

CREO THINGS INC.

Privacy Policy

Effective date: June 22 , 2026

This Privacy Policy explains how Creo Things Inc. collects, uses, discloses and protects your personal information when you use our platform. We are committed to handling your personal information responsibly and in accordance with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA). Please read this Policy together with our Terms of Service.

1. About This Policy

- 1.1 **Who we are.** Creo Things Inc. ("Creo Things", "we", "us" or "our") is a corporation incorporated under the Canada Business Corporations Act (corporation no. 1770724-0), with a registered office at 181 University Avenue, 3rd Floor, Toronto, Ontario M5H 3M7. We operate the Creo Things website and applications and related services (the "Platform"), a peer-to-peer marketplace for custom printing (Print), digital design files (Design) and physical products (Shop).
- 1.2 **What this Policy covers.** This Policy applies to personal information we handle in connection with the Platform. It forms part of our Terms of Service. Capitalized terms not defined here have the meaning given in the Terms of Service.
- 1.3 **Where we operate.** The Platform is offered for use in Canada and is not directed to, or available to, users in Quebec at launch, and we restrict availability accordingly. If we later make the Platform available in Quebec, we will update this Policy to address the additional requirements that apply there, including a French-language version and the requirements of Quebec's Law 25.
- 1.4 **Our accountability.** We are responsible for the personal information under our control, including information we transfer to service providers for processing. We have designated a Privacy Officer who is responsible for our compliance with this Policy. Our Privacy Officer is currently Tina Peng, who can be reached using the contact details in Section 14.

2. Definitions

"Personal information" means information about an identifiable individual, as defined in PIPEDA. It does not include the business contact information of an individual that we collect, use or disclose solely to communicate with them in connection with their employment, business or profession.

"Process" means any operation we perform on personal information, including collecting, recording, storing, using, disclosing, transferring, retaining, anonymizing and deleting it.

"You" means any individual who uses the Platform, in any role (Customer, Maker, Creator or Seller).

3. Information We Collect

- 3.1 **Information you give us.** When you create an account, we collect your first name, last name, email address and date of birth (we use date of birth to confirm that you meet our minimum age requirement). If you act as a Maker or Seller, we also collect the additional information needed to onboard and pay you, including your phone number and address, together with the account information described in Section 3.3. If you register with an email address and password, your login credentials are handled through our authentication provider (see Section 3.6). You may also add optional profile details.
- 3.2 **Content you upload.** We collect the listings, design files, images, descriptions, messages, reviews and other content you submit to or through the Platform. Files offered under a Platform-Only Access License remain stored within the Platform and are made available only as degraded previews through authenticated, short-lived links until purchased or licensed.
- 3.3 **Payment information.** Payments are processed by our third-party payment processor, Stripe, through Stripe Connect Express. We do not collect or store full payment-card numbers. For Customer transactions, we receive information such as the Customer's name and email address, the transaction amount, our platform fee amount, payment and refund status, and Stripe transaction identifiers. For Makers and Sellers, we receive account-related information from Stripe such as the Stripe account ID, business type, business name (if provided), country and verification status. Makers and Sellers provide their banking and payout information directly to Stripe, and Stripe carries out identity and KYC verification. We do not receive or store government-issued identification, social insurance or social security numbers, or full banking information through Stripe.
- 3.4 **Location information.** The Platform uses location information to connect Customers with nearby Makers and to support pickup, drop-off and fulfilment. We collect location only in the form of Canadian postal addresses that you enter manually; we do not collect GPS or device-based location and we do not derive your location from your IP address. An address is required when you sign up and at checkout because we need it to provide and fulfil orders, and there is no opt-out. Public listing pages show delivery methods and any optional pickup notes you choose to add, not street addresses. After payment, a Customer is shown the Maker's pickup address on the order confirmation to enable pickup or fulfilment; Makers are shown the Customer's name, and a Customer's address is shared with a Maker only where it is needed to ship a physical product to the Customer.
- 3.5 **Information we collect automatically.** When you use the Platform, we automatically collect certain technical information, such as your device and browser type, IP address, and log and usage data, through essential cookies and similar technologies needed to operate the Platform and keep you signed in (see Section 11). At launch we do not use Google Analytics or other third-party analytics platforms. We may add error-monitoring or analytics tools in future

releases, and if we do we will update this Policy and provide any controls required by law.

- 3.6 **Information from third parties.** We may receive information about you from service providers that help us operate the Platform. If you choose to sign in using Google Sign-In (OAuth), we receive basic account information from Google to create or access your account; you may also create an account directly with an email address and password through our authentication provider, Supabase. We do not use a separate third-party identity-verification provider for Customers. For Makers and Sellers, identity verification and related compliance checks are carried out by Stripe through Stripe Connect Express as part of seller onboarding; we do not collect or store the government-issued identification, social insurance or social security numbers, or banking credentials used by Stripe for that verification.
- 3.7 **Data inventory.** The categories of personal information we collect, the purposes for which we use them, and the periods for which we retain them are described in this Section 3 and in Sections 4 and 8. We maintain an internal record of our data practices and update this Policy as those practices change.

4. Why We Collect and Use Your Information

We identify the purposes for which we collect personal information at or before the time we collect it. We use personal information to:

- create and manage your account and provide and operate the Platform;
- facilitate transactions between Users, including processing orders, payments, payouts, refunds and disputes through our payment processor;
- provide location-based features in the Print marketplace and support pickup, drop-off and in-person fulfilment;
- operate Trust and Safety functions, including moderation, automated and manual review of listings and uploads, and enforcement of our Terms;
- detect, prevent and address fraud, prohibited items, security incidents and other harmful or unlawful activity;
- communicate with you about your account, transactions, support requests and changes to our terms or services;
- understand and improve the Platform; and
- comply with our legal obligations and enforce our agreements.

- 4.1 **New purposes.** If we intend to use or disclose personal information for a purpose not identified in this Policy, we will identify that purpose and, where required, obtain your consent before doing so.

5. Consent

- 5.1 **How we obtain consent.** We collect, use and disclose your personal information with your consent, except where the law permits or requires us to do so without

it. Depending on the sensitivity of the information and the circumstances, consent may be express (for example, when you provide information or agree to this Policy during signup) or implied (for example, where you provide information for an obvious purpose). By creating an account and using the Platform you consent to the handling of your personal information as described in this Policy.

- 5.2 **Withdrawing consent.** Subject to legal and contractual restrictions and reasonable notice, you may withdraw your consent to our continued collection, use or disclosure of your personal information at any time by contacting us using the details in Section 14. If you withdraw consent, we may be unable to continue providing some or all of the Platform to you, and some information may need to be retained as described in Section 8.
- 5.3 **Minimum age.** The Platform is intended only for individuals who are at least 18 years old. We do not knowingly collect personal information from anyone under 18. See Section 12.

6. How We Disclose Your Information

We do not sell your personal information. We disclose personal information only as described below:

- 6.1 **To other Users to complete transactions.** To make the marketplace work, we share the information reasonably necessary to complete a transaction between the Users involved. For example, a Maker may receive the information needed to fulfil an order, and Users arranging in-person pickup or drop-off may receive the limited contact or location details needed to do so.
- 6.2 **To our service providers.** We share personal information with third parties that perform services on our behalf, including Stripe (payment processing), Vercel (infrastructure hosting) and Supabase (data storage). These providers are authorized to use personal information only as necessary to provide services to us, and we use contractual and other measures intended to provide a comparable level of protection while the information is being processed by them.
- 6.3 **For legal and safety reasons.** We may disclose personal information where we believe in good faith that it is required or permitted by law, in response to a valid legal request, to enforce our Terms, to detect, prevent or address fraud, security or technical issues, or to protect the rights, property or safety of Creo Things, our Users or others. As noted in our Terms, we may report conduct to law enforcement or other authorities where we consider it appropriate.
- 6.4 **In a business transfer.** If we are involved in a reorganization, merger, financing, sale of assets or similar transaction, personal information may be disclosed or transferred as part of that transaction, subject to appropriate confidentiality protections.

7. Storage and Cross-Border Transfer

- 7.1 **Where information is stored.** Your personal information may be stored and processed by us and by our service providers. Our primary database,

authentication and file storage are provided by Supabase on infrastructure located in Canada (the Canada Central region). Our application hosting and content delivery are provided by Vercel, which may process and serve data through infrastructure in multiple countries, including the United States. Payment processing, seller onboarding, identity verification and payouts are handled by Stripe, which may process and store data in multiple jurisdictions, including the United States. As a result, your personal information may be processed or stored in Canada, the United States and other jurisdictions used by these providers.

- 7.2 **What cross-border processing means.** Where personal information is processed or stored outside Canada, it is subject to the laws of the country in which it is held and may be accessible to the courts, law enforcement and national-security authorities of that country. We use contractual and other measures intended to protect personal information that is transferred to a service provider for processing, regardless of where it is located.

8. Retention

- 8.1 **How long we keep information.** We keep personal information only as long as reasonably necessary to fulfil the purposes for which it was collected, to provide the Platform, and to meet our legal, tax, accounting and dispute-resolution obligations. When personal information is no longer required, we will delete it or render it anonymous. Our current target retention periods, which may be refined as the Platform evolves, are as follows:

User accounts: until you ask us to delete your account, after which we remove the information within approximately 30 days, subject to our legal obligations.

Orders and transaction records: 7 years.

Payment-related records: 7 years.

Messages between users: 2 years after account closure.

Listing files and images: for as long as the listing remains active.

Quote files, design files and uploaded manufacturing files: 2 years after order completion.

Support requests and support emails: 3 years.

Application and security logs: 30 to 90 days.

We may retain certain information for longer where required by law or for fraud prevention, dispute resolution, or tax and accounting purposes.

9. Safeguards and Security

- 9.1 **How we protect information.** We maintain administrative, technical and physical safeguards appropriate to the sensitivity of the personal information we hold, including measures such as access controls and encryption of information in transit. No method of transmission or storage is completely secure, and we cannot guarantee absolute security; however, we work to protect personal information against loss, theft and unauthorized access, disclosure, copying, use or modification.
- 9.2 **Security incidents.** If a breach of security safeguards involving your personal information creates a real risk of significant harm to you, we will notify you and

report to the Office of the Privacy Commissioner of Canada as required by law, and we will keep records of breaches as required.

10. Your Right to Access and Correct Your Information

- 10.1 **Access and correction.** Subject to limited exceptions permitted or required by law, you have the right to ask whether we hold personal information about you, to access that information, and to ask us to correct it if it is inaccurate or incomplete. Many details can be viewed and updated directly in your account.
- 10.2 **How to make a request.** To make an access or correction request, contact us using the details in Section 14. We may need to verify your identity before responding. We will respond within the time required by law. If we refuse a request in whole or in part, we will explain why, subject to any legal restrictions.

11. Cookies and Similar Technologies

- 11.1 **Use of cookies.** We use cookies and similar technologies that are necessary to operate the Platform, keep you signed in, remember your preferences and maintain security. At launch we use only these essential cookies; we do not use third-party analytics or advertising cookies. If we introduce analytics, error-monitoring or other non-essential cookies in the future, we will update this Policy and provide any consent controls required by law.

12. Children

- 12.1 **Age requirement.** The Platform is not directed to, and may not be used by, anyone under 18. We do not knowingly collect personal information from individuals under 18. If we learn that we have collected personal information from someone under 18, we will delete it. If you believe a minor has provided us with personal information, please contact us using the details in Section 14.

13. Changes to This Policy

- 13.1 **Updates.** We may update this Policy from time to time. For minor or procedural changes, we will post the updated Policy on the Platform. For changes that materially affect how we handle your personal information, we will take reasonable steps to notify you in advance, for example by email or through the Platform. The “Effective date” at the top shows when this Policy was last updated. Your continued use of the Platform after a change takes effect constitutes acceptance of the updated Policy, except where the law requires your consent, in which case we will obtain it.

14. How to Contact Us

- 14.1 **Contact and complaints.** If you have questions, requests or concerns about this Policy or our handling of your personal information, please contact our Privacy Officer, Tina Peng, at legal@creothings.com. We will work with you to resolve any concern.

14.2 **Office of the Privacy Commissioner of Canada.** If you are not satisfied with our response, you have the right to make a complaint to the Office of the Privacy Commissioner of Canada (www.priv.gc.ca; 1-800-282-1376).