

Privacy Policy

Boldstok Ltd.

Last updated: April 27, 2019

At Boldstok Ltd. (the "**Company**", "**us**", "**we**", "**our**"), we are committed to protecting your personal information. This privacy policy (this "**Policy**") outlines the principles and practices we follow with respect to the collection, use, disclosure and storage of the personal information provided to us by users of our website at BoldStok.com (the "**Website**") and the contests and other services we offer (together with the Website, the "**Service**"). This Policy was developed in compliance with applicable laws in Canada ("**Applicable Privacy Laws**").

1. Terms

This Policy forms an important part of, and is incorporated into, our official contest rules available here: BoldStok.com (the "**Rules**"). Please review those Rules carefully.

2. Updates to this Policy

From time to time, we may make changes to this Policy. We will use reasonable efforts, where appropriate, to notify you at earlier before such changes take effect by:

- contacting you at the email address you have provided (if applicable), and
- displaying a notice on our Website.

Please always review any Policy changes as they may affect the collection, use and disclosure of your personal information. If you continue to use our Service after such changes come into effect, you will be deemed to have accepted the changes. If you do not accept the changes, please stop using our Service before the changes come into effect.

3. Privacy Officer

We have appointed a Privacy Officer who is responsible for our compliance with this Policy. Our Privacy Officer can be contacted at: BoldStokPrivacy@email.com.

4. Personal vs. Non-Personal Information

(a) *Personal Information*

For the purposes of this Policy, "**personal information**" means information about an identifiable individual, for example an individual's name, home address, telephone number, sex, income, and family status. Personal information does not include information that would enable an individual to be contacted at a place of business, for example an employee's name, position or title, business telephone number, or business address. We will only collect, use or disclose personal information in accordance with this Policy and Applicable Privacy Laws.

(b) *Non-Personal Information*

The other type of information we may collect is “**non-personal information**”, which is any type of information other than personal information, such as: (i) business information, or information that enables an individual to be contacted at a place of business, for example an employee’s name, position or title, business telephone number, or business address, (ii) information that is anonymous or not about an identifiable individual, such as web browsing information (like the domain used to access the Website, or the type and version of device, browser or operating system being used to access the Website), and (iii) aggregate information that anonymizes the underlying data (like the number of visitors, what pages users visit and average time spent on the various parts of the Website). We will collect, use or disclose non-personal information in accordance with our ordinary business practices, but always in accordance with any Applicable Privacy Laws. Non-personal information is not the subject of this Policy.

5. Privacy of Minors

Our Service is intended solely for users who are not minors, but who have achieved the age of majority in their province of residence. We do not knowingly collect personal information about any person under that age, or from persons from Quebec or outside of Canada. No such person, nor any parent or guardian as it relates to such person, should submit their personal information to us for any reason. Please do not submit personal information about minors to us, whether through the Service or otherwise.

6. Collecting Personal Information

(a) *Personal Information We Collect*

The types of personal information we collect about you will depend on the nature of your interaction with us or the Service. We may collect the following personal information:

- first and last name,
- email address,
- contact information, such as your mailing address, e-mail address, and telephone number,
- payment information, such as your PayPal, interact e-transfer, or other details necessary to receive and make payments to you,
- province of residence,
- information you share in any contest materials, as well as any personal information that you voluntarily enter into any postings, comments or reviews available through our Website.

(b) *Information We Automatically Collect*

We may also automatically gather information about your device such as your IP address, browser type, referring/exit pages, operating system, which pages you view, as well as which aspects of our performance metric indicators available with our technology or our licensees’ products you prefer using. Some of this may be personal information, but in typical cases it is non-personal information.

Specific examples follow:

- **IP, etc.:** When using our Website, we may collect the Internet Protocol (IP) address of your device, the IP address of your Internet Service Provider, the date and time you access our Website, the Internet address of the website from which you linked directly to our Website, the operating system you are using, the parts of our Website that you visit, the specific website pages read and images viewed, and the content you download from our Website. This information is used for Website and system administration purposes, and to improve the Website.

- **Cookies:** We may use “cookies”, a technology that installs a small amount of information on a user’s device to permit the Website to recognize future visits using that device. Cookies enhance the convenience and use of the Website. For example, the information provided through cookies is used to recognize you as a previous user of the Website, to offer personalized content and information for your use, to track your activity on the Website, to respond to your needs, and to otherwise facilitate your Website experience. You may choose to decline cookies if your browser permits, but doing so may affect your use of the Website and your ability to access certain features of the Website or engage in transactions through the Website.
- **Tracking Information:** We may use web beacons or single-pixel gif tags to compile tracking information reports regarding Website user demographics, Website traffic patterns, Website purchases and other aggregated Website statistics, and may be used in our emails to determine which emails and links have been used by recipients. We may then provide these reports to advertisers and others. None of the tracking information in these reports can be connected to the identities or other personal information of individual users. For our own research purposes, we may link tracking information with personal information voluntarily provided by Website users. Once such a link is made, all of the linked information is treated as personal information and will be used and disclosed only in accordance with this Policy.
- **Analytics:** We may use third party analytics services, which may record mouse clicks, mouse movements, scrolling activity as well as any text you type in this Website. These services do not collect personally identifiable information that you do not voluntarily enter into the Website.
- **Geo-Location Information**—When you use the Website through a device, we may track or collect your geo-location information on a real time basis only. We may also use this real-time geo-location information to address support, technical, or business issues that may arise in the course of your use of the Website. If you do not consent to the tracking of your geo-location, you may still be able to use some features of the Website, but it is intended to be used with geo-location information.

7. How We Use Personal Information

We may use your personal information, and your non-personal information (where applicable), to:

- identify your preferences,
- display content based upon your interests,
- understand the personal development needs of our users,
- respond to your requests and inquiries,
- deliver requested contest information,
- send you information about us, or about your status in the contest,
- contact you regarding future contests, products and/or services that may be of interest to you,
- improve our Service,
- enforce our Rules and this Policy,
- for distribution to our third party processors for the administration of the contest, if applicable,
- send you marketing communications,
- contact you regarding your participation in our contests,
- contact you regarding changes to our Policy, Rules, or other policies or terms that affect you and the contests or your use of our Service,
- meet regulatory or other legal requirements,
- conduct research and analysis, and
- for other purposes as may be disclosed in this Policy or at the time of collection

We may combine the information we collect with information available from other sources, including information received from promotional partners or other third parties.

Agents and contractors who have access to personally identifiable information are required to protect this information in a manner that is consistent with this Policy by, for example, not using the information for any purpose other than to carry out the services they are performing for us.

8. Your Consent

We will collect, use, or disclose your personal information only with your knowledge and consent, except where required or permitted by Applicable Privacy Laws. When you choose to provide us with your personal information, you consent to the use of your personal information as identified in this Policy and as may be further identified at the time of collection.

(a) Express Consent

Sometimes you will be asked to give your express consent to our collection, use or disclosure of personal information – for example, by being asked to check a box to indicate your consent to receive marketing communications.

(b) Implied Consent

Other times, you may provide your implied consent to our collection, use or disclosure of personal information when we can reasonably conclude that you have given consent by some action you have taken or an action you have decided not to take. Generally, this occurs where the purpose for the use of your personal information would be reasonably apparent to you – for example, when you provide us with your address through a form or email seeking information, you provide us with implied consent to use that address in order to respond to your request.

(c) Withdrawing Your Consent

You may notify us at any time that you wish to withdraw or change your consent to our use and disclosure of your personal information. We will accommodate your request subject to legal and contractual restrictions. The most common way of indicating this withdrawal of consent is (i) by changing your privacy preferences to the extent such functionality is made available through the Website, or (ii) deleting your account with the Website and stopping use of the Service. In other situations, you may be able to opt out of the use of your personal information. For example, if you have 'opted in' or subscribed to one of our mailing lists, we will always provide you the opportunity to 'opt out' or unsubscribe (whether through an unsubscribe link in the email itself, or by contacting our Privacy Officer).

You may also choose not to provide us with your personal information. However, if you make this choice we may not be able to provide you with the Service, or information that you have requested.

In certain limited circumstances we may collect, use or disclose personal information without your consent, including:

- when the collection, use or disclosure of personal information is permitted or required by Applicable Privacy Laws,
- to protect ourselves from fraud or suspected fraud, and
- to investigate a contravention of law.

9. Disclosure of Personal Information

We may share personal information with our third-party service suppliers, including those who work on behalf of the Company, to deliver the information, products and/or services the Customer has requested from the Company.

We may also share personal information when required by Applicable Privacy Laws or other applicable laws. Some of these activities, including those listed below, may result in personal information collected by us being stored or processed in the United States or elsewhere outside of Canada and, as a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with the USA PATRIOT Act, the USA FREEDOM Act and other applicable laws of the United States or elsewhere.

(a) *Third Party Processors*

We may provide your personal information to companies that provide services to help us with the Service such as web hosting providers, payment processors, or customer service agencies ("**Third Party Processors**"). These Third Party Processors are authorized to use your personal information only as necessary to provide these services to us, and in a manner consistent with this Policy. We have selected Third Party Processors who will only use your information in compliance with this Policy, but they may have their own specific policies regarding the collection, use and disclosure of personal information. We will use commercially reasonable efforts to identify such Third Party Processors when we are collecting your personal information, as well as providing links to the relevant privacy policies that may apply. A list of Third Party Processors, their privacy policies, and, if outside of Alberta, their jurisdictions where they may follow:

- Wishpond Technologies Ltd. for online administration of contest, <https://www.wishpond.com/privacy-policy/> (British Columbia, United States)
- Squareup, Inc. for credit card processing, <https://squareup.com/ca/en/legal/general/privacy> (Japan, United States, and other countries, per Squareup, Inc.'s privacy policy)

(b) *Further Disclosures*

We may also disclose your personal information:

- as required by law such as to comply with a subpoena, or similar legal process,
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request, or
- to any other third party with your prior consent to do so.

(c) *Third Party Links*

Our Website may contain links to other websites or Internet resources which are provided solely for your convenience and information. When you click on one of those links you are contacting another website or Internet resource. We have no responsibility or liability for, or control over, those other websites or Internet resources or their collection, use and disclosure of your personal information. We encourage you to read the privacy policies of those other websites to learn how they collect and use your personal information.

10. Access to and Accuracy of Personal Information

Applicable Privacy Laws provide you with, to varying degrees, the right to (a) request the correction of errors or omissions in your personal information that is in our custody or under our control, and (b) right to access, your personal information that is in our custody or under our control, including:

- identification of personal information under our custody or control,
- information about how personal information under our control may be or has been used by us, and
- the names of any individuals and organizations to which the individual's personal information has been disclosed.

Our Privacy Officer will assist you with such requests. We will respond to requests within the time allowed by Applicable Privacy Laws and will make every effort to respond as accurately and completely as possible. Any corrections made to personal information will promptly be sent to any organization it was disclosed to. We may charge a minimal fee for providing access to personal information. Where a fee may apply, we will inform you of the cost and request further direction from you on whether or not we should proceed with the request.

In certain exceptional circumstances, we may not be able to provide access to certain personal information we hold about an individual. If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

11. Retention and Removal of Personal Information

We will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose. If we use your personal information to make a decision that directly affects you, we will retain that personal information for at least one year so that you have a reasonable opportunity to request access to it.

We have retention standards that meet these parameters. We destroy your information when it is no longer needed or required to be kept, or we remove your personally identifiable information to render it anonymous.

12. Our Policy on Commercial Electronic Messages

We are committed to compliance with the law known as Canada's Anti-Spam Legislation ("**CASL**"). CASL regulates, and our policies generally apply to, each commercial electronic message we send (a "**CEM**"), which is an electronic message sent to an electronic address that, among its purposes, encourages participation in a commercial activity. In addition to adopting this Policy, and to provide transparency about our compliance, we have undertaken various initiatives in order to ensure we are compliant with CASL in various respects:

- (a) *Consent:* We do not send CEMs without your consent. This consent typically must be 'express' (or expressly acknowledged by you), but in certain circumstances consent can be 'implied' and in others, messages are specifically exempt from consent requirements. We have modified or adopted our sign-up, registration and consent forms in order to ensure that the express consent obtained from you is in compliance with CASL. When we are collecting your electronic contact information, you will know what purposes we want to use it for.
- (b) *Content:* We have adopted processes to ensure that our CEMs contain the prescribed content of CASL. On any CEM from us (usually in the footer), we will clearly:
 - Identify ourselves as the party sending the CEM, and whether we are sending the message on our own behalf or on behalf of someone else,
 - Provide you contact information where you can readily contact us, and
 - Set out a clear, working unsubscribe mechanism (or preference centre) that is easy to use, automatic, and at no cost to you (other than your own cost of connecting to the Internet).

- (c) *Clarity.* We have ensured that each constituent element of a CEM (including its header, its content, or any links or URLs in the CEM) conveys the appropriate information, whether viewed individually or taken as a whole, so that you always know what you are clicking on.

If you have received a CEM from us, and you believe that you should not have or you do not wish to receive them (even if we are allowed to send them), we will endeavour to respect your inbox preferences. Without limiting our legal rights or obligations, we try to ensure that our messages all contain useful identity information and unsubscribe or preferences link in our messages—if you check the CEM itself, you will find clear instructions on how to stop receiving CEMs from us or manage your mail preferences. When you unsubscribe, it should happen very quickly – but as required by CASL we will make sure it occurs within 10 business days. If you have any questions or concerns about our unsubscribe methods, you may contact us at the address indicated below.

13. Our Security Practices

- (a) *General Security Practices*

We are committed to ensuring the security of personal information, and we follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. We employ physical, administrative, contractual and technological safeguards to protect personal information, and insist that our service providers do the same. We insist that our personnel, and those of our providers, only access and use personal information in order to properly perform those duties, and even then only to the strict extent necessary to perform them.

As indicated above, we may use a third-party service providers (for example, web hosting providers and/or a data management providers) to store personal information. If we use third-party service providers, we will ensure they have adequate security measures in place to safeguard personal information.

We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

- (b) *Security Breaches*

Additionally, in the event of a security breach involving personal information that poses a real risk of significant harm to individuals, we are obligated to: (i) report to the Privacy Commissioner, (ii) notify affected individuals of the breach, and (iii) keep records of such breach. Whether a breach constitutes a 'real risk of significant harm to individuals' is determined by the sensitivity of the personal information involved in the breach and the probability that the personal information will be misused. Significant harm can include: bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.

14. Risks of Harm

We follow generally accepted industry standards to protect personal information submitted to us, however, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and so you should always exercise caution when disclosing sensitive information over the Internet. Risks of harm arising from your disclosure of personal information to us, include:

- inadvertent disclosure of your personal information,
- fraud or identity theft, and

- data processed, transmitted, or stored outside of Canada may be subject to privacy laws that are less protective of your personal information than Canadian privacy laws.

15. Contact Us

The Privacy Officer is responsible for ensuring the Company's compliance with this Policy and Applicable Privacy Laws. Please direct any complaints, concerns or questions regarding our compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, you may also write to the Office of the Privacy Commissioner of Alberta or Canada, as the case may be.

Contact information for the Privacy Officer: BoldStokPrivacy@email.com.