

TRANSERA GROUP LTD. · ENGAGEMENT POLICY

Privacy Policy

How Transera Group Ltd. collects, uses, discloses, and safeguards personal information.

Document	Privacy Policy
Compliance	PIPEDA (federal) + CASL + applicable provincial privacy law
Effective date	29 April 2026
Privacy Officer	Kapil Shah, Founder & CEO · ceo@transeragroup.com
Governing law	Province of Ontario, Canada

1. Overview

Transera Group Ltd. (“Transera”, “we”, “our”, “us”) is committed to protecting the privacy of personal information in our care. This Privacy Policy describes how we collect, use, disclose, and safeguard personal information in connection with our website (www.transeragroup.com), engagement services, and related communications.

This policy is designed to comply with the **Personal Information Protection and Electronic Documents Act (PIPEDA)** — the federal Canadian privacy law that applies to private-sector organizations — and Canada’s Anti-Spam Legislation (**CASL**). Where applicable provincial privacy law imposes additional obligations, we comply with those as well.

2. Personal Information We Collect

We collect personal information you provide directly to us, and limited technical information collected automatically when you visit our website.

2.1 Information you provide directly

- **Contact information:** name, email address, phone number, organization, role/title.
- **Engagement information:** details of your electrification program, business context, and any documents or materials you share with us in connection with an engagement.
- **Booking information:** scheduling preferences, time zone, and meeting attendees.
- **Payment information:** for paid engagements, payment is processed by our payment processor (Stripe). Transera does not store full credit card numbers; we receive only a transaction reference and the last four digits of the card used.
- **Communications:** emails, voicemails, and other messages you send to us.

2.2 Information collected automatically

- **Server logs:** IP address, browser type, operating system, referring URL, and pages visited (standard web server logs retained for security and analytics purposes).
- **Cookies:** see Section 8 below.

3. How We Use Personal Information

We use personal information for the following purposes:

- Delivering services you have requested or contracted with us to provide.
- Responding to inquiries and providing customer service.
- Scheduling and confirming meetings and engagements.
- Processing payments and issuing receipts (via Stripe).
- Sending engagement-related communications (e.g., booking confirmations, prep checklists, follow-ups).
- Maintaining the security and integrity of our website and systems.
- Complying with legal, regulatory, and tax obligations.
- With your express consent, sending marketing or commercial electronic messages (subject to CASL).

4. Consent

PIPEDA requires that personal information be collected, used, and disclosed with the knowledge and consent of the individual, subject to limited exceptions. We obtain consent in one of the following ways:

- **Express consent:** when you fill in a form, sign an engagement letter, or click an opt-in checkbox.
- **Implied consent:** when the purpose for collection is obvious and you voluntarily provide the information (e.g., responding to an email inquiry).
- **Withdrawal of consent:** you may withdraw consent at any time by contacting our Privacy Officer. Withdrawal may limit our ability to provide certain services.

5. Disclosure to Third Parties

Transera does not sell, rent, or trade personal information. We disclose personal information only in the following circumstances:

- **Service providers:** payment processing (Stripe), scheduling (Microsoft Bookings), email and calendar (Microsoft 365), website hosting, and similar operational vendors. These vendors are contractually obligated to protect personal information and use it only for the purposes we specify.
- **Professional partners:** where an engagement requires coordination with licensed professionals (e.g., P.Eng partners, electrical contracting partners), we share only the information necessary to deliver the engagement, and only with your knowledge.
- **Legal compliance:** where required by law, court order, or regulatory authority.
- **Business transactions:** in the event of a merger, acquisition, or sale of assets, personal information may be transferred as part of the transaction, subject to confidentiality protections.

6. Cross-Border Data Transfers

Some of our service providers (including Stripe and Microsoft) process data on servers located outside of Canada, including in the United States and the European Union. When personal information is transferred to a foreign jurisdiction, it is subject to the laws of that jurisdiction and may be accessed by foreign courts, law enforcement, or national security authorities. Our service providers are bound by contract to protect personal information to standards comparable to those required in Canada.

7. Retention and Security

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by law. Engagement records are retained for a minimum of seven (7) years to comply with Canadian tax and professional record-keeping requirements.

We protect personal information through reasonable physical, organizational, and technological safeguards appropriate to the sensitivity of the information — including encrypted communication channels, access controls, and vendor due diligence on third-party processors.

8. Cookies and Website Analytics

Our website uses essential cookies required for basic functionality. We do not use third-party advertising cookies or cross-site tracking. Server logs may include anonymized analytics on aggregate page views, browser type, and referrer information for the purpose of maintaining and improving the site.

You can control cookies through your browser settings. Disabling essential cookies may affect site functionality (such as form submissions or scheduling).

9. Commercial Electronic Messages (CASL)

Canada's Anti-Spam Legislation (CASL) regulates the sending of commercial electronic messages. Transera complies with CASL through the following practices:

- **Express or implied consent:** we send commercial electronic messages only where we have express consent (e.g., you opted in) or implied consent under CASL (e.g., an existing business relationship).
- **Sender identification:** every commercial message clearly identifies Transera and our contact information.
- **Unsubscribe mechanism:** every commercial message includes a clear, working unsubscribe option that is honored within ten (10) business days.
- **Records of consent:** we maintain records demonstrating consent for each recipient.

10. Your Rights Under PIPEDA

PIPEDA provides you with the following rights regarding your personal information:

- **Access:** you may request access to the personal information we hold about you.
- **Correction:** you may request correction of inaccurate or incomplete personal information.
- **Withdrawal of consent:** you may withdraw consent for collection, use, or disclosure (subject to legal or contractual restrictions and reasonable notice).
- **Complaint:** you may file a complaint with our Privacy Officer or with the Office of the Privacy Commissioner of Canada.

11. Contact Us

To exercise any of the rights described above, ask a question about this policy, or file a privacy-related complaint, please contact our Privacy Officer:

Privacy Officer

Kapil Shah, Founder & CEO

Email	ceo@transeragroup.com
Phone	+1 (365) 777-1235
Mail	Transera Group Ltd., Guelph, Ontario, Canada

You may also escalate to the **Office of the Privacy Commissioner of Canada** at www.priv.gc.ca or 1-800-282-1376.

12. Changes to This Policy

We may update this policy periodically to reflect changes in our practices, technology, or legal requirements. Material changes will be communicated through our website. The current version is always available at www.transeragroup.com/privacy.html. Effective date: 29 April 2026.