

Privacy Policy – GoRide (9557-8555 Québec inc.)

Effective Date: December 5, 2025

Last Updated: March 28, 2026

Applicable Website: www.goride.ca

1. About GoRide

GoRide Inc. (9557 8555 Québec inc.) operates a platform that connects stakeholders in the cycling market in Québec (riders, retailers, manufacturers) and simplifies the booking of equipment and maintenance services through a showcase website and dedicated web portals for riders and merchants.

2. Scope and Compliance Framework

This policy applies to personal information collected through technological means (website, portals, emails, cookies, analytics). It complies with the *Act Respecting the Protection of Personal Information in the Private Sector*, as modernized by *Law 25* (Québec), and aligns with applicable Canadian requirements (PIPEDA), particularly those concerning privacy incidents. It also fulfills the obligation to publish a clear privacy policy whenever personal information is collected through technological means.

3. Privacy Officer (RPRP)

Name: Xavier Hegetschweiler – **Title:** Co-Founder

Email: privacy@goride.ca

Mailing Address: 69 ch. Davis, Lac-Brome, QC, J0E 1S0

We publish the title and contact details of the Privacy Officer, who oversees compliance, rights requests, and incident management in accordance with Law 25.

4. Information We Collect

We only collect the information necessary for the purposes described below:

- **Booking Form (showcase website):** first name, last name, address, email, phone number, booking date/time, pick-up/delivery addresses, preferences, required consents.
- **Rider Portal:** name, date of birth, contact information, login credentials (email + password), booking history.
- **Merchant Portal:** legal name, Québec enterprise number (NEQ), address, representatives, contact information, product catalog, pricing, booking history, deposits, and billing.
- **Automatic collection (website):** IP address, approximate geolocation, browser/device information, pages viewed, clicked links (via cookies and analytics tools).

Minors: In Québec, the consent of a parent or legal guardian is required for individuals under the age of fourteen (14). From fourteen (14) to seventeen (17), a minor may consent on their own to the collection of personal information.

However, where contractual or financial obligations are involved, the consent or involvement of a parent or legal guardian may be required in accordance with the applicable terms and conditions.

5. Purposes (Why We Use Your Information)

- Provide and manage booking and service delivery.
 - Create and administer rider/merchant accounts and provide support.
 - Manage commercial relationships (CRM), contracts, invoicing, and payments.
 - Send operational notices; marketing only with consent.
 - Analyze and improve our services (GA4 statistics).
 - Comply with legal and security obligations.
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6. Cookies, Analytics, Identification/Profiling and Default Settings

We use:

- **Essential cookies:** security, session — always active.
- **Analytics** (Google Analytics 4) – disabled by default and activated only with your explicit consent through a banner/preferences center.
- **Marketing/retargeting** – activated only with consent.

If we use technologies involving identification, location, or profiling functions, we will inform you beforehand and offer mechanisms to enable/disable these features. By default, privacy settings must offer the highest level of confidentiality.

7. Hosting, Service Providers, and Transfers Outside Québec

Our primary systems are hosted in Canada (AWS – ca-central region) with encryption at rest and in transit. We rely on service providers such as Amazon Web Services (hosting), Zoho (CRM), Microsoft OneDrive (contracts), Stripe (payments), and Google Analytics 4. These providers access only what is necessary, under contracts imposing security and confidentiality obligations. Certain service providers may access personal information from outside Québec, notably for technical support purposes, even where primary hosting is located in Canada.

Transfers outside Québec may occur (e.g., remote access by a SaaS provider, payment processing). Before any transfer, we perform a privacy impact assessment (PIA/TIA specific to the transfer) and ensure through written contractual clauses that protections are equivalent to Québec standards. We also inform individuals that their information may be communicated outside Québec.

8. Security Measures

We apply measures proportional to sensitivity: access control (least privilege), MFA for internal accounts, encryption at rest and in transit, logging, backups, and periodic testing.

9. Governance, Internal Policies, and PIAs

As required by Law 25, we implement and publish governance policies and practices (including this web policy) and conduct PIAs for projects involving personal information (e.g., procurement/development/redesign of systems, electronic service delivery).

10. Retention, Anonymization, and Destruction

We retain information for the period necessary for the purposes described and in accordance with our retention schedules and legal obligations.

At the end of these retention periods, personal information is securely deleted, destroyed, or anonymized in accordance with documented procedures.

Privacy incident records, where applicable, are retained for a minimum period of twenty-four (24) months, in compliance with legal requirements.

11. Privacy Incidents (Security Breaches)

In the event of an incident (unauthorized access, use or disclosure, loss, etc.), we:

- mitigate risks, prevent recurrence, and keep an incident log;
 - notify the CAI and affected individuals without delay where there is a risk of serious harm;
 - when PIPEDA applies, report to the OPC and notify individuals if the real risk of significant harm (RROSH) threshold is met;
 - maintain a detailed record of all incidents.
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12. Decisions Based Solely on Automated Processing

If a decision concerning you is made solely through automated processing (including profiling), we will inform you, disclose the personal information used, and offer the opportunity to submit observations or request human review.

13. Biometric Technologies

GoRide does not currently use any biometric technologies.

Should such technologies be implemented in the future, GoRide will comply with all applicable legal requirements, including prior disclosure to the Commission d'accès à l'information of Québec.

14. Your Rights

Subject to legal conditions, you have the following rights:

- Access and obtain a copy of your information;
- Correct incomplete or inaccurate information;
- Withdraw consent (e.g., marketing/cookies), without retroactive effect;
- De-indexing in applicable situations;
- Portability for computerized personal information collected from you, provided in a structured and commonly used technological format, including direct transmission to another organization upon request unless this would cause serious practical difficulties.

Timelines: We respond within 30 days to access, correction, or portability requests, following the applicable procedure.

15. How to Exercise Your Rights or File a Complaint

Write to the Privacy Officer: privacy@goride.ca

(Subject: "Privacy Request") and specify your identity and the nature of the request.

If you are not satisfied, you may contact:

- **Commission d'accès à l'information (CAI) – Québec**
 - **Office of the Privacy Commissioner of Canada (OPC)** if PIPEDA applies (e.g., interprovincial activities)
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16. With Whom We Share Your Information

Internal: customer service, billing/finance, operations/logistics, technical team (security/maintenance).

Service Providers: AWS (hosting – Canada), Zoho (CRM), Microsoft OneDrive (contract storage), Stripe (payments), GA4 (analytics). These third parties access only what is necessary and are bound by written contracts requiring security measures and confidentiality commitments. For cross-border transfers, a transfer PIA and contractual clauses are required.

17. Government Requests and Business Transactions

We may disclose information if required by law (subpoenas, investigations) and in the context of business transactions permitted under Law 25 (subject to statutory safeguards).

18. Updates to This Policy

We may update this policy to reflect our practices or legal changes. The update date appears at the top. Significant changes will be announced via notice on the website.