

Town of Collingwood

Privacy policy

January 11, 2021

Town of Collingwood develops a mobile application which enable arts, culture and heritage organizations to share immersive audio experiences, audio tours, events, and depictions of places of interest. The user is presented with content that they have chosen based on their interests and that is related to their immediate location or to a location they plan to visit. The Discover Collingwood App is designed to encourage users to explore their surroundings, experiencing stories from myriad perspectives as they move through space.

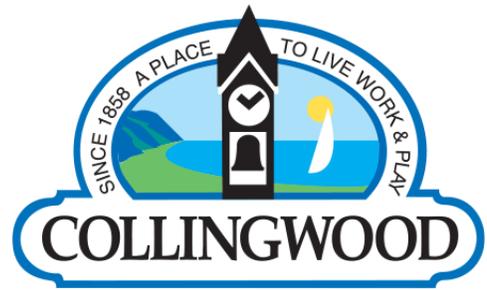
Town of Collingwood is a company with limited liability established and existing under the laws of the Canada, having its registered office at 97 Hurontario St., PO Box 157 Collingwood, ON L9Y 3Z5.

This Privacy Policy explains how Town of Collingwood ("**we**", "**us**", "**our**" or "**Discover Collingwood App**") collects, uses and shares your "**Personal Information**" — information that identifies, relates to, describes or is capable of being associated with you as a particular individual, such as your name, address, email address or telephone number—and other data through your use of any of our application, web sites, services, code and/or software (collectively, the "**Services**").

By accessing the Services, you accept this Privacy Policy, agree to the terms, conditions and notices contained or referenced herein as well as in Town of Collingwood's End-User License Agreement (EULA) terms of service, and you consent to collection, use and disclosure of your Personal Information as described herein.

What Information We Collect

We may collect two types of Personal Information: (i) personally identifiable information ("**PII**"), which constitutes any information that can identify an individual directly or through



other reasonably available means and is otherwise referred to herein as "**Personal Information**", but does not include information deemed not to be Personal Information in accordance with applicable law; and (ii) non-personally identifiable information ("**Non-PII**"), which is also referred to as aggregate and anonymous data, or is information that would not, in and of itself, identify you. Please note that what one may initially consider to be Non-PII may, in some contexts, such as in respect of small geographic locations or communities, result in such information being attributable to you or allowing you to be identified because of the context. Please consider this when providing information.

What Information We Ask You For

The app may offer the option to create a user account. If so, you will be asked to provide us with certain PII about yourself such as your name, email address, account name, password, phone number and preferred language.

If you use the planned in-app payment system to purchase content, the applicable platform provider (Google or Apple) will collect data on the payment in accordance with its privacy policy. We will obtain from Google or Apple information about the content that you purchased, and use this information to handle its payments to content providers.

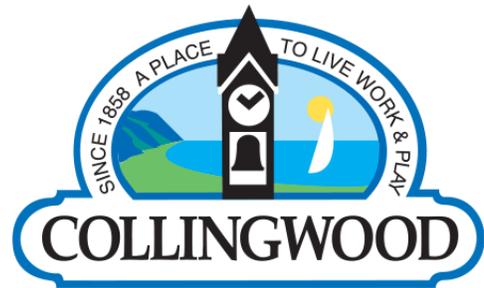
Location Information

When you first launch the App, you will be asked to consent to Town of Collingwood's collection of location information. We require this location information in order for the Discover Collingwood App to function as designed. If you consent to our collection of location information, such information represents PII data that we will collect and use.

You may also stop our collection of location information by following the standard uninstall process to remove the App from your device.

What Information We Automatically Gather

Some Non-PII may automatically be collected when you use or visit the Services. We collect and store information related to your use of the Services, such as the content you view, and information pertaining to your computer or mobile device, your location, network, IP-address,



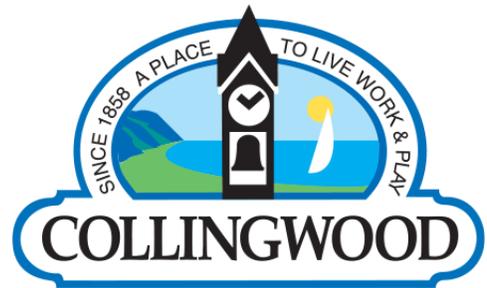
protocols and software and the date and time of your visit. Some of this information is collected through Google Analytics. If you use our web sites, your browsing history (i.e. which pages you view on the website), IP-address and information on your browser and your operating system is collected through Google Analytics.

How We Use Your Information

The Non-PII we automatically collect is used to help us provide a more relevant and useful site experience to you. This information is also used in the aggregate to perform statistical analyses of user behaviour and characteristics in order to measure interest in and use of the various areas of the Services. Our primary objective in collecting your information is to provide services that are of the greatest interest and use to you. In addition to those uses mentioned above, we may use the PII collected for the following purposes: (i) for registration and access to your account; (ii) to manage your account; (iii) to communicate with you; (iv) to measure interest in and improve our Services; (v) to provide you with information and offers from us or third parties that we believe you may find useful or interesting, including marketing or promotional materials, advertisements, coupons and other information on services and products offered by us or third parties; (vi) to resolve disputes, troubleshoot problems; and (vii) to monitor the Services and to enforce the EULA terms of service. In addition, the Personal Information allows us to develop and customize the Services and to better understand what products and services you would like. The Personal Information may also be used to send you e-mails that we believe may be of interest to you, such as our newsletters. You may opt out of receiving any such e-mails by following the unsubscribe instructions in the email.

In addition to the uses mentioned above, we use the Non-PII collection for the following purposes: (i) to monitor and analyze use of the Services and for the technical administration of the Services; (ii) to increase functionality and user-friendliness of the Services; (iii) to better tailor the Services to your needs; (iv) to generate and derive useful data and information concerning the interests, characteristics and use behaviour of users, and to verify that users of the Services meet the criteria required to process their requests, (v) to share this data to third parties.

Transfer to third parties



We may share non-PII in the aggregate to third parties relating to user behaviour in connection with actual or prospective business relationship with those third parties, such as advertisers and content distributors. For example, we may disclose the number of users that have been exposed to, or clicked on, links.

We reserve the right to disclose and/or transfer information about you to a third party in the event of an actual or proposed sale, purchase, lease, amalgamation, merger, joint venture or other type of disposition or financing of any or all of the Town of Collingwood or any of its assets or shares. If another company acquires our company or all or substantially all of our assets, that company will assume the rights and obligations with respect to that information as described in this Privacy Policy.

We reserve the right to investigate suspected abuse of the Services, and enforce and apply our EULA terms of service and this Privacy Policy. We may disclose Personal Information about you to third parties if we have a good faith belief that such disclosure is reasonably necessary to: (i) take action regarding suspected illegal activities; (ii) enforce or apply our EULA terms of service and this Privacy Policy; (iii) comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us; or (iv) protect our rights, reputation, and property, or that of our users, affiliates, or the public.

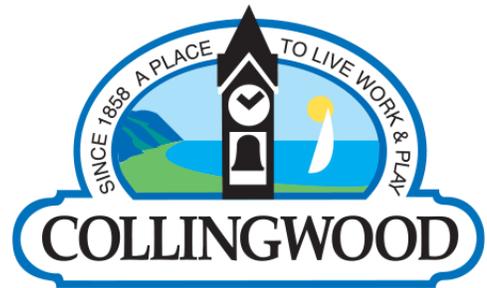
How We Protect Your Personal Information

We understand how important protecting your privacy is, and we are committed to safeguarding the information you provide to us. And while we cannot guarantee absolute security, we have implemented specific security procedures to protect the storage and disclosure of your information. Access to your information is restricted to select employees or representatives.

How You Can Correct Your Information

To update your Personal Information, or please login to our website or the apps available through the Apple App Store or Google Play, or contact us marketing@discovercollingwood.ca and notify us of what information is to be updated.

How Long We Keep Information



We keep the Personal Information you have given us for at least as long as you maintain your account with the Services. Keep in mind, however, that even if you delete your account, we may retain your Personal Information in conformance with our data retention policy, under which we may reasonably retain such information to comply with laws, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our EULA terms of service, and take other actions otherwise permitted by law.

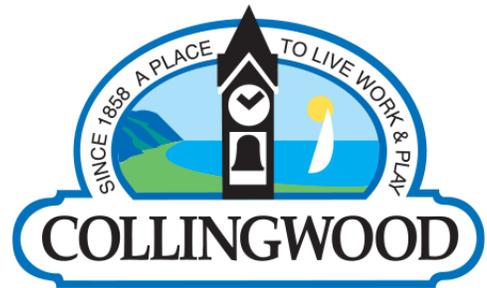
External Links and Parties

If any part of the Services links you to other websites, those external websites do not operate under this Privacy Policy. We recommend that you examine the privacy policies posted on those other websites to understand their procedures for collecting, using, and disclosing personal information. Once you leave our website, our Privacy Policy will no longer apply. Also, we cannot guarantee the privacy of third parties whose information our users have provided to other members on the website.

Canada's Personal Information Protection and Electronic Documents Act

The Canadian government has enacted the Personal Information Protection and Electronic Documents Act ("**PIPEDA**"). PIPEDA outlines the way personal information may be used in Canada, and we fully adhere to it. You may at any time contact us regarding our use of your Personal Information by using the contact information referred to below or at the mailing address referred to below. You may contact us to provide you with more information in respect of our Privacy Policy and privacy practices, or to provide you with an opportunity to review your PII currently held by us and to request an amendment to the PII to correct any inaccuracies you determine are contained in such PII holdings. Where you demonstrate the inaccuracy or incompleteness of your PII held by us, we will correct or update the information as required. Please note that before we are able to provide you with any information or correct any inaccuracies we may ask you to verify your identity and to provide other details to help us to respond to your request. You are also entitled to request information as to the type of PII we have collected from you, how we have used your PII in the past and how we may use it in the future.

There may be circumstances where we are unable to provide access to your PII. We may deny access for legally permissible reasons, such as situations where the information contains



references to other individuals and is not reasonably severable, or where it cannot be disclosed for legal, security or other commercial proprietary reasons.

Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy from time to time. We will notify our members of relevant changes by posting a notice on our website. The most current version of this Privacy Policy will govern our use of your information, and will always be located at <http://collingwood.ca/discover-collingwood-app-privacy-policy>. By continuing to use our Services, you agree to be bound by the revised statement.

Governing Law and Dispute Resolution

This Policy is governed by the laws of Canada and applicable laws of Ontario.

To the extent legally permitted, any claim or cause of action you may have arising from, connected with, or relating to this Privacy Policy or our handling of your Personal Information, or any related matters must be commenced within six (6) months, after the claim or cause of action arises, after which time the claim or cause of action is forever barred, regardless of any statute or law to the contrary.

How to Contact Us

If you have any questions or concerns about our privacy policy, please feel free to contact us at: marketing@discovercollingwood.ca.