

1. OVERVIEW

At CALSTON GROUP LTD. (the “Company”, “we” or “us”), we use our website and other internet-based tools for the following purpose:

We are a technical services company that offers valve training, technical consulting services, venture support consulting services, resale of specialty products and field services/applications.

We are required to collect and retain information about the people and companies that access and use the website (“Users” or “you”). This Policy applies to our privacy practices on all communications between the Company and Users, including but not limited to communication via:



The Company website (including the website hosted at www.calstongroup.com and any other web domain used by the Company to communicate with users now or in the future);



Any mobile, computer, or tablet-based application currently offered by Company or developed in the future by the Company; and



All other services provided by the Company, as described on the Website (items 1 to 3 are collectively referred to as the “Website”).

This Privacy Policy (“Policy”) sets out how we use, protect, collect and preserve information submitted by Users, including User information gathered by our technology. This Policy should be read in conjunction with any Terms of Use or policies available on the Website.

By accessing or submitting any information through the Website, you are agreeing to the terms of this Policy. You are prohibited from accessing or using the Website unless you fully understand and agree to this Policy and all Terms of Use available for review on the Website.

If you have any questions about this Policy, please contact us by sending an email with your questions to info@calstongroup.com before accessing or entering any information on the Website.

2. INFORMATION ABOUT USERS WE COLLECT AND STORE

When you access and use the Website, we will collect and retain all personal identifying information submitted to us.

We will take steps to protect the information submitted to us by Users and we will not disclose any personal identifying information without the consent of Users, unless otherwise set out in this Policy. Personal identifying information may include but is not necessarily limited to:

Full name, email, phone number, address, company and job title

We will not use personal identifying information to contact you for any reason unrelated to your use of the Website or for commercial reasons unrelated to the business of the Company. Except with your consent or where required by law, we will not provide personal identifying information to any third party.

3. ADDITIONAL DATA COLLECTED

To learn about your experience as a User and to make periodic improvements to the Website and our business, we may collect and retain certain information. We will automatically record information about your activity on the Website. This may include your Internet Protocol (IP) address, operating system, geolocation information, locale preferences, identification numbers associated with your computers and mobile devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata, and other electronic interactions with the Company and the Website.

4. PERMITTED USES OF DATA

We use data collected from the Website for various purposes, including to: provide the Website to you and accompanying customer support; notify you about updates and changes to the Website; prevent and address technical issues with the Website; monitor usage of the Website.

Without restriction, we may use any information you submit through the Website for any purpose we deem appropriate so long as it is anonymous and stripped of any and all personal identifying information.

We may use the data collected from the Website, devices, browsers, and any other sources, for its own purposes, both related to and unrelated to improving the Website.

5. LEGAL BASIS FOR PROCESSING PERSONAL IDENTIFYING INFORMATION

We may process your personal identifying information for a number of reasons, including:

- A. performing a contract with you relating to the Website
- B. you have provided us consent to do so
- C. fulfilling a legal obligation
- D. fulfilling our legitimate interests, which are not overridden by your rights
- E. for payment processing purposes

6. ACCESSING, CORRECTING & DELETING YOUR PERSONAL INFORMATION

If you wish to access or amend your personal information or to request that we permanently delete your personal information from our servers, please send an email to info@calstongroup.com. We will ensure your personal information is accessible, amended and/or deleted in a reasonable time after receiving that request. Deleting such information may require us to terminate any account you may have created in its entirety and prevent you from using the Website.

So long as your account remains active, we will preserve your personal information in accordance with the Policy.

You may decline to share certain personal information with us, in which case you may not be able to use the Website, either in its entirety or certain features.

When deleting your information, whether by request or due to inactivity, we will use standard electronic means to remove your personal information from our files.

We will also retain any and all information that we are required to retain under any applicable laws for the full duration of time required under those laws.

7. KEEPING YOUR DATA SECURE

We will store your information in electronic format on industry-standard servers that we have selected. Except where required to do so by law, we will not store your personal information in any physical or paper-based format.

The servers we select to store information engage security software and generally accepted standards to protect personal information. The software used by these servers is intended to prevent unauthorized access or improper use.

However, no security system is perfect and there is always a risk of unauthorized parties accessing your personal information. Therefore, we make no guarantees or representations as to the technical or legal compliance of the servers we use. We cannot guarantee the complete protection and security of your personal information.

Our servers are located exclusively in Canada.

8. SECURITY BREACHES

In the event the personal information of a User is disclosed as the result of any breach of security of the Website or its servers, regardless of who is at fault, we will take steps to advise all known affected Users within a reasonable timeframe of learning of the breach.

9. USE OF WEBSITE BY MINORS

With the following restrictions, the Website may be accessed in certain circumstances by persons under the age of 18.

We take the following precautions to protect the safety and information of persons under the age of 18:

Persons under the age of 13 are prohibited from using the Website without the express permission and direct supervision of a parent or guardian. Persons under the age of 13 are prohibited from submitting any personal identifying information through the Website. The Company will immediately delete any personal identifying information submitted in violation of this Policy.

10. DISCLOSURE OF PERSONAL INFORMATION

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We may disclose your personal information to third parties:

- A. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- B. If the Company or its assets are acquired by a third party, in which case personal data about Users may be one of the transferred assets.
- C. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use; or to protect the rights, property, or safety of the Company, our Users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

11. DATA SHARING

- A. Customer data is not shared with third parties for promotional or marketing purposes.
- B. Mobile opt-in and consent are never shared with anyone for any purpose. Any information sharing that may be mentioned elsewhere in this Policy excludes mobile opt-in data.

12. MESSAGING TERMS AND CONDITIONS

- A. The messaging program provides SMS messages from **Calston Group Ltd.** for direct communication with customers, including customer service and account-related messages, technical support, service updates, and occasional marketing/promotional messages (where permitted by law). Message frequency will vary based on communication needs.

Opt-in/consent: You opt in by providing your mobile number and affirmatively consenting to receive SMS messages from us (for example, by completing a paper/manual form, submitting an online form, checking a consent box, or using another opt-in method we make available). By opting in, you authorize us to send recurring text messages to the mobile number you provided. Consent to receive SMS messages is not a condition of purchase.

- B. **Opt-out:** You can cancel the SMS service at any time by texting STOP to the phone number from which you received messages. After you send STOP to us, we will send you an SMS message confirming that you have been unsubscribed. After this, you will no longer receive SMS messages from us, unless you opt in again. If you need assistance at any time, contact us at info@calstongroup.com or 1-833-225-7866.

Re-enrollment: If you want to join again, sign up as you did the first time and we will start sending SMS messages to you again.

- C. If you are experiencing issues with the messaging program you can get help directly at info@calstongroup.com or 1-833-225-7866.
- D. Carriers are not liable for delayed or undelivered messages.
- E. As always, message and data rates may apply for any messages sent to you from us and to us from you. If you have any questions about your text plan or data plan, it is best to contact your wireless provider.
- F. If you have any questions regarding privacy, please read this Privacy Policy.

13. AMENDING THIS POLICY

This Policy may be updated and amended from time to time. We reserve the right to change this Policy at any time, and any amended Policy is effective upon posting to the Website. We will make efforts to communicate any changes to this Policy we deem material, in our sole discretion, via email or notifications on the Website. Your continued use of the Website will be deemed acceptance of any amended Policy.

14. CONTACT US

We encourage you to send us questions and inquiries on this Policy and the steps we take to keep your personal information secure. Please send us an email: info@calstongroup.com
We will respond to all inquiries on the Policy within 10 days.

LAST REVISION DATE: APRIL 19, 2026