

The purpose of this Privacy Policy is to inform you about the types of Personal Information the Vanbex Group INC., or its agents, (as follows, "Vanbex", "CryptoTaxes" "we" or "us") collects about you in the process of conducting the principal activities of Vanbex and to provide you with general membership benefits as well as providing you with specific products and services you have contracted from us. It explains how we use and disclose that information, the choices you have regarding such use and disclosure, and how you may correct that information. The majority of the collection, use and disclosure of personal information by Vanbex is for the purposes of subscription, and therefore for commercial purposes.

This Privacy Policy sets out a summary of the principles and procedures that Vanbex follows in meeting its privacy commitments and, as applicable in light of the foregoing, complying with the requirements of the laws and regulations under applicable privacy laws in Canada, including the Personal Information Protection and Electronic Documents Act. From time to time, we may make changes to this Privacy Policy. The Privacy Policy is current as of the "last revised" date which appears at the bottom of this page. We will treat Personal Information in a manner consistent with the Privacy Policy under which it was collected unless we have your consent to treat it differently. This Privacy Policy applies to any information we collect or receive about you, from any source.

PRINCIPLE #1 — VANBEX IS ACCOUNTABLE FOR YOUR PERSONAL INFORMATION IN ITS POSSESSION OR CONTROL.

Vanbex is accountable for all personal information in its possession or control. This includes any personal information that Vanbex has collected about members, students, candidates, customers, and past members (each, a "Vanbex Stakeholder"), as either collected directly from such Vanbex Stakeholder; "Vanbex Website"(s) including but not limited to crypto-taxes.tax and its subdomains. However, from time to time Vanbex may

collect, use and disclose personal information, in which case, without limiting the obligations of Vanbex to comply with applicable privacy laws, such other principal entities shall be accountable for such personal information.

Vanbex has:

- established and put into effect policies and procedures aimed at properly protecting personal information;
- educated its staff regarding such policies and procedures and their roles and responsibilities in protecting personal information; and
- appointed a Chief Privacy Officer to oversee privacy issues at Vanbex

PRINCIPLE #2 — VANBEX IDENTIFIES THE PURPOSES FOR WHICH IT COLLECTS PERSONAL INFORMATION FROM YOU BEFORE IT IS COLLECTED.

We generally identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use.

Some of the primary purposes for which we collect and use your Personal Information include:

- to provide services to you in your capacity as a Vanbex Stakeholder;
- to complete a transaction with you when you purchase or use a product or service offered by us;
- to advise you of Vanbex products or services that may be of interest to you;
- to send you electronic Vanbex newsletters that may be of interest to you or to which you have subscribed, and to better understand which articles are of interest to you;
- to conduct research and analytics for purposes that include but are not limited to better understanding Vanbex Stakeholders, allowing Vanbex Stakeholders to provide feedback on products and services, and producing data analytics and statistical reports;

- to present non- Vanbex content and advertising that is customized to your interests;
- to respond to inquiries you submit;
- to establish and manage your Vanbex Website account(s);
- to customize the content presented to you when using a Vanbex Website;
- to utilize certain Vanbex Website services, and
- to report usage of a Vanbex Website

We may also use your Personal Information as otherwise permitted or required by law.

PRINCIPLE #3 — VANBEX OBTAINS YOUR CONSENT BEFORE COLLECTING PERSONAL INFORMATION FROM YOU.

We explain your options and obtain your implicit or explicit consent at the time of or prior to collecting, using or disclosing your Personal Information. We will always collect your Personal Information by fair and lawful means (for example, when you complete an application form or purchase a product or service from us). We may collect Personal Information about you from third parties, Vanbex Website(s), and other institutions and organizations. We also collect your Personal Information where we have obtained your consent to do so or as otherwise permitted or required by law.

Where is it reasonable to do so, or permitted by law, we may rely on implied consent.

Except as required to process a transaction, to maintain records of Vanbex or as required or permitted by applicable law, providing us with your personal information is voluntary. You may withdraw or modify your consent at any time, subject to legal and contractual restrictions, provided that reasonable notice is given to us. If you withdraw your consent to receive information regarding certain products, publications, services or events being offered by us, you may not be made aware of same. Refusal or withdrawal of consent from use of personal information by Vanbex Website(s) may result in our being unable to provide you with Vanbex Website services.

From time to time, Vanbex Website site and service updates are emailed to users. If you do not wish to receive such mailings, you may request to be removed from this electronic mailing list at any time by contacting our Chief Privacy Officer (see contact information under Principle #8). You should understand, however, that if you are removed from the mailing list you may not be made aware of the status or availability of certain Vanbex Website services.

Personal Information is any information that is identifiable to you. This information may include, but is not limited to, your name, mailing address, phone numbers, email address, identification numbers, credit card numbers, banking information, and creditor information. Personal Information, however, generally does not include information that Vanbex collects, uses or discloses solely for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession such as the individual's name, position name or title, work address, work telephone number, work fax number or work electronic address.

PRINCIPLE #4 — VANBEX DISCLOSES YOUR PERSONAL INFORMATION ONLY FOR PURPOSES FOR WHICH IT HAS CONSENT, OR AS PERMITTED OR REQUIRED BY LAW. VANBEX RETAINS PERSONAL INFORMATION ONLY AS LONG AS NECESSARY TO FULFIL THOSE PURPOSES.

We identify to whom, and for what purposes, we disclose your Personal Information, at the time of or prior to collecting such information from you and obtain your consent to such disclosure. For example, we may:

1. transfer/disclose your Personal Information, in the case of Vanbex Stakeholders;
2. transfer your Personal Information to third party service providers with whom we have a contracted agreement that includes appropriate privacy standards, such

as service providers that provide communication services support or data storage or processing;

3. on Vanbex Website(s), to your organization via usage reports accessible by the individual(s) designation by your organization as its group administrator(s);
4. disclose your Personal Information to such persons and for such purposes for which you provide your consent; and
5. disclose your Personal Information as otherwise permitted or required by law.

We may keep a record of your Personal Information, correspondence or comments in a file specific to you. We will utilize, disclose or retain your Personal Information for as long as necessary to fulfil the purposes for which it was collected and as permitted or required by law.

From time to time we may disclose or hold your Personal Information outside of Canada, and while outside of Canada it may be subject to access by regulators in accordance with the laws of those jurisdictions.

PRINCIPLE #5 — VANBEX ENDEAVOURS TO KEEP ACCURATE, COMPLETE, AND UP-TO-DATE, PERSONAL INFORMATION IN ITS POSSESSION OR CONTROL, TO THE EXTENT REQUIRED TO MEET THE PURPOSES FOR WHICH IT WAS COLLECTED.

We will ensure that your Personal Information is kept as accurate, complete and up-to-date as possible based on information provided to us. We expect you, from time to time, to supply us with written updates to your Personal Information, if applicable. In the case of Vanbex Stakeholders, Personal Information may be updated by accessing profiles created on a related Vanbex Website.

PRINCIPLE #6 — VANBEX PROTECTS THE PRIVACY OF PERSONAL INFORMATION IN ITS POSSESSION OR

CONTROL BY USING SECURITY SAFEGUARDS APPROPRIATE TO THE SENSITIVITY OF THE INFORMATION.

We have implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only employees who are granted access to your Personal Information are those with a business 'need-to-know' or whose duties reasonably require such information.

You can visit our Vanbex Website(s) without telling us who you are or revealing any information about yourself, including your email address. However, our web server may collect the IP address and domain you used to access our Vanbex Website(s), the type and version of web browser and operating system you are using, the number, duration and frequency of visits to our Vanbex Website(s) and the Vanbex Website you came from and visited next. This anonymous information cannot be traced to a specific individual User - it is used by us simply for the purposes of analytics – for example, to measure the number of visits, average time spent, page views, most popular preferences and other statistics about visitors to the Vanbex Website(s) and to determine the characteristics in which users use our Vanbex Website(s) and services. We may use this data to monitor Vanbex Website performance for systems administration purposes, to make Vanbex Website(s) easier and more convenient to use, to improve our services and to track information in aggregate form (e.g. how many visitors use Vanbex Website(s)). This helps us better understand our Vanbex Website(s) traffic, visitor behavior and the impact of campaigns, content and email-driven traffic. By having access to such deeper data insights, we are able to measure, re-evaluate content offerings, map customer buying journeys and provide you with a more personalized visitor site experience, enabling demographic and interest reporting.

We make use of Google Analytics. A description of how Google Analytics collects and processes data is set out in “How Google uses data when you use our partners' sites or apps”, (located at www.google.com/policies/privacy/partners/).

Please note that we have also implemented the following specific Google Analytics Advertising Features:

- Remarketing with Google Analytics
- Google Display Network Impression Reporting
- Google Analytics Demographics and Interest Reporting
- Integrated services that require Google Analytics to collect data via advertising cookies and identifiers.

We use cookies, that is, small files that your Web browser places on your computer's hard drive, to remember a User's code, subscriptions, and preferences while the User is using Vanbex Website(s), to facilitate navigating different pages on Vanbex Website(s), to personalize the users experience when returning to Vanbex Website(s), to monitor progression through Vanbex Website(s), to identify opportunities to improve the user experience, and to customize ads you see when visiting Vanbex Website(s), and third party sites. Also, as a result of us enabling the Advertising Reporting Features, in addition to collecting the information it normally does, Google Analytics collects information via its Google advertising cookies: see

<https://support.google.com/analytics/answer/2444872#web>.

Should you wish to opt out of the Google Analytics advertising features, you may do so at <https://tools.google.com/dlpage/gaoptout/>.

Our Vanbex Website(s) contains security mechanisms that protect against the loss, the misuse and the modification of information under our control.

Our Vanbex Website(s) may provide links to third party web sites. Our Privacy Policy does not extend to these third party web sites and it is recommended that Users read

the privacy policies of these web sites. We are not responsible for the content of, or the privacy practices employed by, third party web sites.

Please note that it is your responsibility to protect your user id and password information. If this information is disclosed the privacy of your information cannot be assured.

PRINCIPLE #7 — VANBEX IS OPEN ABOUT THE PROCEDURES IT USES TO MANAGE PERSONAL INFORMATION.

Up-to-date information on Vanbex's privacy policies can be obtained from Vanbex's Chief Privacy Officer (see contact information under Principle #8).

PRINCIPLE #8 — VANBEX RESPONDS ON A TIMELY BASIS TO REQUESTS FROM VANBEX STAKEHOLDERS ABOUT THEIR PERSONAL INFORMATION, WHICH VANBEX POSSESSES OR CONTROLS.

We will generally make available to you any Personal Information that we have collected about you, utilized or disclosed, upon your written request, to the extent permitted or required by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes. Personal Information of Vanbex Stakeholders may be reviewed and updated by accessing profiles created on a related Vanbex Website.

You can at any time, challenge the accuracy or completeness of the Personal Information we have which is related to you. Where we validate your identity, and you successfully demonstrate the inaccuracy or incompleteness of your Personal Information, we will amend the Personal Information as required. Where appropriate, we

will transmit the amended information to third parties having access to your Personal Information.

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint to the federal Privacy Commissioner in respect of this time limit.

We will not assess any costs to you for access to your Personal Information or to our Privacy Policies or Practices without first providing you with an estimate of the approximate costs, if any. We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such information shall be used only for this purpose.

All comments, questions, concerns or complaints regarding your Personal Information or our Privacy Policy and Practices, should be forwarded to our Chief Privacy Officer as follows.

By mail:

Attn: Chief Privacy Officer

Vanbex Group

300 - 860 Homer St

Vancouver, BC

V6B 2W5

By e-mail: doug@vanbex.com

We will inform you of the relevant procedures when you make an inquiry or lodge a challenge or complaint.

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