

Privacy Policy

Flex SC Technologies Inc.

Effective Date: August 16, 2026

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Flex SC Technologies Inc. (“**Flex**,” “**we**,” “**us**,” or “**our**”) respects your privacy and is committed to handling personal information responsibly, transparently and securely.

This Privacy Policy explains how Flex collects, uses, discloses, retains and protects personal information when you access or use the Flex mobile application, website and related services and technology (collectively, the “**Platform**”).

Flex operates a digital marketplace that connects businesses seeking flexible supply chain and logistics labour with individuals seeking shift-based work opportunities.

This Privacy Policy applies to:

- individuals who create or use Worker accounts (“**Workers**”);
- individuals who create or use accounts on behalf of businesses (“**Business Users**”); and
- other individuals who communicate with or otherwise interact with Flex.

Where applicable law requires consent for a particular collection, use or disclosure of personal information, Flex will seek that consent in an appropriate manner.

1. Personal Information We Collect

The personal information we collect depends on how you use Flex and which Platform features you use.

A. Account and Contact Information

When you create or maintain a Flex account, we may collect:

- your name;
- email address;
- telephone number;
- username or account identifier;
- profile photograph, if provided;

- city, region or preferred work area;
- account settings and preferences; and
- other information you choose to provide.

We may use email addresses and telephone numbers to verify accounts, authenticate users, communicate important account information and help protect Flex from fraud or misuse.

B. Worker Profile, Skills and Qualification Information

Workers may provide information used to create their Flex profile and connect them with work opportunities, including:

- work history and experience;
- warehouse, logistics and supply chain experience;
- skills and areas of experience;
- availability and scheduling preferences;
- preferred work locations;
- preferred job or shift types;
- qualifications, licences and certifications;
- equipment qualifications, such as forklift certification;
- training or safety credentials; and
- other information relevant to available opportunities.

Workers may upload copies, photographs or other evidence of certifications and credentials.

Unless Flex expressly indicates that a credential has been verified, the presence of a certification, licence or other credential on a Worker profile does not mean that Flex has independently confirmed its authenticity, validity or current status.

C. Business Account Information

If you use Flex on behalf of a business, we may collect:

- your name;
- business email address and telephone number;

- your role or position;
- company name;
- company and worksite addresses;
- staffing requirements;
- shift information;
- workplace requirements;
- Worker qualification requirements;
- billing and transaction information; and
- information relating to your interactions with Workers.

D. Applications, Matches and Shift Activity

When you use the Flex marketplace, we may collect information relating to your activity, including:

- opportunities viewed;
- applications, bids or claims;
- opportunities recommended or presented;
- accepted or declined opportunities;
- confirmed, cancelled or completed shifts;
- shift dates, times and locations;
- pay rates and other shift details;
- attendance and shift-completion information;
- communications relating to opportunities;
- transaction information;
- interactions between Workers and businesses; and
- Platform and shift history.

E. Ratings, Reviews and Performance Information

Flex uses a two-sided rating and reputation system designed to promote reliability, quality, transparency and accountability in the marketplace.

Businesses may provide ratings, reviews or feedback concerning Workers, including matters such as:

- attendance;
- reliability;
- skill level;
- teamwork;
- attitude;
- safety;
- work ethic;
- work performance; and
- overall experience.

Workers may provide ratings, reviews or feedback concerning businesses, including matters such as:

- workplace environment;
- communication;
- organization;
- safety; and
- overall experience.

Ratings, reviews, shift history and performance-related information may affect your reputation on Flex, future matching, recommendations, eligibility for particular opportunities and access to certain Platform features.

Flex may review ratings, reviews or performance information when there is a complaint, dispute, safety issue, suspected misuse or concern regarding accuracy or fairness.

F. Location Information

At launch, Flex may collect location information you provide, including:

- your city;
- preferred work area;

- postal or geographic area;
- worksite locations; and
- other location preferences.

We may use this information to show geographically relevant opportunities and help connect Workers with appropriate worksites.

Flex does not currently require continuous or precise GPS tracking.

Flex may introduce device-based location functionality as the Platform develops.

Before collecting precise device location for a new purpose, Flex will provide appropriate notice and request the applicable device permission or consent where required.

Device-based location may in the future be used to:

- show nearby opportunities;
- determine proximity between Workers and worksites;
- improve matching and recommendations; and
- support other location-dependent Platform features.

You will be able to manage applicable device-location permissions through your device settings.

2. Identity Verification and Background Screening

A. Certn

Flex uses **Certn** as a third-party provider for identity verification and background screening.

Where screening is required, Flex may provide Certn with information necessary to initiate the screening process, such as your name, email address or other account information.

Certn may then collect information directly from you as necessary to perform the requested screening.

Depending on the screening being performed, this may include:

- legal name and previous names;
- telephone number;

- date of birth;
- address and address history;
- place of birth;
- government-issued identification;
- photographs;
- information needed to verify your identity;
- criminal-history disclosures; and
- other information required to perform the applicable check.

The information requested will depend on the particular screening being performed.

B. Identity and Biometric Verification

Certn's identity-verification process may require you to provide a government-issued photo ID and a photograph or selfie.

Certn may use biometric technology to compare your photograph with the photograph contained on your identification in order to verify identity and help prevent fraud.

Biometric identity verification requires separate consent through Certn.

Flex's general acceptance of this Privacy Policy does not replace any separate biometric consent required by Certn.

Flex does not use biometric facial information for its own independent biometric-identification purposes.

Certn handles biometric information in accordance with its own privacy notices and applicable law.

C. Criminal Record Screening

Flex may require a Canadian criminal-record screening as part of Worker onboarding or eligibility for particular opportunities.

The scope and type of screening will be disclosed as part of the screening process.

Certn will obtain the consent and information required to conduct the applicable criminal-record check.

Acceptance of this Privacy Policy does not by itself authorize Flex or Certn to conduct a background check.

You will be provided with a separate screening disclosure and consent or authorization process before a criminal-record check is conducted.

Flex may receive information from Certn concerning:

- whether screening has been initiated;
- screening status;
- completion status;
- identity-verification status;
- screening results; and
- other information reasonably necessary for Flex to administer the screening process.

Depending on the screening configuration and applicable requirements, Certn may make additional information available to Flex.

Flex seeks to collect and retain only the screening information reasonably necessary for legitimate Platform, trust and safety purposes.

A screening result may affect eligibility to use certain features of Flex or access particular work opportunities. Any decision involving screening information will be made in accordance with applicable law and Flex's applicable screening policies.

D. Certn's Privacy Practices

Certn handles information collected directly through its services in accordance with its own privacy policy, biometric notice and screening disclosures.

Workers should review the privacy and consent information presented by Certn before submitting information through the screening process.

3. Payment and Transaction Information

Flex uses **Stripe** to provide payment-processing and related transaction services.

When you make or receive payments through Flex, Flex and Stripe may collect or process information including:

- payment or payout information;
- billing information;
- transaction amounts;
- transaction history;
- payment status;
- invoices;
- refunds or adjustments;
- information required to prevent payment fraud; and
- other information necessary to process or administer a transaction.

Where payment-card or bank information is collected directly by Stripe, Flex may not receive or store the complete payment credentials.

Stripe may process personal information for payment processing, payouts, authentication, fraud prevention, dispute management, regulatory compliance and other purposes described in Stripe's privacy materials.

Stripe also handles information in accordance with its own privacy practices.

4. Communications

If you communicate through Flex or communicate directly with us, we may collect the content and details of those communications, including:

- Platform messages;
- support requests;
- emails;
- feedback;
- complaints;
- safety reports;
- dispute information; and
- other correspondence.

We may use communications to provide services, facilitate opportunities, respond to users, investigate concerns, resolve disputes, improve Flex and protect the Platform and its users.

5. Device, Technical and Usage Information

When you access Flex, we may collect technical information necessary to operate, secure and maintain the Platform, such as:

- device type;
- operating system;
- application version;
- IP address;
- application or device identifiers;
- login and access information;
- dates and times of access;
- crash information;
- diagnostic information; and
- information about Platform functionality and performance.

Flex has not yet implemented a separate third-party behavioural analytics platform for the initial version of the Platform.

If we introduce analytics technologies that materially change the personal information we collect or how we use it, we will update our privacy disclosures and provide additional choices or obtain consent where required.

6. How We Use Personal Information

Flex may use personal information for the following purposes.

A. Creating and Managing Accounts

We may use information to:

- create and maintain accounts;

- verify email addresses and telephone numbers;
- authenticate users;
- verify identity where required;
- maintain Worker and business profiles;
- provide Platform functionality;
- respond to requests; and
- provide customer and technical support.

B. Operating the Marketplace

We may use information to:

- enable businesses to post work opportunities;
- enable Workers to browse opportunities;
- facilitate applications, bids or claims;
- facilitate acceptance and confirmation of shifts;
- recommend Workers or opportunities;
- communicate shift information;
- coordinate opportunities;
- maintain shift histories; and
- facilitate interactions between Workers and businesses.

C. Matching Workers and Opportunities

Flex may use information including:

- location or preferred work area;
- availability;
- qualifications;
- certifications;
- skills;
- experience;

- work preferences;
- ratings;
- shift history; and
- performance information

to identify, rank, recommend or facilitate potentially relevant Workers and work opportunities.

As Flex develops, automated technology may assist with matching and recommendations.

D. Trust, Safety and Marketplace Integrity

We may use information to:

- verify accounts and identity;
- administer background screening;
- administer ratings and reviews;
- review credentials;
- investigate complaints;
- address safety concerns;
- detect fraud or misuse;
- enforce Platform rules;
- prevent unauthorized activity; and
- protect Flex, Workers, businesses and others.

E. Payments and Transactions

We may use information to:

- charge businesses;
- facilitate Worker payments or payouts;
- calculate Platform fees;
- issue invoices;
- maintain transaction records;

- process refunds or adjustments;
- manage payment disputes;
- prevent payment fraud; and
- satisfy applicable accounting, legal and regulatory requirements.

F. Communications and Notifications

We may use your information to send:

- work-opportunity notifications;
- shift reminders;
- application or match updates;
- account communications;
- transaction information;
- security notices;
- service announcements; and
- customer-support communications.

G. Improving Flex

We may use information to:

- maintain and improve Platform functionality;
- understand how Platform features are used;
- improve matching;
- identify technical problems;
- evaluate marketplace performance;
- test new features; and
- develop new products and services.

Where appropriate, Flex may use aggregated or de-identified information that does not reasonably identify an individual.

H. Legal and Business Purposes

We may use information where reasonably necessary to:

- comply with applicable law;
 - respond to lawful requests;
 - maintain required records;
 - investigate or resolve disputes;
 - detect or investigate unlawful activity;
 - establish, exercise or defend legal rights; and
 - protect the rights, safety and property of Flex, our users and others.
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7. Information Shared Between Workers and Businesses

Sharing certain information between Workers and businesses is necessary for the Flex marketplace to operate.

A. Worker Information Shared With Businesses

When a Worker applies for, claims, is matched with or accepts an opportunity, Flex may make information relevant to that opportunity available to the applicable business.

Depending on the opportunity and stage of the process, this may include:

- name;
- profile photograph;
- work experience;
- skills;
- qualifications;
- certifications;
- availability;
- ratings or reputation information;
- relevant Platform or shift history; and
- other information reasonably necessary to evaluate or administer the opportunity.

Flex seeks to limit information shared with businesses to information reasonably relevant to the marketplace interaction.

Additional contact or administrative information may become available after an opportunity is confirmed where reasonably necessary to coordinate a shift.

B. Information Businesses Provide About Workers

Businesses may provide Flex with information regarding a Worker's:

- application;
- attendance;
- shift completion;
- reliability;
- performance;
- conduct;
- skills;
- safety; and
- ratings or other feedback.

This information may become part of the Worker's Flex history and may affect future matching, recommendations, reputation or eligibility for opportunities.

C. Information Workers Provide About Businesses

Workers may provide ratings, reviews, safety feedback or other information concerning businesses and worksites.

Flex may use and, where appropriate, display this information to promote transparency, safety and informed marketplace decisions.

8. When We Share Personal Information With Others

Flex does **not sell personal information**.

We may disclose personal information in the following circumstances.

A. Service Providers

Flex uses third-party providers to help operate the Platform.

These may include providers supporting:

- cloud hosting and technology infrastructure;
- payment processing, including Stripe;
- identity verification and background screening, including Certn;
- email, SMS and push notifications;
- cybersecurity and fraud prevention;
- customer support;
- accounting; and
- professional legal and compliance services.

We seek to provide service providers only with information reasonably necessary to perform the applicable service.

B. Legal and Safety Reasons

Flex may disclose personal information where permitted or required by law, including where reasonably necessary to:

- comply with lawful legal process;
- respond to a court, regulatory or governmental request;
- investigate fraud or unlawful activity;
- address an immediate safety concern;
- enforce our agreements or policies; or
- protect the rights, safety or property of Flex, our users or others.

C. Business Transactions

If Flex participates in a financing, merger, acquisition, restructuring, sale of assets or similar corporate transaction, personal information may be disclosed where permitted by law and subject to appropriate confidentiality and privacy safeguards.

9. Processing and Storage Outside Canada

Flex is a Canadian company. However, some service providers used to operate the Platform may process, transfer or store personal information outside Canada.

This includes certain services provided by Stripe and may include other technology or service providers used by Flex.

As a result, personal information may be subject to the laws of the jurisdiction in which it is processed or stored and may be accessible to courts, law-enforcement agencies or governmental authorities where permitted or required by those laws.

Flex remains responsible for personal information under its control and takes reasonable measures appropriate to the nature and sensitivity of the information when engaging service providers.

Certain Certn biometric information associated with a Canadian Flex account may be processed or stored in Canada in accordance with Certn's applicable practices, but other information or service-provider processing may occur in other jurisdictions.

You may contact Flex's Privacy Officer if you have questions about service providers or processing outside Canada.

10. Consent and Your Choices

Flex identifies the purposes for collecting personal information before or at the time it is collected where required.

Certain collection, use and disclosure is necessary for Flex to provide its services.

For example, Flex cannot meaningfully operate a Worker account without basic account information or facilitate an application without sharing information relevant to the opportunity with the applicable business.

Where a proposed collection or use is optional, particularly sensitive or materially different from the purpose for which information was originally collected, Flex will provide an appropriate choice or obtain additional consent where required.

Separate consent may be requested for activities including:

- criminal-record screening;
- biometric identity verification;
- future precise device-location functionality;

- optional marketing communications; and
- other materially different uses of personal information.

You may withdraw consent where permitted by law, subject to reasonable notice and any legal or contractual restrictions.

Withdrawing consent may prevent Flex from providing a feature or service that depends on the applicable information.

11. Marketing Communications

Flex may send marketing or promotional communications where permitted by applicable law.

Where consent is required, promotional communications will use an appropriate opt-in process.

Consent to optional marketing is not required to create or maintain a Flex account.

Users may unsubscribe from promotional communications using the unsubscribe mechanism provided in the communication.

Unsubscribing from marketing does not prevent Flex from sending non-promotional messages reasonably necessary to:

- administer your account;
- communicate about a work opportunity or shift;
- process a transaction;
- provide security information; or
- respond to a request.

12. Accuracy, Access and Correction

Flex makes reasonable efforts to ensure that personal information is accurate and complete when the information is likely to be used to make a decision affecting an individual or disclosed to another organization.

You may update certain information directly through your Flex account.

You may also contact Flex to request access to personal information under our control or correction of inaccurate or incomplete information, subject to applicable legal exceptions.

A request for access may include information about how your personal information has been used and the persons or organizations to whom Flex has disclosed it, subject to applicable law.

Ratings and feedback may contain opinions or information provided by another Platform user. If you dispute a rating, review or performance record, Flex may review the underlying circumstances rather than automatically deleting or changing the information.

Flex may take reasonable steps to verify your identity before responding to an access or correction request.

13. Retention of Personal Information

Flex retains personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected and for legitimate legal or business requirements.

Relevant considerations may include:

- whether your account remains active;
- shift and marketplace history;
- screening and verification records;
- ratings and reviews;
- complaints or disputes;
- safety and fraud-prevention requirements;
- completed transactions;
- accounting and tax requirements; and
- applicable limitation or legal-retention periods.

Where Flex uses personal information to make a decision that directly affects an individual, Flex will retain the information used to make that decision for at least the minimum period required by applicable law.

After personal information is no longer reasonably required, Flex will take reasonable steps to securely destroy it or remove the means by which it can reasonably be associated with an identifiable individual, subject to applicable legal and business requirements.

14. Account Deletion

Flex provides an **in-app account deletion option**.

You may request deletion of your account through the applicable account settings.

Deleting an account does not necessarily result in immediate deletion of every record associated with it.

Flex may retain information where reasonably necessary or legally required for purposes such as:

- completed transactions;
- tax or accounting requirements;
- screening or eligibility decisions;
- fraud prevention;
- safety;
- complaints or disputes;
- enforcement of agreements; or
- legal claims.

Where information must be retained, Flex will seek to restrict its continued use to the applicable retention purpose.

Aggregated or de-identified information that can no longer reasonably identify you may also be retained.

15. Security

Flex uses reasonable administrative, organizational and technical safeguards appropriate to the nature and sensitivity of personal information under its control.

These measures are designed to protect personal information against risks including unauthorized:

- access;
- collection;
- use;
- disclosure;
- copying;
- modification;
- loss; or
- disposal.

No internet-connected service can guarantee absolute security.

Users are responsible for protecting their account credentials and should promptly notify Flex if they believe their account has been accessed without authorization.

Flex will investigate suspected privacy or security incidents and will provide notifications to affected individuals or regulators where required by applicable law.

16. Age Requirement

The Flex Platform is intended for individuals **18 years of age or older**.

Individuals under 18 may not create Worker accounts or accept work opportunities through Flex.

If Flex learns that an individual under 18 has created a Worker account, we may close the account and take appropriate steps concerning the associated personal information.

17. Advertising and Tracking

Flex does **not currently use personal information for third-party targeted advertising through the Platform**.

Flex may introduce advertising functionality in the future.

Before introducing advertising technologies or cross-service tracking that materially change how personal information is collected, used or disclosed, Flex will update its privacy disclosures and provide choices or obtain consent where required.

18. Changes to Our Services and Privacy Practices

Flex expects its Platform to evolve.

New functionality may include additional location features, analytics, verification services, integrations, payment functionality or other marketplace tools.

Before introducing functionality that results in a materially different collection, use or disclosure of personal information, Flex will assess the privacy implications, update its disclosures where appropriate and obtain additional consent where required.

19. Changes to This Privacy Policy

Flex may update this Privacy Policy as our Platform, technology, business practices or legal requirements change.

The “Last Updated” date at the top of this Policy will identify the current version.

Where a change materially affects how we collect, use or disclose personal information, Flex will provide appropriate notice and obtain additional consent where required.

20. Privacy Accountability

Flex SC Technologies Inc. is responsible for personal information under its control and designates a Privacy Officer responsible for overseeing Flex's privacy practices.

Questions, privacy requests or complaints may be directed to:

Privacy Officer

Flex SC Technologies Inc.

Email: info@flextechsc.com

Website: flextechsc.com

Please use “**Privacy Request**” in the subject line where practical.

Flex will review privacy requests and complaints and respond in accordance with applicable privacy law.

21. Applicable Privacy Laws

Flex handles personal information in accordance with applicable Canadian privacy legislation.

Depending on the circumstances, this may include British Columbia's **Personal Information Protection Act (PIPA)**, Canada's **Personal Information Protection and Electronic Documents Act (PIPEDA)** for applicable interprovincial, international or other federally regulated activities, and other applicable provincial privacy legislation as Flex expands.

22. Contact Us

For questions about this Privacy Policy or Flex's handling of personal information:

Flex SC Technologies Inc.

Attention: Privacy Officer

Email: info@flextechsc.com

Website: flextechsc.com