

PRIVACY STATEMENT

The purpose of this Privacy Statement is to inform you about the types of personal information Algoma Family Services (as follows, “Algoma Family Services”, “we” or “us”) collects, uses and discloses. It explains how we use and disclose that information, the choices you have regarding such use and disclosure and how you may correct that information.

We are proud to demonstrate our commitment to your privacy by complying with the laws and regulations under applicable privacy laws in Canada, including the Personal Information Protection and Electronic Documents Act.

We will treat personal information in a manner consistent with the version of the Privacy Statement under which it was collected and our Privacy Policy, unless we have your consent to treat it differently.

This Privacy Statement applies to any personal information we collect or receive about you, from any source, including through our websites and other online platforms (the “Sites”). We encourage you to read this Privacy Statement before providing us with any personal information and before using any of the Sites. By providing us with any personal information or using any of the Sites, you are signifying that you agree with all of the terms of this Privacy Statement, so please do not do so if you disagree with any part of this Privacy Statement.

COLLECTION OF PERSONAL INFORMATION

TO WHICH COMPANIES DOES THIS PRIVACY STATEMENT APPLY?

This Privacy Statement applies to the collection, use and disclosure of personal information by Algoma Family Services.

WHAT IS PERSONAL INFORMATION?

Personal information is any factual or subjective information about an identifiable individual. Your personal information may include but is not limited to your name, mailing address, phone numbers, gender, email address, identification numbers, etc. Personal Information, however, does not include any information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, or work electronic address.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We will always collect your personal information by fair and lawful means. For example, you may provide your personal information when you complete a contest ballot form, submit a promotional product request form, participate in a promotional offer, including one that requires you to submit a receipt, or contact Consumer Affairs. You may also provide your personal information when you use one of our Sites, including by creating an account, entering a contest, signing up for email communications or participating in a survey. We sometimes collect personal information from you through third party service providers

We may also collect your demographic data, such as your gender and postal code, and information found on a retail receipt such as your basket size/total purchase amount and products purchased, when you provide this information to us. Demographic data may be used to tailor your experience on the Sites and the communications you receive from us, to determine aggregate consumer preferences and purchasing patterns, and promotion evaluation, development and implementation. On occasion, aggregate information that does not identify any particular user may be compiled and shared with our affiliates and other third parties as described in Section III below.

What about children? We generally do not collect information that is identifiable to children. When we do, it is on a limited basis and with the expectation of adult supervision or permission. For example, we may receive children's names, and associated adult contact information, as part of a contest so that we can notify contest winners. In such cases, we strictly limit the use of that personal information to the purposes for which it was collected. We recommend that parents and guardians take steps to limit and monitor their children's Internet activities directly, or through software and other tools.

HOW DO WE USE TECHNOLOGY TO COLLECT INFORMATION THROUGH THE SITES?

We collect anonymous information about any user of the Sites. This anonymous information may include a user's browser type, type of computer operating system, and the domain name of the website from which the user linked to the Sites. This information is collected for Algoma Family Services' internal use, such as to enhance website security, to detect broad demographic trends, to assist Algoma Family Services in providing content tailored to a user's interests and to otherwise enhance the user experience on the Sites.

We may use a "cookie" or similar technology to assist us to customize the Sites. A "cookie" is a data file that a website sends to a user's computer while that user is viewing the site. These data files include information that allows a website to remember information that will make that user's use of the website more efficient and helpful to him or her. Cookies do not damage computer systems or files, and only the website that transferred a particular cookie to you can read, modify or delete such cookie.

What if I don't want cookies? If you don't want to use cookies with our Sites, there are simple procedures in most browsers that allow you to delete existing cookies, to automatically decline cookies or to be given the choice of declining or accepting the transfer of particular cookies to your computer. Please refer to your browser instructions or help screen to learn more about these functions. You should note that declining cookies may significantly impair your use of our Sites.

USE OF PERSONAL INFORMATION

HOW DO WE USE YOUR PERSONAL INFORMATION?

Whenever we collect your personal information, we will identify the purposes for which we will use that information and we will obtain your consent to such use. We may collect your personal information for a variety of reasons, including: sending you information and communications; responding to product inquiries and other requests; conducting contests and promotions (including sending prizes to winners directly or through third parties acting on our behalf); processing

transactions; optimizing your experience on our Sites; addressing product injury claims; and for internal purposes such as analyzing and managing our business and improving our products, services, and promotion efforts. We may also use, or disclose your personal information, if we have reason to believe that using or disclosing such information is necessary to protect our rights, safety or property, including by detecting and preventing fraud. We may also use your personal information as otherwise permitted by law.

WHEN AND HOW DO WE OBTAIN YOUR CONSENT?

We obtain your consent prior to collecting, using or disclosing your personal information for any purpose. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the personal information and the reasonable expectations you might have in the circumstances. In limited circumstances, we may rely on a third party to obtain your consent to the sharing of your personal information with us.

You may provide your consent to us either orally or in writing. For example, when you submit a contest ballot form to our redemption house, you provide your consent to allow the redemption house to disclose the information in the ballot form to us so that we may identify you as a contest winner. From time to time, we may collect, use or disclose your personal information based on your consent and as permitted by law.

WHERE DO WE STORE YOUR PERSONAL INFORMATION?

We store your personal information in our offices in Canada, as well as our data centres in the United States. While your personal information is in the U.S., it is subject to U.S. laws, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies in the U.S., pursuant to applicable laws.

Our service providers may, from time to time, also hold your personal information in connection with purposes for which you provided your consent. We may keep a record of your personal information, correspondence or comments in a file specific to you.

HOW LONG WILL WE USE, DISCLOSE OR RETAIN YOUR PERSONAL INFORMATION?

We will use, disclose or retain your personal information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. We have established minimum and maximum retention periods and secure procedures for maintaining and destroying your personal information.

WHAT ABOUT USER GENERATED CONTENT?

From time to time, we may receive content from consumers as part of contests, promotions and other functions of our Sites (“User Generated Content” or “UGC”). Any UGC you submit may be publically displayed, including on our Sites, and is subject to any terms and conditions communicated to you as part of the submission process. Please remember that any information you disclose in connection with a UGC submission may become public information and you should exercise caution when deciding to disclose your personal, financial or other information in a submission. Algoma Family Services cannot prevent such information from being used in a manner that may violate this Privacy

Statement, the law or your personal privacy and safety and Algoma Family Services is not responsible for the results of such postings.

ALGOMA FAMILY SERVICES COMMUNICATIONS

Through our Sites and various offline means, you may sign up or opt-in to receive communications from Algoma Family Services. If you do not opt-in, Algoma Family Services will not send you any communications, including promotional offers. Each communication sent to you by Algoma Family Services contains an “unsubscribe” link or other unsubscribe mechanism, allowing you to opt-out at any time. If you opt-in to receive communications from multiple brands within the Algoma Family Services family of companies, and subsequently wish to opt-out, you may need to opt-out individually from each of the brands you elected to receive communications from. See Section IV below for further information on modifying the personal information we have for you, including communication preferences.

DISCLOSURE OF PERSONAL INFORMATION

Generally, we do not disclose your personal information, and where we do, we will identify to whom and for what purposes the disclosure will be made, and will obtain your consent to such disclosure. In any case, we only disclose your personal information as permitted or required by law.

Service Providers and Personal Information. Aside from disclosures, we may use service providers (including our affiliates) to help us operate our business and our Sites and to administer activities on our behalf, such as sending emails, fulfilling orders and conducting contests and promotions. We may share your information with these third parties for those limited purposes. For instance, if you participate in a contest, game or loyalty program resulting in a prize or award, we may share personal information about you with our contest and merchandise fulfillment and management agencies to conduct contests and promotional activities on our behalf. Each of our service providers is required by contract or other binding means to comply with our privacy standards to protect the privacy of your personal information, and to only handle your personal information for Algoma Family Services purposes (and not for its own purposes).

Ad Networks and Anonymous Information. We may have relationships with third party service providers known as Ad Networks to serve ads on our behalf across the Internet. Using cookies and similar technologies (such as “pixel tags”, “web beacons”, “clear GIFs”), Ad Networks collect anonymous information about your visits to our Sites and other websites in order to deliver advertisements that may be of particular interest to you. This process does not involve the collection of any personal information. For example, the Ad Networks do not know your name, phone number, address or email address and we do not share any personal information about you with these Ad Networks.

In connection with these Ad Networks, we adhere to the “Canadian Self-Regulatory Principles for Online Behavioural Advertising”. These Principles were developed by the Digital Advertising Alliance of Canada, a consortium of leading Canadian advertising and marketing associations, with the aim of applying consumer-friendly standards to online behavioural advertising across the World Wide Web.

To opt out of interest-based advertising from third parties collecting data on the Algoma Family Services website, please click [here](#). To find out more about how Ad Networks manage the privacy of information in conjunction with delivering advertisements online, and how to opt-out of information collection by these Ad Networks, you can view websites such as: <http://www.youradchoices.ca> and <http://www.networkadvertising.org>. We do not operate or control these websites, and we are not responsible for the opt-out choices available there.

OPENNESS, ACCESS AND SECURITY

How can you review your personal information that we have collected, used or disclosed?

Algoma Family Services has a variety of convenient methods available that allow you to review, correct, update or otherwise modify information previously collected from you, including communication preferences. You may:

- modify your information on your account profile page on the applicable Site
- use the Contact Us form on the applicable Site
- call 1-705-945-5050 (Monday - Friday, 8:30 am to 4:30 pm EST)
- write us at Algoma Family Services, 205 McNabb Street, Sault Ste. Marie, ON P6B 1Y3

We will make available to you any specific personal information of yours that we have collected, used or disclosed, upon your request, to the extent permitted by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes.

HOW DO YOU KNOW THAT THE PERSONAL INFORMATION WE HAVE FOR YOU IS ACCURATE?

We will ensure that your personal information is kept as accurate, complete and up-to-date as possible. We will not routinely update your personal information, unless such a process is necessary. We expect you, from time to time, to supply us with updates to your personal information, when required.

WHAT IF THE PERSONAL INFORMATION WE HAVE FOR YOU IS INACCURATE?

As described in Section IV(A) above, you can, at any time, contact us to review, correct, update or otherwise modify the personal information we have for you. In each such case, you must clearly indicate the information that you wish to have changed or clearly indicate that you wish to have your personal information removed from our database. If you successfully demonstrate that the personal information we have for you is inaccurate or incomplete, we will amend our records of your personal information as required.

Note that despite any request for a change to or removal of your personal information, we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed or changed.

We may make commercially reasonable efforts to transmit any amended information to third parties having access to your personal information, where necessary in the circumstances.

HOW FAST WILL WE RESPOND TO YOUR REQUESTS?

Please note that requests for changes to your personal information, even those submitted through our Sites, may not be effective immediately. We will attempt to respond to any requests regarding personal information as soon as reasonably possible, and in any event not later than 30 days after receipt of each such request. We will advise you in writing if we cannot respond to any of your requests within this time limit. You have the right to make a complaint to the federal Privacy Commissioner in respect of this time limit.

HOW DO WE KNOW THAT IT IS REALLY YOU REQUESTING YOUR PERSONAL INFORMATION?

We may request that you provide us with sufficient identification before granting you access to information regarding the existence, use or disclosure of your personal information. Any such identification information shall be used only for this purpose.

WHAT SAFEGUARDS HAVE WE IMPLEMENTED TO PROTECT YOUR PERSONAL INFORMATION?

We have implemented physical, organizational, contractual and technological security measures to protect your personal information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only personnel who are granted access to your personal information are those with a business “need-to-know” or whose duties reasonably require access to such information.

WHAT TYPE OF SECURITY DO WE PROVIDE ON OUR SITES?

The security of all personal information collected through our Sites is of utmost importance to us. We have taken reasonable technical, contractual, administrative and physical security steps to protect the personal information collected from you through the Sites, consistent with standard industry practice and the sensitivity of the personal information collected. For example, if and when you provide credit card information, we use secure socket layer (SSL) encryption to protect it. These security measures are periodically reviewed. However, there are some things that users of our Sites can do to help protect the security of their personal information as well. For instance, no user should ever give out their user name and password. Also, every user should sign out of their Internet account and close their browser window each time they finish using the Internet so that other people using the same computer will not have access to their information.

LINKS TO OTHER SITES

Our Sites may contain links to other websites that are not operated by Algoma Family Services. **ALGOMA FAMILY SERVICES IS NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OR THE CONTENT OF SUCH OTHER WEBSITES, INCLUDING WEBSITES OPERATED BY AFFILIATED ENTITIES.** We provide such links only as a convenience and the inclusion of a link on any of our Sites does not imply endorsement of the linked to website by Algoma Family Services. If you provide any personal information through any such third party websites, your transaction will occur on such third party website (and not on our Sites) and the personal information you provide will be collected by and controlled by the privacy policy of that third party. Algoma Family Services recommends that you review the privacy policies of third party websites arrived at from links on our Sites before using those websites.

WHOM DO I CONTACT WITH QUESTIONS OR CONCERNS ABOUT THIS PRIVACY STATEMENT

If you need further assistance, please contact the Algoma Family Services Privacy Officer either by writing to us at Algoma Family Services, 205 McNabb Street, Sault Ste. Marie, ON P6B 1Y3, by telephone at 1-705-945-5050 or by contacting us via the Contact Us page at <https://www.AlgomaFamilyServices.org>

PRIVACY STATEMENT UPDATES

Algoma Family Services reserves the right to make changes in this Privacy Statement. Such changes will take effect immediately upon posting. For your convenience, the last revised date of the current Privacy Statement will be posted at the top of this page. By continuing to interact with us following such changes, including by using our Sites, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Privacy Statement, please do not continue using our Sites.

GOVERNING LAW

This Privacy Statement is governed by, and interpreted and enforced in accordance with, the laws in force in the Province of Ontario and the federal laws of Canada (excluding any conflict of laws, rule or principle which might refer such interpretation to the laws of another jurisdiction).