



**PERSONAL INFORMATION AND
PRIVACY POLICY**

February 6, 2019

PELTON COMPUTER ENTERPRISES LTD.

Personal Information and Privacy Policy

This personal information and privacy policy (the "**Privacy Policy**") was last amended on February 6, 2019.

Peloton Computer Enterprises Ltd. and its subsidiaries ("**Peloton**") considers matters relating to the protection of personal information and privacy to be extremely important. In developing this Privacy Policy, Peloton wants to assure you that Peloton has taken into account your personal information and privacy and those of others.

Peloton encourages you to review this Privacy Policy. Peloton has created and implemented this Privacy Policy so that you understand how your personal information may be utilized and disclosed and how it is protected.

Peloton makes available a number resources over the Internet including the website and webpages located at www.peloton.com as well as Peloton's SaaS (Software as a Service) managed services for Peloton's applications (including, WellView, SiteView, RigView, ProdView and LandView) (all such Internet resources are called "**Peloton Online Services**" herein)

By providing personal information in your dealings with Peloton and using any Peloton Online Service with knowledge of this Privacy Policy, we will assume that you have consented to the collection, use and disclosure of personal information in accordance with the terms set out in this Privacy Policy.

If you have questions regarding this Privacy Policy or our privacy practises then please contact our Privacy Officer. His or her contact information is set out at the bottom of this Privacy Policy.

Our Commitment

Except as otherwise provided in this Privacy Policy, Peloton will not sell, rent, loan, trade, lease, transfer or otherwise disclose personal information, including e-mail addresses, to any third party.

Amendments to this Privacy Policy

Peloton may amend this Privacy Policy at any time by posting a new privacy policy in place of this one. These amendments may include, without limitation, adding to, deleting from or modifying any of the provisions in this Privacy Policy. Peloton will post notice that the Privacy Policy has been amended on the front page of its main website at www.peloton.com for a period of 30 days. The amended privacy policy shall automatically be effective when posted. Your continued dealings with Peloton or use of any Peloton Online Service following the posting of the amended privacy policy and the posting of such notice shall mean that you accept the terms of this Privacy Policy as amended. If you do not agree with any of the terms or conditions in the amended Privacy Policy then you agree to immediately cease all use of the Peloton Online Services and delete your accounts and cease in your dealings with Peloton, which shall be your sole recourse and remedy in the event you are dissatisfied with the amended Privacy Policy. This Privacy Policy may not otherwise be amended.

The first paragraph of this Privacy Policy indicates when the Privacy Policy was last amended. Please check back regularly to review for changes.

Definitions

In this Privacy Policy, the following term has the following meaning:

- **"personal information"** means information about an individual. Personal information does not include information that cannot be attributed to an individual. For example, information of an aggregate or anonymous nature.

Personal Information Made Anonymous

To the extent that we make any personal information anonymous or we aggregate it with the personal information of others, then that information will no longer be considered to be personal information. Therefore, Peloton will be entitled to use and disclose personal information in any manner that it desires provided the personal information has been rendered anonymous or aggregated where that information cannot be attributed to any individual.

Choosing to Provide Personal Information

In using any Peloton Online Service and in dealing with us you will have the ability to control the amount of personal information you are providing and therefore you may restrict the disclosure of personal information by not providing personal information to any Peloton Online Service or us in the first place. If you choose to limit the personal information you provide, it may limit the manner in which you can make use of the Peloton Online Services or otherwise interact with Peloton.

Consent

You shall obtain any required consents to the placement of any third party personal information into any Peloton Online Service and the processing and disclosure of the personal information as part of the Peloton Online Services and Peloton's handling of the personal information in connection with the offering, support, management and development of the Peloton Online Services as well as set out in this Privacy Policy, including as set out in the sections entitled "Use" and "Disclosure".

When we collect, use or disclose your personal information we will generally obtain your consent. Most of the time, we will obtain your consent before or at the same time we collect your personal information. In some instances, however, we may seek your consent after we have collected your personal information if we wish to make an additional use or disclosure of your personal information where we do not already have your consent for that new use or disclosure. This additional consent may be obtained through an amendment to this Privacy Policy as provided above.

Depending on the circumstances, your consent may be express or implied. Express consent would arise if you specifically consented to a particular dealing in your personal information. Express consent can be given orally, electronically or in writing. Implied consent can be inferred from the circumstances. For example, if we indicate that we may send certain correspondence to your home address and then you provide us with your home address in response, we would not normally obtain your explicit consent to use your home address to send you that correspondence; your consent would be implied in those circumstances.

We will assume your consent to the collection, use or disclosure of your personal information for a particular purpose if you voluntarily provide the information for that purpose.

Privacy Policy as a Means of Consent

In addition, certain collection, uses and disclosures that we wish to make of your personal information are specifically set out in this Privacy Policy. Be sure to review this Privacy Policy since by providing your personal information to us we will assume that you are consenting to the collection, use and disclosure of your personal information in accordance with the terms of this Privacy Policy.

Opting In and Opting Out

Peloton may, from time to time, provide you with an opportunity to opt out of certain collection, uses and disclosures of your personal information. At the same time, an implied consent to collect, use or disclose your personal information would arise if you fail to indicate that you wish to opt out of the particular collection, use or disclosure when you are given an opportunity to do so.

As well, Peloton may, from time to time, provide you with an opportunity to opt into certain collection, uses and disclosures of your personal information. In that case, if you do not opt-in, Peloton will assume that you do not consent to your personal information being collected, used or disclosed in that particular manner.

Peloton will generally use an opt-out method when the particular use or disclosure is not unusual, the information is not particularly sensitive or when Peloton believes that most people would likely consent to the particular use or disclosure. Peloton will generally use the opt-in method in other circumstances.

Changing Consent

You may change or withdraw your consent at any time on reasonable notice, subject to pre-existing legal and contractual obligations, by contacting our Privacy Officer as set out below. If you withdraw certain consents, it may limit the manner in which you can make use of the Peloton Online Services and to otherwise interact with Peloton. For clarity, your ability to change or withdraw consent is not absolute. Peloton reserves the right to continue handling your personal information in those circumstances required or permitted by law despite a change or withdrawal of consent.

Collection

Except as otherwise provided in this Privacy Policy, we will obtain your explicit or implied consent to collect your personal information. When obtaining your consent we will inform you of the uses and disclosures that we wish to make of your personal information unless those uses and disclosures are readily apparent at the time we collect the personal information or are set out in this Privacy Policy.

In some instances, we may collect your personal information directly from a third party. In that case, we will generally either obtain your consent to do so or we will require that the third party confirm to us that they are entitled to disclose your personal information to us.

Use

Except as otherwise provided in this Privacy Policy, when we use your personal information we will ensure that you had previously provided your consent to that use. If you had not previously provided that consent, we will then obtain your consent if that use is not set out in this Privacy Policy, or if that use was not readily apparent at the time we collected your personal information.

Set out below are certain circumstances where we may use your personal information without obtaining any further consent. By providing personal information to us, we are assuming that you are consenting to these uses unless you inform us otherwise. These are:

- using identification information and contact information, such as your name and e-mail address to provide information about Peloton and the Peloton Online Services when you request that information;
- using identification information and contact information, such as your name and e-mail address so that we can identify you and deliver services, including in connection with the Peloton Online Services, that you request and to communicate with you regarding those services;
- using payment method preferences and related financial information that you provide to us so that we can obtain payment for the services that you request;
- using information relating to your preferences so that we are able to deliver our services, including in connection with the Peloton Online Services, to you in accordance with those preferences;
- using relationship information such as your service requests, instructions, comments and feed back to assist us in delivering services, including in connection with the Peloton Online Services, in accordance with your wishes;
- using personal information for the purpose for which it was provided and certain other activities that are reasonably ancillary to that purpose. For example, if you send us an e-mail with a question or comment, Peloton will use your e-mail address to respond to you. Further, Peloton may store your e-mail and e-mail address and a copy of our response for future reference;
- using your e-mail address to provide you with information about new features or enhancements to our services and the Peloton Online Services;
- analyzing how personal information is being used to assist us in developing and enhancing our services and the Peloton Online Services; and
- analyzing how personal information is being used to assist us in conducting market analysis and strategic planning.

Except as otherwise provided in this Privacy Policy, Peloton will not use your personal information for any other purpose.

Disclosure

Except as otherwise provided in this Privacy Policy, when we disclose your personal information we will ensure that you had previously provided your consent to that disclosure or if you had not previously provided that consent, we will then obtain your consent if that disclosure is not set out in this Privacy Policy or if that disclosure was not readily apparent at the time we collected the personal information.

Set out below are certain circumstances where we may disclose your personal information without obtaining any further consent. By providing personal information to us, we are assuming that you are consenting to these disclosures unless you inform us otherwise. These are:

- Personal information that is supplied to the Peloton Online Services will be disclosed in accordance with the description of disclosures as set out in the related documentation for the Peloton Online Services or as may be readily apparent through the general operation of the Peloton Online Services;
- In the event Peloton transfers or is considering transferring control of any or all of its operations or services to another organization, Peloton reserves the right to transfer and disclose personal information to that organization. However, Peloton will require that the organization agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose personal information as Peloton is similarly entitled under this Privacy Policy;
- In the event Peloton amalgamates with another organisation, Peloton reserves the right to permit that amalgamated organisation to continue to use and disclose personal information. However, Peloton will require that the amalgamated organisation agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose personal information as Peloton is similarly entitled under this Privacy Policy;
- Peloton may engage certain service providers. Those providers may provide services to Peloton to assist Peloton in its activities. Other providers may provide services directly to you at the request of Peloton. As such, it may be necessary for Peloton to disclose personal information to these providers. However, Peloton will take steps to ensure that these providers will only use and disclose personal information as necessary to provide the services and that they will adhere to the terms of this Privacy Policy or their own similar privacy policy; and
- Peloton may work with other organisations towards some common purpose consistent with the objectives of Peloton. In that case, it may be necessary for Peloton to disclose your personal information to these organisations. However, Peloton will require that these organisations agree that they will only use and disclose your personal information as necessary for the common purpose and that they will adhere to the terms of this Privacy Policy.

Use of the Peloton Online Services

Our web servers collect the domain names, IP addresses and the activity of visitors. This information is aggregated for the purposes of measuring the number of visits, average time spent on the Peloton Online Services, pages viewed, and other similar purposes. Peloton uses this information to measure the use of the Peloton Online Services and to improve the content of the Peloton Online Services.

Requirement to have an Account

In order to use certain Peloton Online Services, including Peloton's SaaS (Software as a Service) managed services for Peloton's applications (including, WellView, SiteView, RigView, ProdView and LandView), you may need to provide certain personal information including name, current addresses, phone numbers and other contact information. Peloton may issue to you a unique "user id" which you will be required to provide each time you use certain features and services.

If you have a user id, then Peloton may collect information about your use of the features and services (whether or not you provide your user id each time) and Peloton may associate this information with your other personal information.

Cookies

A technology called cookies may be used on certain webpages making up the Peloton Online Services. A cookie is a tiny element of data that a website can send to your browser, which may then be stored on your device. Cookies allow us to track visitors to the webpages so we will know when they return. Cookies also allow us to provide the visitor with tailored information and services based on their previous visits. Cookies do not enable us to identify the visitor unless that visitor has previously provided personal information during a visit. If your browser permits, you may set your browser to notify you when you receive a cookie or to reject cookies altogether. (See the documentation provided with your Internet browser for more information on cookies and how to disable them.)

Other Collection, Use and Disclosure

Peloton may monitor your use of the Peloton Online Services to ensure the proper use and operation of the Peloton Online Services and your compliance with any terms of use related to the Peloton Online Services or other related agreements.

As well, the law permits or requires the collection, use and disclosure of personal information without the knowledge or consent of the individual in a number of circumstances. We reserve the right to collect, use and disclose your personal information in these circumstances without your knowledge or consent as the law may permit or require.

Accuracy and Completeness

When we collect, use or disclose personal information, we will make a reasonable effort to ensure that it is accurate, up to date and complete. To do so, we may need to request additional information from you or have you verify your information. If your personal information does change, we would appreciate it if you could inform us of those changes in order that your personal information in our possession remains accurate.

Retention and Destruction

For legal and business purposes we may retain your personal information for as long as it is reasonably needed. Upon expiry of the appropriate retention period, bearing in mind our reasonable legal and business requirements, your personal information will either be destroyed in a secure manner or made

anonymous. You should be aware that there are legally required minimum retention periods, which Peloton must and does observe.

Security of Personal Information

Peloton recognizes its obligation to protect personal information in its possession and will make reasonable arrangements to secure that personal information against unauthorized access. These measures will be reasonable in the circumstance and may include providing access to only those individuals with a need to know the information, locked doors and/or filing cabinets and other physical and electronic security measures as well as contractual measures, such as non-disclosure or confidentiality agreements.

Requests for Access to Personal Information

On your written request we will provide you with:

- access to your personal information (if any) under our custody or control;
- information about the purposes for which your personal information under our custody or control has been and is being used by us; and
- the names of persons to whom, and the circumstances in which, your personal information has been and is being disclosed by us.

All requests may be subject to reasonable fees and disbursements. Where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to personal information.

We require that all requests for access be in writing and be signed by the requestor. We require sufficient information and detail from the requestor in order to verify their identity, properly locate the information and respond to the request.

Limits on Individual Rights to Information

An individual's ability to access his or her personal information under our control is not absolute. Peloton reserves all rights to not disclose personal information in certain circumstances. For example, we may not disclose personal information where:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual;
- the disclosure would reveal personal information about another individual;
- the disclosure of the information would reveal confidential commercial information; or
- the personal information was collected by us for an investigation or legal proceeding.

Requests for Correction of Personal Information

On request by you, we will correct errors or omissions in your personal information where that information is in our custody or control. We require that all such requests be in writing and signed by you. We may require sufficient information and detail from the individual in question in order to verify their identity, properly locate the information and respond.

If you make such a request, we will either:

- correct the personal information and, if reasonable to do so, send correction notifications to any third party to whom we disclosed the incorrect information; or
- decide not to correct the personal information but we will annotate the personal information that a correction was requested but not made.

Corrections or amendments will rarely, if ever, be made to opinions, including expert or professional opinions, as opposed to factual information, which may be corrected if in error.

Limited Nature of this Privacy Policy

Nothing contained in this Privacy Policy is intended to create a contract or agreement between Peloton and you and you may not rely on it as such.

Contacting or Communicating With Us

If you:

- have any questions with respect to our privacy policies or practises;
- have any questions with respect to our handling of your personal information;
- if you wish to request access to or correction of your personal information under our care or control; or
- if you are dissatisfied with our handling of your personal information,

please contact our Privacy Officer at:

Attention: Privacy Officer	
Contact:	Peloton Computer Enterprises Ltd. Facsimile: (403) 263-2916
email:	privacy.officer@peloton.com