Communications, and how we may interact with certain third party partners, we may collect the following pieces of your information:

- **Basic Identifying Information.** Information you provide when you sign-up for an account for our Services such as your full name, postal address, e-mail address, telephone number, password, social insurance/security number, and other similar identifiers.
- **Device Identifier and other Unique Identifiers.** Information such as your device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, and other unique identifiers.
- **Payment Information.** Information you provide to make purchases including credit card or payment card information, bank account and other financial information.
- **Internet or Other Network Activity.** Information such as your browsing or search history, and other information regarding your interactions with our Websites and Services and advertisements, and Communicate with U.
- **Commercial Information.** Information such as the products and samples you have purchased and considered, delivery address, billing address, information that may be required by customs agents and related information about your commercial activities.
- **Demographic Information.** Information such as your age, gender, and date of birth.
- **User Content.** Information such as your Communications with us and any other content you provide, such as survey responses, comments, testimonials, and other content.
- **Inferences.** Information such as inferences drawn from or created based on the information identified above.

### **2. How We Collect Information**

We collect your information in three ways: (a) directly from you when you use our Website, Services, advertisements or otherwise engage in Communications with us; (b) automatically using online technologies when you engage with our Website, Services, and Communications; and (c) from our third party partners.

#### 1. Information You Provide Directly to Us

The information we collect on or through our Website or Services may include: (a) information that you provide by filling in forms on our Website or Services, including information provided at the time of registering to use our Website, placing an order through our Website, requesting further services or reporting a problem with our Website or Services; (b) records and copies of your correspondence (including email addresses and voice call details), if you contact us; and/or (c) details of transactions you carry out through our Website and Services and of the fulfillment of your orders, as you may be required to provide financial information such as credit card or payment information before placing or during the placement of an order through our Website or Services. We may also request and collect from you information needed to verify your identity for the purposes of preventing fraud, either at the time of order or following the placement of your order, including for example proof of address or photo identification.

#### 2. Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website or Services or click on links within Communications we send you, or when you interact with our advertisements, we or other third parties may automatically collect certain information about you using data collection technologies such as cookies, pixels, web beacons, software developer kits, and related technologies. For more information regarding the use of these technologies please see the section entitled "Cookies and Other Tracking Technologies" below.

#### 3. Information We Collect From Third Parties.

We collect information from our third party partners, data analytics providers, marketing or advertising providers, fraud prevention service providers, and vendors that provide services.

### **3. Cookies and Other Tracking Technologies**

For more information about how we use cookies and related tracking technologies, please see the Silver Gold Bull Cookie Policy.

### **4. How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information, for a variety of purposes:

- **Provide our Websites and Services to You.** We use your information to provide our Websites and Services to you, including to: (a) create and manage your account when you sign-up to use our Services; (b) facilitate your access and use of our Websites; (c) process your receipts and feedback on products to facilitate your participation in the Services; (d) send you notifications relating to your account and participation in our Services; (e) answer your Communications; and (f) perform other related business functions.
- **Communicate with You.** We use your information to engage in Communications with you, such as to respond to your requests, inquiries, issues, feedback, and to provide customer service.
- **Market and Advertise.** We use your information for marketing and advertising purposes, including sending marketing, advertising, and promotional communications to you regarding our Services by email, text message (including SMS, MMS, and RCS messaging formats), or postal mail. We also use your information to show you advertisements for Services and to administer our sweepstakes and other contests. We do not share your mobile telephone information with third parties or affiliates to enable the sending of text messages for marketing, advertising, or promotional purposes.
- **Conduct Analytics and Personalization.** We use your information to conduct research and analytics, including to improve our Websites and Services. We also use your information to understand your interaction with our Websites, advertisements, Services, and our Communications with you. We also use your information to personalize your experience, to save you time when you visit our Websites and use our Services, to better understand your needs, and to provide personalized recommendations for our Services.
- **Security and Fraud Prevention.** We use your information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions. We also use your information to enforce our terms and procedures, prevent against security incidents, and prevent harm to other users of our Services.
- **Legal Obligations.** We use your information to comply with our legal and regulatory obligations, to establish and exercise our rights, and to defend against legal claims.
- **Business Functions.** We use your information to support our core business functions, including to maintain records related to business management, loss prevention, collecting amounts owed, and identifying and repairing errors or problems in the Website or Services.

### **5. Disclosure of Your Information**

We share information we collect in accordance with the practices described in this Privacy Policy. The types of entities we may have shared information with or may share information with in the future include the following:

- **Unaffiliated Vendors.** We generally share information with entities that process information on our behalf for our business purposes. Service providers assist us with services such as payment processing, development, web hosting, operations, sales, support, data analysis and marketing. In limited circumstances, we may share information with a vendor for business and commercial purposes, including analytics and advertising technology companies that may use such information for their own purposes. In such instances, the Vendor may, in certain contexts, independently decide how to process your information.
- **Affiliates.** We share information with our related entities including our parent and sister companies for business purposes such as customer support, product development, and technical operations. We also may share information with affiliates for commercial purposes.
- **Third Parties.** We share information with third parties in the following instances:
  - **Related To Merger or Acquisition:** We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition, business combination of all or any portion of our business or assets, change of control, or a transfer of all or a portion of our business or assets to another third party (including in the case of any bankruptcy proceeding).
  - **Related To Security and Compelled Disclosure:** We share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information to protect the rights, property, life, health, security and safety of us, the Website, Service or anyone else.
  - **Facilitating Requests:** We share information at your request or direction, such as when you choose to share information with a social network about your activities on the Services.
  - **Consent.** We will not share information with additional third parties without notice to you and without your consent. For example, we will not share your mobile telephone information with third parties or affiliates to enable the sending of text messages for marketing, advertising, or promotional purposes.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the "User Controls and Choices" section below.

## 6. User Controls and Choices

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

### 1. Account Information

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings or sending an email to the email address set out in the "Contact Information" section below with the word PRIVACY in the subject field of the email. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### 2. Tracking Technology Choices

- Cookies and Pixels. Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.
- Do Not Track. Some browsers support a "Do Not Track" feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Our Website and Services do not currently change the way they operate based upon detection of a "Do Not Track" or similar signal. For more information on "Do Not Track," visit <http://www.allaboutdnt.com>.

### 3. Analytics and Internet-Based Advertising

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities' statements regarding their opt out options or programs.

### 4. Communications

- E-mails. You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in our email to click on the unsubscribe link, or emailing us at the email address set out in the "Contact Information" section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or Company's ongoing business relations.
- Text Messages and Calls. You can opt-out of receiving text messages or calls to your phone number at any time by (i) for text messages (including SMS, MMS, and RCS messaging formats), texting "STOP" in response to any text message you receive from us, or contacting us as set out in the "Contact Information" section below and specifying you want to opt-out of text messages; and (ii) for calls, requesting opt-out during any call you receive from us, or contacting us as set out in the "Contact Information" section below and specifying you want to opt-out of calls. Please see our "Text Messaging Terms of Service" for more information.

Please note that your opt out is limited to the email address, device, and phone number used and will not affect subsequent subscriptions.

### 5. Additional Legal Rights for Certain Residents

If you are a resident of California, Virginia, Colorado, Connecticut, Utah, the EEA or the UK, then you may have certain legal rights under a respective applicable laws including the California Consumer Privacy Act ("CCPA"), the Virginia Consumer Data Protection Act ("VCDPA"), the Colorado Privacy Act (CPA), the Connecticut Data Privacy Act ("CDPA"), Utah Consumer Privacy Act ("UCPA"), Europe's General Data Protection Regulation ("GDPR") and the United Kingdom's Data Protection Act of 2018 ("UKDPA"). Please see the section entitled "Additional Legal Rights to Certain Residents" below for more information about any applicable legal rights.

## 7. Data Security and Data Retention

We have implemented measures including reasonable policies, procedures, and other physical, technological and organizational safeguards designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website or Services.

We keep your information for as long as is necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to the nature of the information subject to disposal.

## 8. Links to Third Party Sites

Our Websites and Services may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review.

## 9. Additional Legal Rights to Certain Residents

THIS SECTION ONLY APPLIES TO THOSE RESIDENTS OF JURISDICTIONS WHERE SUCH APPLICABLE LAWS APPLY. IF YOU ARE NOT A RESIDENT OF SUCH JURISDICTION, THIS SECTION DOES NOT APPLY TO YOU.

Applicable laws require specific disclosures to residents of the applicable jurisdiction such law applies to, as well as providing such residents certain rights in connection with the personal information. If you are a resident of California, Virginia, Colorado, Connecticut, the EEA or the UK this section provides the specific disclosures required under such applicable laws including how to exercise privacy rights.

## 1. Your Legal Rights

Your Rights: If you are a resident of California, Virginia, Colorado, Connecticut, Europe or the United Kingdom the following rights apply to you:

- **Right to Know.** You have a have a right to request that we disclose, subject to certain exceptions, information concerning: (1) the categories of personal information we have collected from or about you; (2) the categories of sources from which we have collected that personal information, and the business or commercial purpose for the collection; (3) the categories of third parties with whom we have shared, sold, or disclosed your personal information, including the business or commercial purpose for said sharing, selling, or disclosure; and (4) specific pieces of your personal information, subject to appropriate exceptions.
- **Right to Delete.** In certain circumstances, you have the right to request the deletion of your personal data, except information we are required to retain by law, regulation, or to protect the safety, security, rights, and integrity of Silver Gold Bull. For instructions on how to submit a request to delete your personal information, see below Exercising Your Rights. When the right to delete your personal data has been processed, all of your personal data, except for data we are required to retain by law and regulation, will be removed from our systems.
- **Right to Correct.** You have a right to request that we correct your personal information, subject to certain exceptions.
- **Right to Opt-Out of the Sale or Sharing of Personal Information, or Use of Personal Information for Targeted Advertising.** Certain of our online tracking technologies may be considered a "sale" or a "share" of your information to third parties under applicable laws, or may be considered "targeted advertising" under applicable laws. Visitors to our Websites or Services can therefore opt-out of being tracked by these technologies by clicking "Do Not Sell or Share My Personal Information" in the footer of our Website or in the cookie banner. Please note, selecting "Do Not Sell or Share My Personal Information" will result in a cookie being placed on your browser that prevents any advertising or analytics cookies from being set for 1 year. If you reset your browser, or visit from a new device, this setting may not be recognized. We have no actual knowledge that we sell the personal information of California residents who are under 16 years of age. You may also exercise your right to opt-out by using an opt-out preference signal, such as the Global Privacy Control (GPC) on your browser. To download and use a browser supporting the GPC, you may [click here](#). If you choose the GPC signal, you will need to turn it on for each supported browser or browser extension you use.
- **Right to Non-Discrimination.** You have a right to exercise the above rights without being discriminated against.
- **Right to Appeal.** Depending on where you live, you may have a right to appeal our denial of any request above. We will respond to your appeal within the timeframe required by law, and provide a written explanation in support of our response and provide additional information as required by law. You may exercise your right to appeal by sending an e-mail to [privacy@silvergoldbull.com](mailto:privacy@silvergoldbull.com) with the word PRIVACY in the subject field of the email.

Exercising Your Rights. If you would like to manage, change, limit, correct, or delete your personal data, you can do so by sending an e-mail to [privacy@silvergoldbull.com](mailto:privacy@silvergoldbull.com) with the word PRIVACY in the subject field of the email. You may also designate an authorized agent to submit a request on your behalf by sending an e-mail with written proof of such authorization to [privacy@silvergoldbull.com](mailto:privacy@silvergoldbull.com) with the word PRIVACY in the subject field of the email. Once you contact us to exercise any of your rights, we will confirm receipt of your request. Depending on your request, we will ask for information such as your name, or an e-mail address that you have used with Company. For certain requests, we may also ask you to provide details about the most recent use of the Services, including but not limited to your most recent purchase. If we are unable to verify your identity, we may deny your requests to know or delete.

Authorized Agents. Certain laws including the CCPA, CPA and CDPA allow you to designate an authorized agent to submit a request on your behalf to access or delete your personal information. To do so, you must: (1) provide that authorized agent written and signed permission to submit such request; and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

Company's Response To Requests. Requests properly submitted will be responded to within the required period under applicable law. If a request is deficient, we may deny the request but will use reasonable efforts to explain the deficiency in the request so that you may correct the request. Please note that we may charge a reasonable fee for multiple requests in the same 12-month period, as permitted by applicable law.

## 2. Additional Disclosures for California Residents

### I. CCPA Notice of Collection

- To learn more about the categories of personal information we collect about California residents, please see the section entitled "Information We Collect About You" above.
- For more information about how we use those categories of personal information, please see the section entitled "How We Use Your Information" above.
- For more information about how we collect categories of personal information, please see the sections entitled "How We Collect Information" and "Third Party Use of Cookies And Other Tracking Technologies" above.

- To learn more about how we disclose categories of personal information, and the categories of third parties with whom we disclose such information, please see the section entitled "Disclosure of Your Information" above.
- To learn more about how long we keep your information, please see the section entitled "Data Security and Data Retention" above.

## II. CCPA Notice of Disclosure for a Business Purpose

To learn more about the categories of personal information we have disclosed for a business purpose, and the categories of third parties with whom we've disclosed such information, please see the sections entitled "How We Use Your Information" and "Disclosure of Your Information" above.

## III. CCPA Notice of Sale or Sharing of Personal Information

Certain of our online tracking technologies may be considered a "sale" or a "share" of your information to third parties under the CCPA. The categories of personal information we may "sell" or "share" in these circumstances includes your IP address, persistent online identifiers, ad identifiers, similar information about your devices and browsers, and information about your engagement with our Websites, Services, and Communications. We have no actual knowledge that we sell the personal information of California residents who are under 16 years of age.

## IV. CCPA Notice of Use of Sensitive Personal Information

We do not use California resident sensitive personal information for any purpose other than is permissible under the CCPA. Specifically, we do not use sensitive personal information of California residents to derive characteristics about California residents.

### 3. Additional Disclosures For Virginia, Colorado, and Connecticut Residents

#### Notice of Collection

- To learn more about the categories of personal information we collect about California residents, please see the section entitled "Information We Collect About You" above.
- For more information about how we use those categories of personal information, please see the section entitled "How We Use Your Information" above.
- For more information about how we collect categories of personal information, please see the sections entitled "How We Collect Information" and "Third Party Use of Cookies And Other Tracking Technologies" above.
- To learn more about how we disclose categories of personal information, and the categories of third parties with whom we disclose such information, please see the section entitled "Disclosure of Your Information" above.

### 4. Additional Disclosures For EEA and UK Residents

Data protection laws in Europe distinguish between organizations that process personal data for their own purposes (known as "controllers") and organizations that process personal data on behalf of other organizations (known as "processors").

Company acts as a controller with respect to personal data collected as you interact with our Websites and Services, or otherwise engage in any Communications with us.

## V. Lawful Basis for Processing

Data protection laws in Europe require a "lawful basis" for processing personal data. Our lawful bases include where:

- (a) you have given consent to the processing for one or more specific purposes, either to us or to our service providers or partners;
- (b) processing is necessary for the performance of a contract with you;
- (c) processing is necessary for compliance with a legal obligation; or
- (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

## VI. Data Transfers

Data processing and retention occurs by us in the United States and Canada. If your data is collected in Europe from a third party we will transfer your personal data subject to appropriate safeguards, such as Standard Contractual Clauses or appropriate derogations where applicable.

## VII. Complaints

If you have a complaint about our use of your personal data or response to your requests regarding your personal data, you may submit a complaint to the data protection regulator in your jurisdiction. We would, however, appreciate the opportunity to address your concerns before you approach a data protection regulator, and would welcome you directing an inquiry first to us.

In addition to the contact information above, please contact our:

European Representative: [privacy@silvergoldbull.com](mailto:privacy@silvergoldbull.com)

Data Protection Officer: [privacy@silvergoldbull.com](mailto:privacy@silvergoldbull.com)

## 10. Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by updating our Privacy Policy on the Website. Any changes will be automatically effective after 30 days of update on the Website. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

### **11. Children**

Our Websites and Services are not intended for children under the age of 13. This includes any links to other websites that we provide for our convenience. We don't knowingly collect the information of children under 13 for any reason.

### **12. Accessibility**

To print a copy of this Privacy Policy, please [click here](#).

If you require a copy of this Privacy Policy in an alternative format, please contact us at [privacy@silvergoldbull.com](mailto:privacy@silvergoldbull.com) or otherwise via the contact information provided in the section titled "Contact Information" below.

### **13. Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Canadian residents:

[silvergoldbull.ca](http://silvergoldbull.ca)

Silver Gold Bull

888 - 3rd ST SW

10th Floor - West Tower

CALGARY AB

T2P 5C5

CANADA

US Residents:

[silvergoldbull.com](http://silvergoldbull.com)

Silver Gold Bull

2780 So. Jones Blvd.

#200-3841

Las Vegas Nevada

89146

US

German residents:

[silvergoldbull.de](http://silvergoldbull.de)

Silver Gold Bull

Kurfürstendamm 195

3. Stock

Berlin

10707

Deutschland

Others:

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