

PRIVACY POLICY

Credium Group Inc.

Last Updated: December 22, 2025

1. INTRODUCTION

This Privacy Policy sets forth the principles and practices governing how **Credium Group Inc.** (“we,” “us,” or “our”) collects, accesses, uses, discloses, stores, safeguards, and otherwise processes Personal Information obtained through our website, landing pages, digital platforms, online forms, advertising interfaces, and related services (collectively, the “**Website**”).

We operate a digital education and marketing platform serving business owners globally, including Arabic-speaking audiences. In the course of our operations, we may collect and process Personal Information for legitimate business, operational, and marketing purposes. We are committed to ensuring that such processing is conducted in a lawful, fair, transparent, and proportionate manner, and that appropriate technical and organizational measures are implemented to protect Personal Information against unauthorized access, misuse, loss, or disclosure.

This Privacy Policy is intended to comply with, and shall be interpreted in accordance with, applicable privacy and data protection laws, including without limitation:

- **Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA)** and its underlying fair information principles;

- The **General Data Protection Regulation (GDPR)**, where applicable to individuals located in the European Union;
- The **California Online Privacy Protection Act (CalOPPA)**, where applicable to California residents.

By accessing or using our Website, or by submitting Personal Information to us by any means, **you acknowledge that you have read, understood, and agreed to the terms of this Privacy Policy**, subject to your statutory rights under applicable law.

2. DEFINITIONS AND INTERPRETATION

For the purposes of this Privacy Policy, and unless the context otherwise requires, the following terms shall have the meanings set out below:

- **“Company,” “we,” “us,” or “our”** means **Credium Group Inc.**, a corporation incorporated under the laws of Canada, with its principal place of business at 9131 Keele St, Suite A4, Vaughan, Ontario, Canada L4K 0G7.
- **“Website”** means all websites, domains, subdomains, landing pages, applications, and other digital properties operated, owned, or controlled by us, including <https://credium.ca>, whether accessed via desktop, mobile, or other devices, and including any future versions or replacements.
- **“User,” “you,” or “your”** means any natural person who accesses, browses, visits, interacts with, or otherwise uses the Website, or who submits information to us directly or indirectly.
- **“Personal Information”** means any information relating to an identified or identifiable individual, including but not limited to name, email address, telephone number, IP address, online identifiers, device identifiers, or any

other information that constitutes “personal information” or “personal data” under applicable privacy or data protection laws.

- **“Processing”** means any operation or set of operations performed on Personal Information, whether or not by automated means, including collection, recording, organization, structuring, storage, use, disclosure, transmission, transfer, retention, anonymization, or deletion.
- **“Services”** means all digital education programs, marketing-related content, communications, downloadable materials, automated emails, tools, resources, and related services provided or made available by us through the Website or otherwise.
- **“Third-Party Service Providers”** means external vendors, contractors, or platforms engaged by us to support Website functionality, analytics, advertising, communications, automation, or operational services, including without limitation **ActiveCampaign**.
- **“Tracking Technologies”** means cookies, pixels, tags, scripts, SDKs, and similar technologies used to collect information regarding Website usage and user behavior, including without limitation **Facebook Pixel, Google Tag Manager, WhatsApp API, Hotjar**, and comparable tools.

Headings are included for convenience only and shall not affect the interpretation of this Privacy Policy. References to “including” or “includes” shall be construed as “including without limitation.” Words importing the singular include the plural and vice versa.

3. SCOPE AND APPLICATION

This Privacy Policy applies to all Personal Information collected or processed by us in connection with:

- Visitors to and users of the Website and associated landing pages;
- Individuals who submit Personal Information through online forms, lead-generation tools, or other electronic means;
- Users who receive emails, PDF materials, automated communications, newsletters, or marketing messages from us.

This Privacy Policy applies irrespective of the geographic location from which the Website is accessed, subject to the mandatory application of local data protection laws where applicable.

4. PERSONAL INFORMATION WE COLLECT

4.1 Information You Provide Voluntarily

We may collect Personal Information that you voluntarily provide when interacting with the Website or Services, including without limitation:

- Full name;
- Email address;
- Telephone number;
- Any additional information you choose to submit through forms, inquiries, registrations, or direct communications.

You acknowledge that the provision of such information is voluntary; however, failure to provide certain information may limit your ability to access specific content, features, or communications.

4.2 Automatically Collected Information

When you access or use the Website, we may automatically collect certain technical, usage, and interaction data, including without limitation:

- Internet Protocol (IP) address;
- Browser type, device type, and operating system;
- Pages visited, time spent on pages, navigation patterns, and interaction data;
- Referring URLs and general location information derived from IP addresses.

Such information is collected for purposes including security, analytics, functionality, and performance optimization, and may be aggregated or anonymized where appropriate.

5. METHODS OF COLLECTION

Personal Information is collected by us through lawful and transparent means, including without limitation:

- **Online Forms and Submissions:**

Personal Information provided voluntarily by you through forms embedded on our Website, landing pages, lead-generation interfaces, registration fields, or other electronic submission mechanisms.

- **Third-Party Platform Integrations:**

Personal Information collected and processed through integrations with third-party platforms used for communications, marketing automation, and customer relationship management, including **ActiveCampaign**, in accordance with applicable data protection laws and contractual safeguards.

- **Cookies and Tracking Technologies:**

Information collected automatically through the use of cookies, pixels, tags,

scripts, and similar Tracking Technologies deployed on the Website to support functionality, analytics, advertising, and marketing activities.

Where required by applicable law, we obtain your consent prior to collecting Personal Information through non-essential technologies or integrations.

6. PURPOSES OF PROCESSING

We collect and process Personal Information solely for legitimate business purposes and in accordance with applicable legal bases, which may include consent, contractual necessity, compliance with legal obligations, or our legitimate interests. Such purposes include, without limitation:

- To provide access to digital education programs, marketing content, and related resources made available through the Website;
- To deliver automated emails, downloadable materials (including PDFs), newsletters, and marketing communications;
- To respond to inquiries, requests, or support communications submitted by you;
- To monitor, analyze, and improve Website performance, functionality, and user experience;
- To conduct advertising, analytics, retargeting, and remarketing campaigns across third-party platforms.

Personal Information shall not be processed in a manner incompatible with the purposes described above, except as otherwise permitted or required by applicable law.

7. MARKETING COMMUNICATIONS

By submitting your Personal Information through the Website or related forms, you expressly acknowledge and consent to receiving automated emails, educational materials, newsletters, and marketing communications from us, subject to applicable legal requirements.

You retain the right to withdraw your consent and opt out of marketing communications at any time by:

- Using the unsubscribe mechanism provided in the relevant communication; or
- Contacting us directly at info@credium.ca

Withdrawal of consent shall not affect the lawfulness of any processing carried out prior to such withdrawal, nor shall it affect communications that are transactional, operational, or legally required.

8. TRACKING TECHNOLOGIES AND COOKIES

We use Tracking Technologies to support Website functionality, analytics, security, and marketing efforts. Such technologies may include, without limitation:

- **Facebook Pixel**
- **Google Tag Manager**
- **WhatsApp API**
- **Hotjar**
- Comparable analytics, advertising, and performance-monitoring tools

These technologies may collect information regarding your interactions with the Website, including pages visited, actions taken, and engagement patterns.

Where required by applicable law, including under GDPR and similar regulations, we obtain your prior consent before deploying non-essential cookies or Tracking Technologies. You may manage or disable cookies through your browser settings or through consent management tools made available on the Website; however, disabling certain technologies may affect Website functionality or user experience.

9. DISCLOSURE OF PERSONAL INFORMATION

We **do not sell, rent, or trade** Personal Information to third parties for monetary or commercial consideration.

We may disclose Personal Information strictly on a limited and lawful basis, including:

- **Third-Party Service Providers:**

To trusted Third-Party Service Providers engaged by us solely for operational, technical, analytical, communications, marketing automation, or support purposes, and only to the extent necessary for such providers to perform services on our behalf. Such providers are contractually required to safeguard Personal Information and to process it in a manner consistent with applicable data protection laws.

- **Legal and Regulatory Requirements:**

Where disclosure is required or permitted by applicable law, regulation, court order, subpoena, or lawful request by a governmental or regulatory authority.

- **Protection of Rights and Interests:**

Where disclosure is reasonably necessary to protect our legal rights, enforce

our agreements, investigate potential violations, prevent fraud or security threats, or protect the safety, property, or rights of us, our users, or others.

Any disclosure of Personal Information shall be limited to what is reasonably necessary for the applicable purpose.

10. DATA RETENTION

We retain Personal Information only for as long as is reasonably necessary to fulfill the purposes for which it was collected, as outlined in this Privacy Policy, or as otherwise required or permitted by applicable law.

Retention periods may vary depending on:

- The nature and sensitivity of the Personal Information;
- The purposes for which it was collected and processed;
- Applicable legal, regulatory, or contractual obligations.

When Personal Information is no longer required, we take reasonable steps to ensure that it is securely deleted, anonymized, or otherwise rendered inaccessible, in accordance with industry standards and legal requirements.

11. DATA SECURITY

We implement and maintain reasonable **administrative, technical, and physical safeguards** designed to protect Personal Information against unauthorized access, disclosure, alteration, misuse, or loss.

Such safeguards may include, without limitation:

- Access controls and authentication measures;
- Secure storage and transmission practices;
- Internal policies governing data access and handling.

While we take commercially reasonable steps to protect Personal Information, **no method of transmission over the internet or method of electronic storage is completely secure**. Accordingly, you acknowledge and agree that the submission of Personal Information is undertaken at your own risk, to the extent permitted by law.

12. YOUR RIGHTS

Depending on your jurisdiction and subject to applicable legal limitations, you may have certain rights in relation to your Personal Information, which may include the right to:

- Request access to the Personal Information we hold about you;
- Request correction or rectification of inaccurate or incomplete Personal Information;
- Request deletion or erasure of Personal Information, where legally permissible;
- Withdraw consent where processing is based on consent;
- Object to or restrict certain processing activities.

All requests must be submitted **in writing** to info@credium.ca. We will respond to valid requests within the timeframes required by applicable law and may require verification of identity prior to fulfilling any request.

13. INTERNATIONAL DATA TRANSFERS

As we operate and engage service providers on a global basis, Personal Information may be processed, accessed, or stored in jurisdictions outside your country of residence.

Where Personal Information is transferred across borders, we take reasonable steps to ensure that appropriate safeguards are in place to protect such information in accordance with applicable data protection laws, including contractual protections and security measures, where required.

14. CHILDREN’S PRIVACY

Our Website and Services are **not intended for, directed to, or permitted to be used by individuals under the age of eighteen (18)**, regardless of the age of majority in their jurisdiction of residence.

We do **not knowingly collect, use, process, or disclose Personal Information from any individual under the age of eighteen (18)**. Individuals under 18 years of age are strictly prohibited from submitting Personal Information through the Website, landing pages, forms, or any other means.

If we become aware, or have reason to believe, that Personal Information has been collected from an individual under the age of eighteen (18) without valid and legally sufficient parental or guardian consent (where applicable), we will take **prompt and reasonable steps** to:

- Delete such Personal Information from our records; and
- Prevent further collection or processing of such information.

If you believe that a minor under the age of eighteen (18) has provided Personal Information to us, please contact us immediately at info@credium.ca so that appropriate corrective action may be taken.

15. GOVERNING LAW

This Privacy Policy, and any dispute, claim, or matter arising out of or relating to it, including the collection, use, disclosure, or protection of Personal Information, shall be governed by and construed in accordance with the laws of the **Province of Ontario, Canada**, without giving effect to any conflict-of-laws or choice-of-law principles that would result in the application of the laws of any other jurisdiction.

16. LANGUAGE

The **English language version** of this Privacy Policy shall be the **sole legally binding and controlling version**.

Any translation of this Privacy Policy into another language is provided solely for convenience and informational purposes and shall have **no legal force or effect** in the event of any inconsistency or interpretation dispute.

17. CHANGES TO THIS POLICY

We reserve the right, in our sole discretion, to amend, update, or modify this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or operational needs.

Any changes shall become effective immediately upon posting the revised Privacy Policy on the Website, unless otherwise stated. Your continued access to or use of

the Website following the posting of any changes constitutes your acceptance of the updated Privacy Policy.

We encourage you to review this Privacy Policy periodically to remain informed of how we protect Personal Information.

18. CONTACT INFORMATION

If you have any questions, concerns, requests, or complaints regarding this Privacy Policy or our handling of Personal Information, you may contact us in writing at:

info@credium.ca

All privacy-related communications should be submitted using this email address. We will review and respond to inquiries in accordance with applicable data protection laws.